

Bartman Company Law Firm Complaints Procedure

Article 1 Definitions

The following terms as used in this Firm Complaints Procedure will have the following meanings:

- complaint: any written expression of dissatisfaction by or on behalf of the client vis-à-vis the lawyer or any individuals working under the latter's responsibility, about the formation and performance of a letter of engagement, the quality of service, or the amount of the invoice, not being a complaint within the meaning of paragraph 4 of the Dutch Counsel Act [*Advocatenwet*];
- complainant: the client or their representative who expresses a complaint;
- complaints officer: the lawyer responsible for handling the complaint.

Article 2 Scope

1. This Firm Complaints Procedure will apply to any letter of engagement between the Bartman Company Law and the client.
2. Bartman Company Law will be responsible for the handling of complaints in accordance with the Firm Complaints Procedure.

Article 3 Purpose

The purpose of this Firm Complaints Procedure is:

- a. to record a procedure for the constructive handling of complaints from clients within a reasonable term;
- b. to record a procedure to establish the causes of complaints from clients;
- c. to maintain and improve existing relationships through proper handling of complaints;
- d. to train employees to respond to complaints in a client-oriented fashion;
- e. to improve the quality of service based on complaints handling and complaints analysis.

Article 4 Information upon Commencement of Service

1. This Firm Complaints Procedure has been published on the Bartman Company Law website under the heading "Firm Regulations". In the email containing the letter of engagement the client will be notified that the firm has a Firm Complaints Procedure in place, which will apply to the services.
2. In its general terms and conditions and in the confirmation of engagement, Bartman Company Law has referred to the independent party or agency to which any complaint that has not been resolved after handling may be submitted to obtain a binding decision.
3. Any complaints as referred to in article 1 of this Firm Complaints Procedure which after handling have not been resolved will be submitted to arbitration.

Article 5 Internal Complaints Procedure

1. If a client addresses the firm with a complaint, the complaint will be referred to Mr M. Bruning, cassation lawyer in The Hague, who will act as the firm's complaints officer.
2. The complaints officer will notify the person against whom a complaint has been brought of the relevant complaint, and will give the complainant and the person against whom the complaint has been brought the opportunity to explain the complaint.

3. The person against whom the complaint has been brought will try, in consultation with the client, to find a solution, either independently or through the intermediary of the complaints officer.
4. The complaints officer will handle the complaint within four weeks of receipt or will notify the complainant of any variation from such term, stating reasons, and stating the term within which an opinion on the complaint will be given.
5. The complaints officer will notify the complainant and the person against whom the complaint has been brought in writing of the opinion on the foundation of the complaint, whether or not together with recommendations.
6. If the complaint has been handled satisfactorily, the complainant, the complaints officer, and the person against whom the complaint had been brought will sign the opinion on the foundation of the complaint.

Article 6 Confidentiality and Complaints Handling Free of Charge

1. The complaints officer and the person against whom the complaint has been brought will observe confidentiality in respect of the complaints handling.
2. The complainant will not be required to reimburse any costs of handling of the complaint.

Article 7 Responsibilities

1. The complaints officer will be responsible for punctual handling of the complaint.
2. The person against whom the complaint has been brought will keep the complaints officer informed of any contacts and a possible solution.
3. The complaints officer will keep the complainant informed of the handling of the complaint.
4. The complaints officer will keep the complaint file.

Article 8 Complaints Registration

1. The complaints officer will register the complaint stating the subject of the complaint.
2. A complaint may be categorised according to various subjects.
3. The complaints officer will periodically report on the handling of any complaints and will make recommendations to avoid new complaints, as well as to improve procedures.
4. At least once a year, the reports and recommendations, if any, will be discussed within the firm and submitted for decision-making.