

Complaints procedure

Introduction

The Dutch Decree on Conduct of Business Supervision of Financial Undertakings under the Wft stipulates that investment firms must have a procedure in place to adequately address complaints.

The complaints procedure is applicable on all complaints coming from clients in relation to services provided by AFS Interest B.V., AFS Equity & Derivatives B.V., AFS Energy B.V. and AFS Group B.V., hereafter AFS. The aim of this complaints procedure is to:

- detect possible dissatisfaction at an early stage
- solve a possible conflict in concert with the client
- get a better understanding of the perception and appraisal of AFS' services in order to improve the overall quality

Complaint

Should a client of AFS be dissatisfied with or have a complaint about the services provided by AFS, then the client can file a complaint with Compliance at AFS given that the complaint cannot be regarded as a misunderstanding.

Responsible person

At AFS the compliance officer is responsible for the treatment of the complaint. Compliance will see it that the complaint will be treated in a proper way and collects all related documents in a dossier.

The complaints dossier

Compliance collects all documentation relating to the complaint. The following information must be included:

- name and address of the complainer
- contact person at complainer
- filing date
- detailed description of the complaint
- Date at which the complaint was treated and way it was handled

Filing of the complaint

A complaint needs to be filed by regular mail or email. The address is:

AFS Group B.V.

Attn. COMPLIANCE

Beursplein 5

1012 JW Amsterdam

compliance@afsgroup.nl

The complaint should include the name and address of the complainer, the date of the incident and the date of complaint, a description of events that lead to the complaint and the rationale behind the complaint.

Confirmation of receipt of the complaint

After a complaint is filed, the responsible officer will confirm receipt to the complainer within two weeks by email or regular mail. The confirmation will include an indication of the time AFS needs to handle the complaint. AFS aims to handle any claim within 6 weeks.

Handling of the complaint

After having confirmed receipt of the complaint, the responsible officer will study the rationale and arguments. The officer will, in name of AFS, take a position about the complaint and will communicate this within the set timeframe to the complainer via email or regular mail.

The timeframe for handling the complaint can be extended one time with an additional six weeks. AFS will notify the complainer should such an extension be needed.

Rejection of the complaint

The complainer is entitled to start a procedure in civil court should the complaint be rejected by AFS.

Final provisions

All complaints are treated with strict confidentiality. The complaints dossier will be kept in filing for one year after the treatment. At the end of each calendar year the responsible officer will provide a report to management about the complaints filed that year.