

1) COMPLAINTS HANDLING BY VAN DER STEENHOVEN ADVOCATEN

1.1 INTRODUCTION

One of the priorities of Van der Steenhoven advocaten N.V. is to make sure its clients are satisfied. The firm's employees will do everything they can to provide you with the best possible service. Nevertheless, you may at some point be dissatisfied about a certain aspect of the services we provide. The following is a description of what we can do in those circumstances.

If you are dissatisfied about the quality of services or about the invoice, we kindly request that you first discuss this with the lawyer involved. However, you can also contact the firm's complaints officer. We deal with complaints in accordance with the procedure described in our complaints mechanism, which is clarified in more detail in section 2 below.

We will consult with you to try and find a solution as soon as possible for the problem that has arisen. We will always confirm the solution we find to you in writing. You can expect to receive our written response to your complaint as soon as possible, but by no later than within four weeks.

1.2 DISPUTES COMMITTEE FOR THE LEGAL PROFESSION [*GESCHILLENCOMMISSIE ADVOCATUUR*]

Our firm is affiliated to the Disputes Committee for the Legal Profession [*Geschillencommissie Advocatuur*]. This disputes committee was founded on 1 June 1999 and falls under the responsibility of the Dutch Foundation for Consumer Complaints Boards [*Stichting Geschillencommissies voor consumentenzaken*] (SGC) and the Dutch Foundation for Professional and Commercial Complaints Boards [*Stichting Geschillencommissies voor Beroep en Bedrijf*] (SGB) in The Hague.

You can submit the complaint to the Disputes Committee for the Legal Profession until, at the latest, 12 months after the date of our written response.

If the dispute relates to a commission from a private client, the regulations provide for a binding advice, unless the client decides to submit the matter to the ordinary court within one month after the complaint has been dealt with. In the event of the collection of a claim against a private client, a binding advice will only apply if the client pays the outstanding amount to the Disputes Committee. If the client does not do this, the collection will be subject to arbitration. The Disputes Committee for the Legal Profession is authorised to pass judgement on complaints concerning the quality of the services provided by the lawyer and the amount invoiced. You may also believe that you are entitled to compensation. The Disputes Committee for the Legal Profession is also authorised to pass judgement on compensation claims up to an amount of € 10,000. You can submit claims for higher compensation amounts to the Disputes Committee for the Legal Profession if you explicitly limit the amount

of the claim to a maximum of € 10,000 and relinquish your right to the rest in writing.

Our firm can itself submit unpaid invoices for collection to the Disputes Committee for the Legal Profession.

The Disputes Committee will deal with the case in accordance with the Regulations of the Disputes Committee for the Legal Profession which apply at the moment at which the complaint is submitted to the Disputes Committee. No appeal is possible against Disputes Committee decisions.

In the unfortunate event that you do not believe that the result has been satisfactory, you can submit a complaint to the Disputes Committee for the Legal Profession. This is only possible after you have first submitted your objections to us. This option is also open to you if we have not responded in writing to your complaint within four weeks after your objections have been submitted in writing.

You can contact the Disputes Committee as follows:

Secretary of the Disputes Committee for the Legal Profession
Bordewijklaan 46 (2nd floor)
2591 XR The Hague
Tel.: +31 (0)70 - 310 53 10
Postbus 90600
2509 LP The Hague
www.degeschillencommissie.nl

1.3 Lastly

If you have a complaint we would very much appreciate it if you would let us know. You can rest assured that we will include all legitimate complaints in our internal evaluation and will do our very best to prevent any repeat.

2) COMPLAINTS MECHANISM OF VAN DER STEENHOVEN ADVOCATEN

2.1 DEFINITIONS OF TERMS

Complaint

Any verbal or written expression of dissatisfaction, which can reasonably be designated as such, concerning the services provided by one of the lawyers or employees, as communicated by, or on behalf of, the client.

Complainant

The client or its representative that expresses a complaint.

Complaints procedure

Procedure used by Van der Steenhoven advocaten to deal with complaints.

