COMPLAINTS PROCEDURE AXON LAWYERS

1. DEFINITIONS

Complaint Any remark, written or oral statement of dissatisfaction, or any

other expression that reasonably may be qualified as such made by / on behalf of the client regarding the services

rendered by Axon Lawyers.

Complainant The client or his representative who makes the Complaint.

Complaints Form The form used internally for the handling of the Complaint.

The person, not being the lawyer against whom the Complaint is addressed, responsible for the handling of the Complaint.

Complaints Procedure The procedure of the firm of handling Complaints.

2. PURPOSES

Complaints Officer

The purposes of the Complaints Procedure are:

- 2.1 to set out the manner in which to handle Complaints constructively within a reasonable term:
- 2.2 to put down a procedure for recording the causes of Complaints;
- 2.3 to maintain and improve client relations through proper handling of Complaints;
- 2.4 to train employees in a client focussed response to Complaints;
- 2.5 to improve the quality of Axon Lawyers' services by handling and analysing Complaints.

3. INFORMING OF THE CLIENT

- 3.1 Axon Lawyers points out in its General Conditions that it uses the present Complaints Procedure.
- The General Conditions as well as the Complaints Procedure can be viewed on and downloaded from Axon Lawyers' website.

4. INTERNAL COMPLAINTS PROCEDURE

- 4.1 If a client in any way approaches the office with a complaint regarding the services rendered by Axon Lawyers, then the lawyer involved will be informed.
- 4.2 The lawyer involved will try to work with the client towards a solution of the Complaint. He/she shall involve the Complaints Officer.
- 4.3 The lawyer involved respectively the Complaints Officer is responsible to properly handle the Complaint bearing in mind the present Complaints Procedure.
- 4.4 Axon Lawyers undertakes to maintain confidentiality regarding the handling of a Complaint under all circumstances.
- 4.5 The Complainant will be informed of the decision on the Complaint in due course.

5. REGISTRATION AND CLASSIFICATION OF THE COMPLAINT

5.1 All Complaints will be registered using the Complaints Form.

- 5.2 The Complaints Officer registers and classifies the Complaint according to manner of communication (oral or written respectively) and according to the kind of complaint as specified in the categories below:
 - Complaint about the method of working / treatment of the Complainant by the lawyer;
 - II Complaint about the legal content of the services;
 - III Complaint about the financial aspects of the services;
 - IV Complaint about the legal practice in general.
- 5.3 A Complaint may be classified in multiple categories.
- 5.4 A Complaint in category III only qualifies as such when the Complaints Officer does not reach a solution with the Complainant within three weeks after the first mention of it.
- 5.5 When a Complaint is handled to the satisfaction of the Complainant, the lawyer involved and the Complaints Officer sign the Complaints Form.
- 5.6 When according to the Complainant, the Complaint has not been handled in a satisfactory way, the Complainant is at liberty to submit said Complaint to the competent Court in Amsterdam.

6. RESPONSIBILITIES

- 6.1 The lawyer involved and then the Complaints Officer are responsible for the handling and settlement of Complaints.
- 6.2 The Complaints Officer is responsible for the completion of the Complaints Form and handling the Complaints file.
- 6.3 The lawyer involved will keep the Complaints Officer posted on the conclusion of the Complaint.
- 6.4 Axon Lawyers will use its best efforts to finalize the Complaint within four weeks upon receipt thereof.
- 6.5 The Complaints Officer takes care of the final response to the Complainant.

7. ANALYSIS OF THE COMPLAINTS AND INTERNAL DISCUSSION

- 7.1 The Complaints Officer collects the Complaint Forms after conclusion of the Complaint.
- 7.2 The Complaints Officer shall report to Axon Lawyers on the handling of complaints based on his/her analysis thereof on a yearly basis. He/she will make recommendations for the prevention of new Complaints, in part by improving procedures when need may be.

8. PREVENTIVE ACTION

- 8.1 On the basis of the yearly analysis of Complaints by the Complaints Officer, the management of Axon Lawyers shall decide about taking preventive measures to improve the quality of services, if any.
- 8.2 The improvement measures shall be incorporated in the present Complaints Procedure, when need may be, according to the reasonable judgement of the Complaints Officer.