

### Halprin Law complaints procedure

Halprin Law is committed to the quality of its practice. We make every effort to provide the best possible service to our clients. Nevertheless, it may happen that a client has a complaint about an attorney, one of our staff members or the manner in which we conduct our practice. This complaint will be handled according to the following procedure.

#### 1. Definitions

1.1. In this complaint procedure the following definitions apply:

**complaint**: any written expression of dissatisfaction from or on behalf of the client towards the lawyer or the persons working under his responsibility about the conclusion and execution of an agreement for services, the quality of the services or the amount of the fee, not being a complaint as meant in paragraph 4 of the Act on Advocates;

**complainant**: the client or his representative who makes a complaint known;

complaints officer: the lawyer in charge of handling the complaint;

### 2. Scope of Application

- 2.1. These office complaint regulations apply to any contract for services between Avia Pervia B.V. acting under the trade name Halprin Law and the client.
- 2.2. Mr. P.E. Halprin will handle complaints in accordance with the office complaints procedure.

### 3. Objectives

- 3.1. The purpose of this office complaint scheme is to:
  - (i) to establish a procedure to deal constructively with client complaints within a reasonable period of time:
  - (ii) to establish a procedure to determine the causes of client complaints;
  - (iii) maintaining and improving existing relationships through proper complaint handling;
  - (iv) training employees in client-centered response to complaints;
  - (v) improving service quality through complaint handling and complaint analysis.

# 4. Information at the start of service provision

4.1. The application of this office complaint procedure is disclosed in the following manner. The procedure is provided to the client upon request and is available on the website. By making the procedure available on the website and referring to this procedure in the general terms and conditions, the client is aware and informed that the firm operates a complaints procedure and that it applies to the services provided.



- 4.2. Halprin Law has included in the contract of assignment through the general terms and conditions to which independent party or body a complaint that has not been resolved after treatment may be submitted to obtain a binding decision and has made this known at the time of assignment confirmation.
- 4.3. Complaints as referred to in article 1 of these regulations that are not resolved after treatment may be submitted to the District Court of Amsterdam.

### 5. Internal complaint procedure

- 5.1. If a client approaches the office with a complaint, the complaint will be forwarded to P.E. Halprin, who thus acts as complaints officer.
- 5.2. The Complaints Officer shall notify the person complained about of the filing of the complaint and shall give the complainant and the person complained about an opportunity to explain the complaint.
- 5.3. The person complained about will try to reach a solution together with the client, with or without the intervention of the Complaints Officer.
- 5.4. The Complaints Officer will process the complaint within four weeks of receiving it or will notify the complainant of any deviation from this deadline, giving reasons, and indicate the period within which a decision on the complaint will be made.
- 5.5. The complaints officer will notify the complainant and the person complained about in writing of the opinion on the merits of the complaint, whether or not accompanied by recommendations.
- 5.6. If the complaint has been settled satisfactorily, the complainant, the complaints officer and the person complained about will sign the judgment on the merits of the complaint.

### 6. Confidentiality and free complaint handling

- 6.1. The Complaints Officer and the person complained about will observe confidentiality during the complaint handling process.
- 6.2. The complainant shall not be charged for the costs of handling the complaint.

### 7. Responsibilities

- 7.1. The complaint officer is responsible for the timely resolution of the complaint.
- 7.2. The person complained about will keep the Complaints Officer informed about any contact and possible resolution.
- 7.3. The Complaints Officer shall keep the complainant informed about the resolution of the complaint.
- 7.4. The Complaints Officer shall maintain the complaint file.



# 8. Complaint registration

- 8.1. The complaint officer shall register the complaint along with the complaint subject.
- 8.2. A complaint may be divided into several subjects.
- 8.3. The Complaints Officer shall report periodically (if there has been the handling of complaints) on the handling of complaints and make recommendations for the prevention of new complaints, as well as for the improvement of procedures.
- 8.4. At least once a year, the reports and recommendations shall be discussed at the office and submitted for decision, provided that there has been the leg handling of complaints.

8.5. If applicable, the complaint will also be reported to the relevant liability insurer.