Atradius
Dutch State Business

Guidelines for filing a complaint

Wat doet Atradius Dutch State Business?

Atradius Dutch State Business N.V. (Atradius DSB), a wholly owned subsidiary of the Atradius Group, implements the Dutch export credit facility on behalf of the Dutch State. Atradius DSB provides a range of insurance and guarantee products designed to minimise the risk of non-payment for exporters of capital goods, internationally operating construction companies, banks, and investors. By mitigating these risks, Atradius DSB enables Dutch companies to successfully conduct export transactions. Unlike a bank, which provides financing in the form of loans, Atradius DSB does not have a direct contractual relationship with the customers of the Dutch exporter (i.e. the buyers).

Why does Atradius DSB have a complaints mechanism?

We are committed to delivering high-quality services to all our stakeholders, including those who make use of our products and services, such as Dutch exporters and financial institutions. However, we recognise that no organisation is perfect and that you may have a complaint regarding our organisation, our products or services, or the projects we support. The primary purpose of the complaints mechanism is to assess complaints relating to the actions or omissions of Atradius DSB.

Atradius DSB welcomes complaints, not only because we aim to resolve the matter to your satisfaction, but also because we seek, through investigation and analysis, to determine whether complaints relate to incidental shortcomings or more structural issues. This process enables us to further improve and optimise our products, procedures, and services. In addition, we may be able to assist in resolving issues that arise directly from our own actions or decision-making. As part of the environmental and social due diligence of the projects we support, we assess whether the project for which the Dutch exporters' goods or services are intended has an operational-level grievance mechanism in place. Such a mechanism enables local stakeholders to raise concerns and grievances related to the project. A well-designed operational grievance

mechanism increases the likelihood of satisfactory local resolution. However, if such a mechanism is not accessible and the complaint relates to a transaction insured by Atradius DSB, our own complaints mechanism may be invoked. In such cases, our approach to handling the complaint will be fair, objective, and impartial.

Who can submit a complaint?

Complaints may be submitted by individuals, groups, companies, communities and other parties who are or may be concerned about the activities of Atradius DSB or the projects we support.1

Complaints may, for example, be submitted by:

- stakeholders making use of our products and services, such as exporters and financial institutions; or
- any individual residing in the project area or having an economic or other interest in the area, such as project employees, local communities, or those who depend on the area for their livelihood. They may submit a complaint provided they can demonstrate that they are, or may be, affected by activities or impacts related to an export contract covered by Atradius DSB.

Can someone represent me and/or my community?

Yes. If an individual or organisation submits a complaint on your behalf, that representative or organisation must provide written evidence that you have authorised them to represent you.

Admissibility criteria

Atradius DSB considers it essential that the complaints mechanism is effective. In practical terms, this means that we can only consider complaints that directly relate to alleged acts or omissions by Atradius DSB in connection with its own policies and the applicable legal frameworks.

Where applicable, the following criteria must be met:

- Plausibility of alleged misconduct: complainants must provide sufficient substantiation that there has been an act or omission by Atradius DSB;

[1] Category A projects under consideration are published on our website prior to the provision of cover. During this ex-ante disclosure period, third parties can provide input or raise concerns they may have in relation to the project. Such concerns are not treated as complaints but form part of our consultation process to inform our due diligence. Please refer to our Information Disclosure Policy (IDP) and our Environmental & Social (E&S) policy document for further details on this procedure.

- Submission deadline: a complaint can only be considered if it is submitted no later than 12 months after the export activity covered by Atradius DSB has been carried out;
- Local attempts at resolution: complainants must demonstrate that efforts have first been made to resolve the issue locally through dialogue with directly involved project parties;
- Scope of the complaint: complaints regarding non-compliance with (inter)national obligations or improper conduct by a third party, such as a project owner, companies involved in the project, or governments, will only be considered if Atradius DSB is able to exercise direct leverage over these parties on the basis of the applicable (insurance) agreement.