Complaints mechanism

This written description of the complaints procedure used by Van der Steenhoven advocaten.

Complaints official

The person who is responsible at Van der Steenhoven advocaten for dealing with the complaint: Mr J. van der Steenhoven

Complaints registration form

A form to be used internally to implement the procedure recorded in the complaints mechanism.

Disputes Committee for the Legal Profession

The committee established by the Dutch Foundation for Consumer Complaints Boards [*Stichting Geschillencommissies voor consumentenzaken*] (SGC) and the Dutch Foundation for Professional and Commercial Complaints Boards [*Stichting Geschillencommissies voor Beroep en Bedrijf*] (SGB) to which the firm can submit disputed and unpaid invoices and where price and/or quality disputes and complaints can be brought before a court if the solution provided by the firm is deemed unsatisfactory.

Disputes Regulations for the Legal Profession [*Geschillenregeling Advocatuur*]

The procedure used by the Disputes Committee for the Legal Profession to settle disputes between lawyers and clients.

Regulations of the Disputes Committee for the Legal Profession [*Reglement Geschillencommissie Advocatuur*]

The regulations detailing the method of working of the Disputes Committee for the Legal Profession.

2.2 OBJECTIVES OF THE COMPLAINTS REGULATIONS

- To record a procedure for dealing with client complaints by a reasonable deadline and in a constructive fashion.
- To establish a procedure to determine the causes of client complaints.
- To maintain and improve existing relationships by dealing with complaints properly.
- To train employees in responding to complaints in a client-focused manner.
- To maintain the quality of the services by processing and analysing complaints.

2.3 INFORMING THE CLIENT

The lawyer:

- Informs the client that the office uses complaints regulations.
- Informs the client of the possibility of submitting problems to the Disputes Committee for the Legal Profession.
- Notifies the client that the Regulations of the Disputes Committee for the Legal Profession can be obtained from the committee secretary by writing to the address: Postbus 90600, 2509 LP The Hague, www.degeschillencommissie.nl.

2.4 THE INTERNAL COMPLAINTS PROCEDURE

- If a client contacts the office in any way with a complaint, the lawyer or employee concerned must be informed accordingly.
- The lawyer or employee concerned will try to find a solution together with the client, possibly after consulting the complaints official.
- The lawyer or employee concerned or the complaints official will ensure that the complaint is dealt with properly with due regard for the present complaints regulations.
- Confidentiality must be guaranteed in all circumstances.
- The decision on the complaint will be communicated to the client.
- If the client is not happy with the (proposed) solution, the issue will be submitted to the Disputes Committee for the Legal Profession.

2.5 COMPLAINT REGISTRATION AND CLASSIFICATION

- All complaints are to be registered in accordance with the complaints registration form.
- The complaints official registers and classifies the complaint.
- The complaint is classified

according to method of submission as:

- A. Verbal
- B. Written

according to the nature of the complaint based on the following classes:

- I. Complaints regarding the method of working of/treatment by the lawyer.
- II. Complaints regarding legal/content-related aspects of the services provided.
- III. Complaints regarding financial aspects of the services provided.
- IV. Complaints regarding practices in general.

- A complaint can be allocated to various classes.
- If the complaint has been dealt with satisfactorily, the lawyer concerned or the complaints official will approve the complaints registration form.

2.6 RESPONSIBILITIES

- The lawyer concerned and thereafter the complaints official are responsible for processing and dealing with complaints.
- The complaints official is responsible for ensuring that the complaints registration form is filled in completely.
- The lawyer concerned will update the complaints official on the further processing of the complaint.
- Van der Steenhoven advocaten will process the complaint within four weeks.
- The complaints official will arrange for a response to be sent to the complainant.
- The complaints official will update the complaints dossier.

