



Complaints Procedure

Crowe Peak

Audit / Tax / Advisory

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1. Definitions

The following definitions apply in this complaints procedure:

- a. accounting firm:**
Crowe Peak B.V., with its registered office in Rotterdam, registered in the Commercial Register under number 24468129, as well as the legal entities in which Crowe Peak B.V. holds a direct or indirect interest;
- b. board:**
the shareholders' meeting or another administrative body of our accounting firm that determines policy and makes decisions concerning all affairs of our accounting firm;
- c. Bta:**
Audit Firms (Supervision) Decree;
- d. partner:**
a person with the authorisation to assume obligations on behalf of the accounting firm regarding the performance of engagements in the area of professional services;
- e. employee:**
all persons who perform activities on the basis of an employment contract or other types of contracts and who are involved in the performance of engagements granted to our firm;
- f. network:**
the cooperation structure of our firm including the accounting firm, in accordance with the definition in the Bta;
- g. complaint:**
a written expression of displeasure regarding an act carried out by a partner or employee of our accounting firm or a person who is employed at a firm belonging to the network to which our accounting firm is affiliated;
- h. complainant:**
the person who submits a complaint;
- i. committee:**
the complaints committee referred to in point 3;
- j. compliance officer:**
the officer referred to in point 4;
- k. secretary:**
the officer referred to in point 3;
- l. complaint supervisor:**
the officer referred to in point 10.

2. Responsibility of the board

The board is responsible for the handling, registration and publication of complaints concerning partners and employees of our accounting firm or persons employed at a firm belonging to the network to which our accounting firm is affiliated.

3. Complaints committee

- a. The board may form a complaints committee for a specific complaint or on a permanent basis.
- b. The complaints committee consists at least of two independent members, who are not involved in the complaint in any way and who work at or who are affiliated with our accounting firm. At least one board member is represented on this committee.
- c. The board designates a board member as chairman and a secretary.
- d. The committee is charged with handling complaints and providing advice to the board concerning complaints that are not resolved in consultation with the complainant or by means of mediation.
- e. In the event the advice is not to handle a complaint, the committee will transfer the provision of advice to its chairman.
- f. The committee may provide the board with solicited or unsolicited advice regarding the handling of a complaint or about issues not included expressly in the complaint but which are relevant, or about issues justifying a complaint of which the committee is aware.
- g. The committee may determine further rules regarding its procedure in internal regulations.

4. Compliance officer

The board appoints a compliance officer to coordinate complaints handling, registration of the complaints that have been received, the procedural and substantive testing and the generation of management information.

5. Submission of a complaint

- a. A complaint must be submitted in writing and signed and contains at least:
 - the name and address of the person who submitted the complaint;
 - the date;
 - a clear description of the act against which the complaint is directed.
- b. Complaints submitted orally are put down on paper by the partner or employee of our accounting firm who speaks to the complainant at his request and forwarded to the board after it has been signed by the complainant.

6. Confirmation of receipt of the written complaint

- a. The compliance officer ensures that the person who submits a written complaint or whose complaint submitted orally was put down in writing is sent a confirmation of receipt and information about the complaints handling procedure within one week after it is received by the board. In the event a complaint is submitted to the committee for advice, the board will notify the complainant thereof as soon as possible.
- b. If a written complaint does not satisfy the requirements formulated in point 5, the complainant will be afforded the opportunity within two weeks after receipt thereof to remedy the failure within two weeks.
- c. It is not possible to complain anonymously.

- d. In the event the complainant does not rectify the failure within the aforementioned term of two weeks, the board will have the right to decide against handling the complaint. The complainant is informed thereof within two weeks after the aforementioned term of two weeks has ended.

7. Complaints relating to another part of the network

- a. In the event the complaint not only concerns the performance of a partner or an employee belonging to our accounting firm, but also to a partner or employee of another part of the network, the board will submit the complaint to the board of that organisation within one week after receipt.
- b. The further handling of the complaint will be determined in consultation with the board of the organisation in question. The board of our accounting firm notifies the complainant and the board of the network thereof.
- c. If the board of the network decides to assume the further handling of the complaint, it will inform all parties involved thereof.

