

## Lumen Lawyers B.V. – Complaints Procedure

### Article 1. Definitions

The following terms bear the meaning assigned to them for the purposes of this complaints procedure:

- *complaint*: any written expression of dissatisfaction on the part or behalf of a client with a lawyer or any person working under their responsibility concerning the conclusion or execution of a letter of engagement, the quality of the relevant services or the amount stated in a bill, not being a complaint within the meaning of Section 4 of the Legal Counsel Act [*Advocatenwet*];
- *complainant*: a client or their representative who gives notice of a complaint;
- *complaints officer*: the lawyer who is responsible for dealing with the relevant complaint.

### Article 2. Scope of application

1. This complaints procedure shall apply in respect of every letter of engagement agreed to between Lumen Lawyers B.V. and a client.
2. Every lawyer at Lumen Lawyers B.V. shall be responsible for dealing with a complaint in accordance with this complaints procedure.

### Article 3. Purposes

The purpose of this complaints procedure is to:

- a. set out a procedure to deal with complaints submitted by clients constructively within a reasonable period of time;
- b. set out a procedure for establishing the causes of a client's complaint;
- c. retain and improve existing business relationships with the aid of proper complaints handling;
- d. train staff to focus on clients when responding to complaints;
- e. improve the quality of the services provided with the aid of complaints handling and analysis.

### Article 4. Information upon the commencement of services

1. This complaints procedure has been published on the website [www.lumenlawyers.nl](http://www.lumenlawyers.nl). Before agreeing to a letter of engagement, a lawyer will point out to a client that the firm has a complaints procedure and that it applies in relation to its services.
2. In its general terms and conditions Lumen Lawyers B.V. has stipulated the independent party or body to whom or which a complaint may be presented in order to obtain a binding decision if it is not resolved after being dealt with and it will disclose the same when confirming a letter of engagement.
3. A complaint referred to in Article 1 of this complaints procedure which is not resolved after being dealt with may be presented to the Consumer Complaints Board for the Legal Profession.

### Article 5. Internal complaints procedure

1. In the event that a client approaches the firm with a complaint, that complaint will be passed on to L.H.E. Møller, who will act as the complaints officer as such.
2. The complaints officer will notify the subject of a complaint that one has been submitted and will afford the complainant and the subject of the complaint an opportunity to provide an explanation in relation to the complaint.
3. The subject of a complaint will endeavour to find a solution together with the relevant client with or without the intervention of the complaints officer.
4. The complaints officer will deal with a complaint within four weeks after receiving it or will notify the complainant of any derogation from this deadline citing the reasons for this and mentioning the time when a ruling will be made on the complaint. The complaints officer will notify the complainant and the subject of the complaint in writing of a ruling as to whether the complaint is well-founded along with recommendations, if any.
5. The complaints officer will notify the complainant and the subject of the complaint in writing of a ruling as to whether the complaint is well-founded along with recommendations, if any.
6. Once the complaint is satisfactorily dealt with, the complainant, the complaints officer and the subject of the complaint will sign the ruling on the validity of the complaint.

**Article 6. Non-disclosure and complaints handling free of charge**

1. The complaints officer and the subject of a complaint will treat the handling of the relevant complaint in confidence.
2. The complainant will not be liable for a fee to cover the costs of dealing with their complaint.

**Article 7. Responsibilities**

1. The complaints officer is responsible for the timely handling of a complaint.
2. The subject of a complaint will notify the complaints officer of any contact and a potential solution.
3. The complaints officer will keep the complainant informed about the handling of the relevant complaint.
4. The complaints officer will maintain a complaints file.

**Article 8. Complaints record-keeping**

1. The complaints officer will record a complaint along with its subject matter.
2. A complaint may be broken down into multiple subjects.
3. The complaints officer will periodically report on the handling of complaints and will present recommendations to avoid new complaints, as well as to improve procedures.
4. No less than once a year, the reports and recommendations will be discussed in the office and presented for decision-making.