

**COMPLAINTS PROCEDURE**

**GENEBA PROPERTIES N.V.**

**December 2014**

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## **1. GENERAL**

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### **Article 1**

The following definitions apply in this procedure:

- a. Geneba: Geneba Properties NV;
- b. a complaint: any report from a Client which indicates that his expectations were not met and which is not a misunderstanding or lack of information which can quickly be resolved and of which it is clear - in view of the Client's disappointment - that this merits attention at a high level within the Geneba organisation;
- c. the complainant: the Client who submits a complaint and/or his representative.
- d. the Client; any stakeholder of Geneba, i.e. a shareholder, tenant, bank, employee, supervisory authorities or any other stakeholder

### **Article 2**

The complaint is dealt with by a person who was not involved in the action to which the complaint relates. The Managing Partners of Geneba have designated Geneba's Risk Manager as the person with responsibility for complaints. If the complaint relates to the Risk Manager, the CEO of Geneba will be the person with responsibility for the complaint. If the complaint relates to the Management Board, the complaint will be dealt with by the Supervisory Board.

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## **2. MAKING A COMPLAINT**

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### **Article 3**

Complaints can be made to Geneba by telephone, in writing or via electronic communication. A complainant can submit the complaint directly to the person with responsibility for complaints or to any other Geneba employee. If the complaint is submitted to an Geneba employee who is not the person with responsibility for complaints, the receiving Geneba employee will pass the complaint on to the person with responsibility for complaints to be dealt with.

### **Article 4**

A complaint made in writing or via electronic communication (email [info@geneba.com](mailto:info@geneba.com)) must be signed and contains at least:

- a. the name and the address of the complainant;
- b. the date;
- c. a description of the event to which the complaint relates.

The description referred to at c of this article must be sufficient, in the opinion of the person with responsibility for complaints, to be able to consider the complaint properly. The receipt of the complaint will be confirmed in writing within two week by Geneba.

#### **Article 5**

In case of complaints made by telephone, the person with responsibility for complaints might ask the complainant to submit the complaint in writing or via electronic communication in accordance with the requirements set out in article 4.

#### **Article 6**

Geneba has the right not to consider a complaint which has not been submitted in accordance with the requirements set out in article 3, even repeated requests to the complainant.

#### **Article 7**

If the complaint relates to an action of a person the person with responsibility for complaints can inform this person about the complaint that has been made. If the complainant does not wish this, the complainant must notify this to the person with responsibility for complaints. The person with responsibility for complaints can disregard this objection on the complainant's part if the person with responsibility for complaints believes that this is necessary for the proper handling of the complaint.

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### **3. HANDLING OF THE COMPLAINT**

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#### **Article 8**

Geneba is not required to consider the complaint if the complaint relates to an action which took place more than one year prior to the submission of the complaint. The complainant will be notified in writing that the complaint will not be considered as soon as possible but ultimately within four weeks of receipt of the complaint.

#### **Article 9**

If the complaint is to be investigated, the person with responsibility for complaints will confirm this in writing to the complainant.

#### **Article 10**

Simple complaints will be dealt with within six weeks of the complaint being made by means of a written response to the complainant. Complex complaints will be dealt with within three months of the submission of the complaint by means of a written response to the complainant. In the written communication as described in article 9, the person with responsibility for complaints will inform

the complainant whether the complaint is classified as a simple or complex complaint and how long the correspondingly period for dealing with it will be.

#### **Article 11**

If it is found that the time frame specified in article 10 cannot be met, the complainant will be informed of this in writing well before the end of this period. This communication must set out the reason for the delay and the period within which a response will be given.

#### **Article 12**

The person with responsibility for complaints:

- a. will study the dossier to which the complaint relates and will gather all other relevant information;
- b. may obtain further information from the complainant;
- c. will assess the dossier and the further information obtained and compares these with the arguments made by the complainant;
- d. can discuss the dossier with the CEO or a member of the Geneva Supervisory Board as a check on his/her own interpretation; and
- e. forms an opinion and records this view with reasoning in the complaint dossier.

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## **4. RESOLUTION OF THE COMPLAINT**

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#### **Article 13**

The person with responsibility for complaints will inform the complainant in writing and with reasons of the view taken on the complaint by the person with responsibility for complaints, on behalf of Geneva .

#### **Article 14**

If the complainant disagrees with the view taken by the person with responsibility for complaints on behalf of Geneva , the complainant can notify this in writing with reasons to the person with responsibility for complaints.

#### **Article 15**

If the exchange of views following the complainant's response as described in article 14 cannot be concluded to the satisfaction of the complainant or the person with responsibility for complaints and there is a permanent disagreement, the person with responsibility for complaints will inform the complainant of the possibility of submitting the complaint to the Klachteninstituut Financiële Dienstverlening (Financial Services Complaints Tribunal - KiFiD) within three months. However, although Geneva will take KiFiD's sentences very seriously, Geneva has not conformed itself to accept KiFiD's sentences.

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## 5. MANAGEMENT OF THE COMPLAINT

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### **Article 16**

The person with responsibility for complaints must ensure that at least the following information is included in a complainant's complaint dossier:

- a. the complainant's name and address details;
- b. date on which the complaint was made;
- c. name of the person with responsibility for complaints;
- d. description of the complaint;
- e. date on which and manner in which complaint was resolved;
- f. correspondence conducted with regard to the complaint; and
- g. status of the complaint (being dealt with/resolved).

### **Article 17**

Complaint dossiers are kept for at least one year after the complaint has been resolved by the person with responsibility for complaints on behalf of Geneba .

### **Article 18**

All complaints (made, being dealt with and resolved) are recorded centrally in the Geneba Complaints Register.