Can I submit an anonymous complaint?

Anonymous complaints may be submitted. However, this may limit the scope of our investigation. As part of our complaints procedure, we aim to engage in dialogue with the complainant to assess and, where possible, resolve the issue. Contact details are therefore required to facilitate this process.

Can I request that my information be treated as confidential?

Yes, this is possible. Please indicate in your complaint whether you wish your identity and/or the information provided to be treated as confidential. Such information will not be disclosed without the consent of the party that provided it.

What can the complaint relate to?

A complaint may relate to:

- the conduct of Atradius DSB staff, the handling of information, the application process and/or the outcome of this process;
- a failure by Atradius DSB to comply with its own policies;
- adverse environmental and social impacts, human rights violations, or other harmful effects that affect the complainant and are associated with Dutch export transactions or financing covered by Atradius DSB insurance;
- matters such as fraud, bribery, corruption and/or money laundering that can be linked to Dutch export transactions or financing insured by Atradius DSB.

How can I submit a complaint?

Complaints may be submitted in writing, by email or by post.

You may submit your complaint in English or Dutch via:

- e-mail: complaints.dsb@atradius.com;
- post: t.a.v. Klachtenmanager, Atradius Dutch State Business, Postbus 8982, 1006 JD Amsterdam, Nederland;
- You will receive an acknowledgement of receipt of your complaint within two working days.

What information should I include in my complaint?

When submitting a complaint, we kindly request that you include the following information:

- your name and contact details, including the country in which you reside. If you choose to remain anonymous, please note that we may not be able to verify information or engage in dialogue;
- whether you request that your identity and/or the information provided be treated as confidential;
- where applicable: the name, contact details and proof of authorisation of the representative acting on your behalf;
- the nature and location of the project concerned and its name (if known);
- as detailed a description as possible of the harm, impact or risk experienced that affects or may affect you. If you have relevant documents or evidence of the harm or its impacts, please include these with your complaint;
- a description of the steps already taken to address the harm, impacts or risks, or to resolve the situation;
- where applicable, an indication of which Atradius DSB policies may have been breached;
- what you hope to achieve with your complaint, i.e. the outcome or remedy you are seeking;
- where applicable, an overview of steps already taken and any engagement with relevant responsible parties to address or resolve the complaint.

What happens after a complaint has been submitted?

The following steps will be taken after you have received our acknowledgement of receipt of the complaint:

A. Registration and admissibility assessment
B. Assessment of the complaint
C. Resolution of the complaint (where possible)

A. Registration and admissibility assessment of your complaint

All complaints submitted to Atradius DSB are registered and assigned an identification number to ensure proper management. The Complaints Manager will determine whether the complaint falls within the scope of Atradius DSB's complaints mechanism, and you will be informed without delay once the complaint has been deemed admissible.

The Dutch State will also be informed, as Atradius DSB acts on its behalf. If the complaint is found to fall outside the scope of our activities, you will receive a written explanation outlining the reasons for this decision.

B. Assessment of the complaint

The Atradius DSB Complaints Manager will assess the complaint to determine how it should be handled.

The Complaints Manager will:

- contact the complainant to obtain a comprehensive understanding of the nature and background of the complaint;
- liaise with relevant departments within Atradius DSB to verify information related to the transaction referred to in the complaint;
- following review of the information, involve other Atradius DSB staff in the assessment and, where necessary, engage an independent consultant.

Following the assessment, advice will be provided on how to proceed with the complaint.

Three possible pathways are distinguished:

1. Problem-solving: Atradius DSB may support the complainant in resolving an issue arising from our actions or decision-making. The Complaints Manager will act as a facilitator between the complainant and the party that may be able to resolve the issue.
2. Compliance audit: an investigation into and assessment of compliance with Atradius DSB policies, procedures, or applicable (inter)national standards and obligations.
3. No further action possible.

