

Internal Complaints Handling Scheme Simmons & Simmons LLP the Netherlands (forming part of Article 6.28 of the Dutch Regulations for the Legal Profession (*Verordening op de advocatuur*))

Article 1 Definitions

In this Internal Complaints Handling Scheme the following terms will have the following meaning:

Complaint: any written communication expressing dissatisfaction from or on behalf of the client towards the lawyer or the persons working under his or her responsibility regarding the conclusion and performance of an engagement, the quality of the services provided or the amount of the note of fees, not being a complaint as meant in paragraph 4 of the *Advocatenwet* (Counsel Act);

Complainant: the client or its representative who files a complaint;

Complaints Officer: the lawyer responsible for handling the complaint.

Article 2 Scope

1. This internal complaints handling scheme governs any and all engagements concluded between Simmons & Simmons LLP the Netherlands and the client.
2. Each of the lawyers of Simmons & Simmons LLP the Netherlands will ensure that complaints are handled in accordance with this Internal Complaints Handling Scheme.

Article 3 objectives

The objectives of the Internal Complaints Handling Scheme are:

- a. establishing a procedure for handling client complaints in a timely and constructive manner;
- b. establishing a procedure for determining the causes of client complaints;
- c. retaining and improving existing client relations by establishing comprehensive complaints handling procedures;
- d. training staff in adopting a client-oriented approach to addressing complaints;
- e. improving the quality of our services using complaints handling and complaints analysis.

Article 4 information upon commencement of the engagement

1. This Internal Complaints Handling Scheme is available to the public. Prior to entering into the engagement, the lawyer will inform the client that the firm has an Internal Complaints Handling Scheme in place that applies to the services to be rendered.
2. Simmons & Simmons LLP the Netherlands has included in its general terms and conditions the name of the independent party or authority where the client may obtain a binding opinion in the event a Complaint has not been resolved.

Article 5 Internal Complaints Procedure

1. Any Complaints we receive from our clients will be dealt with by the Country Head for the Netherlands or any person to be appointed by this person, who will act as Complaints Officer.
2. The Complaints Officer will inform the person against whom the Complaint is made and will allow the Complainant and the person against whom the Complaint is made to express their views on the complaint.
3. The person against whom the Complaint is made will consult the Complainant in an effort to reach a solution, through the intermediary of the Complaints Officer or otherwise.
4. The Complaints Officer will settle the Complaint within four weeks of receipt of the Complaint or will notify the Complainant about a deviation from this term, stating the reasons for this deviation and stating the term within which the client will receive the firm's opinion on the Complaint.
5. The Complaints Officer will advise the Complainant and the person against whom the Complaint is made, in writing, of the opinion on the merits of the Complaint, which advice may be accompanied by recommendations.
6. If the Complaint has been dealt with satisfactorily, the Complainant, the Complaints Officer and the person against whom the Complaint is made will sign the opinion on the merits of the complaint.

Article 6 Confidentiality and complaint handling free of charge

1. The Complaints Officer and the person against whom the Complaint is made will observe confidentiality when handling the Complaint.
2. The Complainant will not be obliged to pay the costs of the complaints procedure.

Article 7 Responsibilities

1. The Complaints Officer will be responsible for a timely settlement of the Complaint.
2. The person against whom the Complaint is made will keep the Complaints Officer apprised of any communications and a possible solution.
3. The Complaints Officer will keep the Complainant apprised of the status of the complaints procedure.
4. The Complaints Officer will keep the complaints file.

Article 8 Complaints Registration

1. The Complaints Officer will register the Complaint and the issue(s) raised therein.
2. A Complaint may be divided into several issues.
3. The Complaints Officer will issue regular reports about complaints that have been settled and will make recommendations for preventing new complaints from arising and for improving procedures.

4. At least once a year, the reports and recommendations will be submitted and discussed internally for decision-making.