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# **Complaints Policy**

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Dated 1 February 2023

ALTFIN B.V.

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#### 1. General:

The purpose of the complaints procedure within AltFin is:

- Solving a problem of our customer
- Restoring the possibly damaged trust of our customer
- Improving our service based on lessons learned

The complaints procedure has been published on AltFin's website. In the agreements concluded with the customer, on behalf of the financier, there is a reference to our complaints procedure on our website.

This procedure must ensure that complaints are assessed and dealt with properly, in a structured and timely manner.

Complaints will also be used for further improvements of the service and the internal organization. AltFin strives for the highest possible level of quality and service. For this reason, it is essential to accept the complaint "unfiltered" and then to resolve the complaint (or have it resolved). For this reason, AltFin considers complaint management as an essential part of their operation.

The complaints procedure will be provided to all employees when they join the company.

Our Compliance Officer has been appointed as the complaints manager ('Complaints Manager') and is responsible for dealing with complaints that are received. The Compliance Officer manages the complaints register in which all complaints received by AltFin are recorded.

The complaints procedure is reviewed at least once a year.

The complaints register (including the data) will be kept for a period of 5 years after the complaint has been dealt with.

### 2. How to inform AltFin of a complaint

Should you want to inform AltFin of a complaint, you can inform AltFin in various ways:

- By telephone on 085-0783200
- By e-mail at info@altfin.nl, re. Complaint/Klacht attn. Complaints Manager
- By filling in the complaint form (request form by mail)
- In writing by sending a complaint letter to AltFin BV at the following address: AltFin B.V., Zuid- Hollandlaan 7, 2596 AL The Hague; For the attention of: The Compliance Officer

Please include the following in your complaint:

- a clear description of the complaint;

- your name, address, telephone number and (if possible) your email address;
- copies of any information that is relevant for the handling of your complaint.

### 3. The working method for dealing with a complaint:

Within 48 hours (weekends and compulsory days off are not included in this response time) after receipt of the complaint, the Complaints Manager will contact the Complainant by telephone. Receival of the complaint will be confirmed to the complainant and, if necessary, clarification of the complaint is requested by the Complaints Manager.

During this conversation, the complainant is also informed that the complaint, if not solved immediately, will be handled within 2 weeks and the customer will be contacted within 2 weeks for feedback.

After receipt of the complaint, the complaint will be registered in the complaints register. The Complaints Manager investigates the merits of the complaint. This will include investigating the performance of AltFin partner organisations in the end-to-end loan management process if applicable. The results of this investigation will be recorded in the complaints register. The Complaints Manager will handle the complaint independently.

If compensation is deemed necessary or there is potential reputation risk the Complaints Manager drafts a memo including appendices and screen prints to substantiate the validity of the complaint. In this memo, the Complaints Manager also gives his opinion on the merits of the complaint and makes a proposal on the handling of the complaint, including how to communicate with the customer.

This fully completed memo is submitted, together with the complaints register, to the directors of AltFin. The directors will take a decision on the basis of the memo. If the financier is involved in the complaint, the complaint will also be submitted to the Complaints Manager of the financier. AltFin and the financier will determine adequate actions together.

The Complaints Manager will ensure adequate follow-up of the decision taken on the complaint and will also capture the results in the complaints register.

If a complaint is rejected in whole or in part, the Complaints Manager will inform the complainant of the possibility of submitting the complaint to the SME Financing Foundation (Stichting MKB Financiering) or Kifid (Klachteninstituut Financiële Dienstverlening), when AltFin has subscribed to these organisations.

Each month, the complaints register is an item on the agenda of the AltFin board meeting. This is to ensure that the management is kept up to date on the number of complaints and the handling of the complaints (both solutions and timelines). In addition, the points for

improvement/suggestions are discussed here and actions are determined to implement improvements in the relevant process.

Financiers will have access to the complaints register for the complaints regarding their customers.

## 4. The complaints register:

The Complaints Manager will receive the complaint and register it in the complaints register.

The following information will be recorded in the complaints register:

- Date of receipt of the complaint
- Customer name, contact details, address, file number
- Clear description of the complaint
- Process to which the complaint relates
- If applicable date of informing the Complaints Manager of the Financier.
- Cause of the complaint
- Date of first reaction AltFin
- Date of feedback to the customer, including an explanation of what actions will be taken and when the complaint is resolved and when the customer is contacted again
- If applicable the decision of the Complaints Manager of the Financier and the necessary actions
- Date of final settlement
- Decision as to which processing has taken place
- If applicable the amount of compensation
- Date of verification with the customer whether the complaint has been resolved properly (service call or site visit)
- Improvement points for AltFin

Date of verification with customer whether the complaint is satisfactorily resolved:

• Within 3 working days the Complaints Manager contacts the customer by phone to inform whether the complaint has been satisfactorily resolved. If deemed necessary AltFin management visits the client on site. Improvement points for AltFin.

(Information about our complaints procedure is disclosed on our website:

'We do our utmost to always offer you the best service. That is why we value to hear from you when we have not completely met your expectations. If there are issues that you want to give us back, you can do so by e-mail; <a href="mailto:info@altfin.nl">info@altfin.nl</a>, re. Complaint/Klacht attn. Complaints Manager

As soon as we have received your feedback, we will contact you by phone within 48 hours. At the latest after 2 weeks we will contact you again about the next steps regarding your feedback. We aim to have your feedback fully processed and your complaint resolved.')