

Office complaints procedure ELEMENT Advocaten

Article 1 Definitions

In this office complaints procedure, the following terms have the following meanings:

- *complaint*: any written expression of dissatisfaction from or on behalf of the client with regard to the attorney or the individuals working under the attorney's responsibility in connection with the formation and performance of an agreement to provide legal services, the quality of the services provided or the amount of the invoice, which is not a complaint as referred to in paragraph 4 of the Dutch Counsel Act;
- *complainant*: the client or their representative expressing a complaint;
- *complaints officer*: the attorney in charge of handling the complaint.

Article 2 Scope of application

1. This office complaints procedure applies to every agreement to provide legal services between ELEMENT Advocaten and the client.
2. Every attorney of ELEMENT Advocaten is responsible for handling complaints in accordance with the office complaints procedure.

Article 3 Objectives

The purpose of this office complaints procedure is to:

- a. establish a procedure to constructively handle client complaints within a reasonable period of time;
- b. establish a procedure to identify the causes of client complaints;
- c. maintain and improve existing relationships through proper complaint handling;
- d. train employees to respond to complaints in a client-oriented manner;
- e. improve the quality of services through complaint handling and complaint analysis.

Article 4 Information at the start of the service provided

1. This office complaints procedure has been made public. Before entering into the agreement to provide legal services, the attorney informs the client that the firm has an office complaints procedure in place and that this procedure applies to the service provided.
2. In the General Terms and Conditions, ELEMENT Advocaten has identified the independent party or body with which a complaint that has not been resolved after handling can be submitted in order to obtain a binding decision and has made this known in the engagement letter.
3. Complaints as referred to in Article 1 of this office complaints procedure that have not been resolved after handling will be submitted to the Dispute Resolution Committee for the Legal Profession.

Article 5 Internal complaints procedure

1. If a client contacts the firm with a complaint, the complaint is forwarded to an attorney who does not handle the file and who thus acts as the complaints officer. If attorneys are jointly involved in the handling of the file, the complaint will be handled by one of the attorneys involved.
2. The complaints officer notifies the individual regarding whom the complaint was submitted of the complaint and gives the complainant and this individual an opportunity to explain the complaint.

3. The person regarding whom a complaint was submitted will try to find a solution together with the client, whether or not after intervention by the complaints officer.
4. The complaints officer will handle the complaint within four weeks of receipt of the complaint or will inform the complainant of any deviation from this period, and the reasons for such deviation, stating the period within which an opinion on the complaint will be rendered.
5. The complaints officer will inform the complainant and the individual regarding whom the complaint was made, in writing, of the opinion on the admissibility of the complaint, possibly with recommendations.
6. If the complaint is concluded satisfactorily, the complainant, the complaints officer and the individual regarding whom the complaint was made sign the opinion on the admissibility of the complaint.

Article 6 Confidentiality and complaint handling free of charge

1. The complaints officer and the individual regarding whom the complaint was made will observe confidentiality in handling the complaint.
2. The complainant does not owe any fee for handling the complaint.

Article 7 Responsibilities

1. The complaints officer is responsible for the timely handling of the complaint.
2. The person regarding whom the complaint was made will keep the complaints officer informed of possible contacts and a possible resolution.
3. The complaints officer will keep the complainant informed of the handling of the complaint.
4. The complaints officer will maintain the complaint file.

Article 8 Complaint registration

1. The complaints officer registers the complaint, including the subject of the complaint.
2. A complaint can be divided into several subjects.
3. The complaints officer will regularly report on the handling of complaints and make recommendations to prevent new complaints and to improve procedures.
4. At least once a year, the reports and recommendations are discussed by the firm and submitted for decision-making purposes.