

## **Internal Complaints Handling Scheme Notaries Simmons & Simmons LLP**

### **Article 1**

#### **Definitions**

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

#### **Complaint:**

any written or oral communication reasonably to be marked expressing dissatisfaction from or on behalf of the client regarding the services of the Notary.

#### **Complainant:**

the client or its representative who files a complaint.

#### **Notary:**

a civil-law notary, assigned civil-law notary or candidate civil-law notary.

#### **Complaints Procedure:**

the at this firm applied procedure for the handling of complaints.

#### **Complaints Handling Scheme:**

this document, containing the written procedure of the firm's Complaints Procedure.

#### **Complaints Officer:**

the Person, not being the Notary against whom the Complaint was directed, who handles the Complaint, this being the Country Head for the Netherlands or a thereto by him designated person.

#### **Complaints Registration Form:**

an internal form to be used for the handling of the procedure of the Complaints Handling Scheme.

#### **Committee for Complaints to Notaries (*Geschillencommissie Notariaat*):**

the committee which has been instituted by the *Stichting Geschillencommissies voor consumentenzaken* (SGC) and the *Stichting Geschillencommissies voor Beroep en Bedrijf* (SGB) to which disputes can be addressed by the firm regarding contested and non-paid invoices and price-/quality disputes can be submitted if the solution of the firm does not lead to a satisfying outcome.

#### **Complaints- and dispute arrangement Notary (*Geschillenregeling Notariaat*):**

the procedure applied by the Committee for Complaints to Notaries to resolve disputes between Notaries and clients.

## **Regulations to the Committee for Complaints to Notaries (*Reglement Geschillencommissie Notariaat*):**

The regulations describing the procedure method of the Committee for Complaints to Notaries.

### **Article 2**

#### **Objectives**

The objectives of this Complaints Handling Scheme are:

1. to record a procedure for the handling of Complaints of clients within a reasonable term and in a constructive way.
2. to record a procedure to ascertain the causes of Complaints of clients.
3. to safeguard and improve current relationships by means of an adequate treatment of Complaints.
4. to train employees to respond to Complaints in a client dedicated way.
5. to improve the quality of the services by means of the procedure for Complaints and the analysis of Complaints.

### **Article 3**

#### **Informing the client**

The Notary:

- points out to the client that the firm applies a Complaints Handling Scheme.
- informs the client of the possibility to submit non-solvable problems to the Committee for Complaints to Notaries.
- reports to the client that the Regulations to the Committee for Complaints to Notaries can be requested for at the secretary of the the committee at the address Postbus 90600, 2509 LP Den Haag or the website: [www.degeschillencommissie.nl](http://www.degeschillencommissie.nl).

### **Article 4**

#### **Internal Complaints Handling Scheme**

1. If a client in any way approaches the firm with a Complaint, the Notary involved will need to be informed about this.
2. The Notary involved shall try to resolve the matter together with the client if necessary after consultation with the Complaints Officer.
3. The Notary involved respectively the Complaints Officer ensures for an adequate handling of the Complaint in accordance with the current Complaints Handling Scheme.
4. Confidentiality must be maintained in all circumstances.

5. The client will be informed on the decision to the Complaint.
6. If the Complaint is not handled in a satisfactory manner with the client, the issue will be submitted to the Committee for Complaints to Notaries.

## **Article 5**

### **Registration of Complaint**

1. All Complaints will be registered in accordance with the Complaints Registration Form.
2. The Complaints Officer registers the Complaint.
3. In case the Complaint has been dealt with in a satisfactory manner, both the Notary and the Complaints Officer will sign the Complaints Registration Form.

## **Article 6**

### **Responsibilities**

1. The involved Notary and the Complaints Officer thereafter are responsible for the handling of the Complaints.
2. The Complaints Officer is responsible for filling out in full the Complaints Registration Form.
3. The involved Notary will keep the Complaints Officer informed on the further handling of the Complaint.
4. The Complaint needs to be dealt with by the firm within four weeks.
5. The Complaints Officer arranges the response to the client.
6. The Complaints Officer maintains a file of the Complaints.

## **Article 7**

### **Analysis of the Complaints**

1. The Complaints Registration Forms will be collected after handling of the Complaint by the Complaints Officer.
2. The Complaints Officer reports periodically on the outcome of the handling of Complaints.
3. The Complaints Officer registers the details of the Complaints and prepares a yearly analysis thereof.
4. The Complaints Officer offers recommendations to prevent new Complaints, as well as to improve the procedures.

## **Article 8**

### **Internal discussions**

1. The details of the Complaints will be discussed at the firm once per year based on an analysis.
2. Measures for improvement will be prepared and planned.

## **Article 9**

### **Actions for prevention**

1. Based on the yearly analysis of the Complaints Officer the firm will decide to take actions for prevention in order to improve the quality of service.
2. The measures to be taken will be presented together with the analysis in a partner meeting.