3) COMPLAINTS REGISTRATION FORM

Date of receipt of complaint	
Name of party that received the complaint	
Client name	
Nationality	
Address	
Email address	
Telephone number	
Mobile telephone number	
Fax number	
Case dossier number	
Lawyer involved	
Description of complaint	
Discussed with lawyer involved on	
Submission of complaint	<input type="checkbox"/> verbal <input type="checkbox"/> written

CLASSIFICATION OF COMPLAINT

<u>Class I: Complaints regarding the method of working of/treatment by the lawyer.</u>	
<input type="checkbox"/>	Incorrect or offensive language
<input type="checkbox"/>	Slowness, laxness, spending insufficient time on, and paying insufficient attention to, the case

<input type="checkbox"/>	Insufficient/incorrect information regarding progress/consequences of the case
<input type="checkbox"/>	Non-submission or late submission of documents, providing incorrect details
<input type="checkbox"/>	Insufficient defence of interests/preparation for the hearing/not being present at the hearing (on time)
<input type="checkbox"/>	Acting without permission/consultation
<input type="checkbox"/>	Conflict of interests
<input type="checkbox"/>	A violation of duty of confidentiality, forwarding of information to third parties/the media, misuse of knowledge
<input type="checkbox"/>	Influencing/misleading counterparty/third parties/the court
<input type="checkbox"/>	Correspondence between colleagues/settlement negotiations/submitting other documents to the court
<input type="checkbox"/>	Fraud, forgery, other (incitement to) unlawful acts/bribery
<input type="checkbox"/>	Complaints relating to a case being taken over by a different lawyer
<input type="checkbox"/>	Intimidation, blackmail, threats
<input type="checkbox"/>	Wrongly refusing to provide legal assistance/withdrawing from the case
<input type="checkbox"/>	Non-fulfilment or frustration of agreements
<input type="checkbox"/>	Direct contact with the client of the counterparty/third parties
<input type="checkbox"/>	Other

<u>Class II: Complaints regarding substantive legal aspects of the services provided</u>	
<input type="checkbox"/>	Taking no or insufficient legal measures, failing to observe deadlines
<input type="checkbox"/>	Making errors relating to content, achieving an unsatisfactory result
<input type="checkbox"/>	No or incorrect advice/having insufficient knowledge

<input type="checkbox"/>	Ignoring client advice/instructions
<input type="checkbox"/>	Unnecessary litigation/performing pointless work/causing unnecessary costs for the complainant
<input type="checkbox"/>	Wrongly taking (other) legal measures
<input type="checkbox"/>	Wrongly seizing/filing for bankruptcy
<input type="checkbox"/>	Other

Class III: Complaints regarding financial aspects of the services provided

<input type="checkbox"/>	Excessive expense claims
<input type="checkbox"/>	Wrongly claiming expenses/charging/setting off advances or court registry fees
<input type="checkbox"/>	Insufficiently specifying bills
<input type="checkbox"/>	Claiming expenses despite counsel having been assigned
<input type="checkbox"/>	Other expense claim issues
<input type="checkbox"/>	Giving the client no or insufficient opportunity to use legal aid financed by the government
<input type="checkbox"/>	Failing to fulfil financial obligations with respect to the counterparty/third parties
<input type="checkbox"/>	Other issues relating to the assigning of counsel
<input type="checkbox"/>	Other

Class IV: Complaints regarding practices in general

<input type="checkbox"/>	Being impossible to contact/not answering telephone calls and letters (on time)
<input type="checkbox"/>	Not releasing dossier/losing documents

[]	Other
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Date of entry complaint file			
Referral to complaints official	[] Yes	[] No	Date:

STEPS TO BE TAKEN

By the lawyer involved	
By the complaints official	
Date of written response to client	

EVENTUAL CONCLUSION OF THE COMPLAINT

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Signatures	
Lawyer involved:	Complaints officer:

- The complaint must be submitted to the firm within three months after the client became aware, or reasonably could have become aware, of the action/omission by the lawyer which gave rise to the complaint.
- A complaint can be allocated to various classes.
- The firm must have dealt with the complaint in writing within four weeks after its submission.
- The client can submit the case to the Disputes Committee for the Legal Profession up to twelve months after the firm has dealt with the complaint in writing.