The outcome of the assessment and the proposed course of action will be discussed with the complainant. The complainant will also have the opportunity to indicate whether the proposed follow-up is considered appropriate.De Klachtenmanager van Atradius DSB zal de klacht beoordelen om te bepalen hoe deze moet worden behandeld.

C. Follow-up of the complaint

Under the problem-solving pathway, Atradius DSB will facilitate a dialogue between the relevant parties with the aim of reaching agreement on a resolution. Where appropriate, an external mediator may be engaged to support this process. The proposed solution may, where necessary, be submitted to the Dutch State or the management of Atradius DSB for approval. Once agreement has been reached, the Complaints Manager will monitor the implementation of the agreed arrangements.

Under the compliance audit pathway, the Complaints Manager will assess the extent to which applicable policies, procedures, or (inter)national obligations have been complied with. Depending on the nature of the complaint, the applicable assessment framework will be clearly specified. In the case of complex or environmental and social (E&S) related complaints, external expertise may be engaged. Where non-compliance is identified, the Complaints Manager will develop an action plan to prevent recurrence and will monitor the implementation of this plan.

Outcome of the complaints procedure

The Atradius DSB Complaints Manager may close a complaint once a solution satisfactory to both parties has been reached. A complaint may also be closed if it appears that further efforts to reach a solution would not be meaningful or productive. The complainant and the Dutch State will be informed of the decision in writing. Monitoring the implementation of the agreed solution may form part of the outcome of the complaints procedure.
If your complaint has not been resolved to your satisfaction, you may refer the complaint to the Dutch State. We kindly request that you inform Atradius DSB accordingly.

Please use the following contact details:

- Ministry of Finance – EKI Department
- P.O. Box 20201 2500 EE The Hague
- Email: ADSB-klachten@minfin.nl

Internal reporting

The Atradius DSB Complaints Manager will report regularly to the Atradius DSB Management Team and the Group Complaints Manager on the progress made in handling all complaints, with particular attention to:

- recommendations for concrete actions to address specific issues identified in complaints and to improve our processes;

- lessons learned from dialogue or mediation processes that have not been successful and for which no further action can be taken.

Confidentiality and disclosure

The complaints mechanism prioritises the confidentiality of information over the actual outcome or result. The rationale is that an open and flexible approach to resolving issues is more likely when the process is conducted with an appropriate level of confidentiality. Accordingly, communications exchanged during the process will be treated as confidential.

Similar restrictions apply when confidential business information is received during investigations. For transparency purposes, Atradius DSB will include in its annual report the number of complaints received and how these are being handled. Once a complaint has been concluded, the outcome may also be published, taking into account confidentiality considerations.

Is there a specific timeframe for the process?

The overall duration of the complaints handling process depends on its complexity. As an indication, complaints are generally concluded within 12 months of receipt, while complex or environmental and social (E&S) related complaints are expected to be concluded within 24 months.

For the initial phases of the complaints procedure, the following indicative timelines apply:

A. Registration and admissibility assessment: 10 working days
B. Assessment of the complaint: 60 working days
C. Follow-up of the complaint: depending on the proposed pathway, an indicative timeframe will be provided to the complainant. In longer processes, complainants will be kept informed of progress and expected timelines throughout.

How does Atradius DSB ensure sufficient independence in handling my complaint?

The Atradius DSB Complaints Manager is responsible for ensuring the impartial handling of complaints. In the event of a conflict of interest with the Complaints Manager's other responsibilities, or where independence may otherwise be compromised, responsibility will be assumed by the Management Board of Atradius DSB, supported by the Group Complaints Manager. If the complaint concerns the

Atradius DSB Management Board itself, the Group Complaints Manager will be responsible for the assessment.

Atradius DSB's Compliance Manager will oversee whether the procedure is followed correctly. Any deviations from the procedure will be reported to the Atradius DSB Management Board and the Group Compliance Manager.