

# **COMPLAINTS POLICY**

## **OWNERSHIP CAPITAL**

**January 2017**

## **1. INTRODUCTION**

The Complaints Policy of Ownership Capital B.V. explains the procedure for resolving Complaints. The procedure focuses on all Employees of Ownership Capital.

Complaints are handled by a person who was not involved in the action to which the Complaint relates. Therefore the Board has designated the Compliance Officer with the responsibility for Complaints and the monitoring of compliance with the procedure. In the event where a Complaint concerns the Compliance Officer, the responsibility for handling the Complaint is referred to the Chief Executive Officer (CEO).

## 2. DEFINITIONS

<b>Ownership Capital</b>	Ownership Capital B.V.
<b>Complainant</b>	The client or investor submits a complaint and/or his representative
<b>Complaint</b>	Any report from a client which indicates that the client's expectations were not met and which is not a misunderstanding or due to lack of information, and can be resolved quickly.
<b>Employee</b>	All references to "Employee" include: <ul style="list-style-type: none"><li>• Salaried Employee of Ownership Capital;</li><li>• Temporary staff; and</li><li>• Short or long term contractor.</li></ul>
<b>Compliance Officer</b>	The person to whom Ownership Capital has delegated responsibility for regulatory compliance. The Compliance Officer may delegate the supervision of the Policy to an external provider.
<b>Board</b>	The statutory directors of Ownership Capital.

### 3. PROCEDURE

This section deals with the different stages of the procedure for filing a Complaint and its resolution.

#### **Making a Complaint**

Complaints must be made in writing, including by e-mail, and are submitted to the Compliance Officer directly or to any other Employee of Ownership Capital. If the Complaint is submitted to an Employee of Ownership Capital not being the Compliance Officer, the receiving Employee will pass on the Complaint and its specifics to the Compliance Officer.

#### **Registration of Complaints**

The Compliance Officer records all Complaints made, dealt with and resolved in the Ownership Capital Complaints Register. The Compliance Officer keeps a file of each individual Complaint.

A Complaint must be signed by the Complainant and contain at least:

- the name and address of the Complainant
- the date
- a description of the event and/or person to which the Complaint relates

The description of the event and/or person to which the Complaint relates, must be sufficient, in the opinion of the Compliance Officer, to be able to consider the Complaint properly. Otherwise the Complainant is asked to provide the Compliance Officer with additional information.

Ownership Capital has the right not to consider a Complaint which has not been submitted in accordance with the requirements set out above even after repeated requests to the Complainant.

#### **Confirmation**

When a Complaint is to be investigated, the Compliance Officer will confirm the receipt of the Complaint and its investigation, including an estimation of the investigation period, in writing to the Complainant, within two weeks after submission of the Complaint.

The investigation period is based on the complexity of the Complaint and can be qualified as follows;

- Simple Complaints are handled within a period of six weeks, after submission; and
- Complex Complaints are handled within a period of three months, after submission of the Complaint.

If for any reason deviations occur and the estimated investigation period cannot be met, the Complainant will be informed timely by the Compliance Officer in writing, including the reason of delay and period in which the response of Ownership Capital may be expected instead.

Ownership Capital is not required to consider Complaints relating to an action which took place more than two years prior to the submission of the Complaint. Within four weeks after receipt of the Complaint, the Compliance Officer notifies the Complainant in writing that the Complaint is not considered.

## **Filing**

After receiving the Complaint the Compliance Officer records the Complaint and its specifics in the Ownership Capital Complaints Register and ensures that the following information is included in the Complainant's file:

- The Complainant's name and address details
- Date on which the Complaint was made
- Name of the person with responsibility for Complaints in the specific file
- Description of the Complaint

Once applicable:

- Correspondence conducted regarding the complaint; and
- Status of the Complaint (being handled/resolved)
- Date on which and manner in which the Complaint was resolved

## **Investigation**

After creating the Complaint file, the investigation commences. The Compliance Officer informs the department or Employee concerned about the Complaint to obtain relevant information. If the Complaint relates to an action of an Employee, the Compliance Officer can inform the Employee concerned about the Complaint that has been made.

The Complainant may require confidential handling of the Complaint by the Compliance Officer. The Compliance Officer can disregard this request on the Complainant's part if the Compliance Officer believes the request may obstruct handling of the Complaint.

Within the investigation the Compliance Officer:

- Assesses the case to which the Complaint relates and gathers additional information when deemed relevant;
- May obtain additional information from the Complainant;
- Challenges the Complainant's arguments by comparing these with the Complaint file and relevant obtained information;
- Can discuss the Complaint file and findings thereon with the COO as a check of his own interpretation; and
- Records his opinion on the Complaint in the file concerned supported by argumentation.

## **Resolution of the Complaint**

The Compliance Officer informs the Complainant in writing of the results of the investigation regarding the Complaint and the point of view of Ownership Capital. If the Complainant disagrees with the interpretation of the Compliance Officer on behalf of Ownership Capital, the Complainant can notify the Compliance Officer in writing hereof.

## **Contact details**

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