8. Complaints handling

- a. Consultation with the complainant takes place within two weeks after a complaint is received. This consultations is intended among other things to determine whether the complaint can be handled by means of mediation and to determine to what extent the complaint qualifies for further handling.
- b. The consultation referred to in the previous paragraph does not have to take place if the board is of the opinion that such would not be useful in the case in question.
- c. The complaint is not handled further in the event consultation or mediation results in a solution that is satisfactory to the complainant. The complainant and the person whose conduct is the subject of the complaint are informed in writing of the termination of the handling of the complaint.
- d. The handling of the complaint is continued in cases in which consultation with the complainant or mediation does not lead to satisfaction of the complainant.

9. Handling and provision of advice on the part of the committee

- a. In the event the handling of the complaint has to be continued, the board will consider appointing a temporary committee for this purpose. The board informs the committee of all matters related to the complaint and sets a term for the committee in which advice is to be provided regarding the handling of the complaint.
- b. The committee reports to the board within the term set.
- c. In the event further information becomes available during the handling of the complaint, the board will inform the committee thereof without delay.
- d. All partners and employees involved in the handling of the complaint are subject to a duty of confidentiality.

10. Handling of internal complaints

- a. If the complaint was submitted by an internal officer, all officers involved in the handling of the complaint will be obliged to ensure that suspicions concerning the identity of internal complainants cannot arise.
- b. If so desired, the internal complainant may apply to the complaint supervisor, who will be appointed for this purpose by the board or the compliance officer.

- c. The board and the complaint supervisor ensure that the complainant, the committee members and any other persons involved in the handling of a complaint are not prejudiced in their legal or other position within the accounting firm.
- d. After the complaint has been handled, the committee is charged with informing within three to six months whether the complainant, the complaint supervisor and/or other parties involved are not adversely affected as a result of the complaint that was submitted.
- e. Unless this has been agreed with the complainant, the information relating to the complaint will not be included in his or her personnel file.

11. Adjournment

In the event the board does not succeed in settling a complaint within ten weeks or, if the complaint has been submitted to the committee for advice, within fourteen weeks after receipt of the written complaint, it will ensure that the complainant and the person whose conduct is the subject of the complaint are sent a notification of adjournment before the expiry of the applicable term.

12. Opinion of the board

- a. The board notifies the complainant in writing and provided with reasons of the findings of the investigation of the complaint as well as the possible conclusions it attaches to those findings.
- b. In the event other network organisations are involved in the complaint, the board will send them a copy of its settlement letter as well.

13. Registration of complaints

The board ensures that every written complaint is registered. The registration includes the following information:

- the name and address of the person who submitted the complaint;
- the date;
- a description of the act against which the complaint is directed.

The registration also includes information regarding the manner of submission and handling and settlement of the complaint, the processing time and, if applicable, the opinion of the board regarding any measures implemented pursuant to the complaint.

Insofar as the committee has provided advice regarding the complaint, this advice will also be included in the registration.

14. Internal publication

The board ensures that the information that has been registered referred to in the previous point is published annually within the accounting firm in an orderly and anonymised manner.

This publication is accompanied by an explanation that indicates to what extent certain complaints indicate structural failures in the operation of our organisation and that addresses possible measures to resolve the problems that have been identified.

15. Implementing regulation and mandate

- a. The board may adopt further rules for the implementation of the complaints procedure in the interest of careful, effective and efficient performance of the complaints handling.
- b. The board is authorised to mandate to the executive board in a mandate decision all powers that are necessary for effective and efficient complaints handling insofar as these are not exercised by the committee.
- c. The board has charged the compliance officer with supervising the implementation of the complaints procedure.

16. Short title

This procedure may be referred to as: the complaints procedure.

17. Effective date

This procedure replaces the complaints procedure dated 22 March 2011 and enters into effect at the moment it is published on the accounting firm's website.