

Guidelines

for submitting a complaint

What does Atradius Dutch State Business do?

Atradius Dutch State Business NV (ADSB), a wholly-owned subsidiary of the Atradius Group, manages the Netherlands' official export credit facility on behalf of the Dutch State. ADSB offers a range of insurance and guarantee products designed to minimise the risks of non-payment for exporters of capital goods, internationally operating construction companies, banks and investors. By insuring against these risks, we enable export transactions of Dutch companies. However, unlike a bank providing a loan, ADSB has no direct formal business relationship with the clients of the Dutch exporter, i.e. their buyers.

Why does ADSB have a complaint mechanism?

As explained in ADSB's Corporate Social Responsibility (CSR) Statement, Human Rights Statement and Environmental and Social Policy document¹, we aim to be as transparent as possible and to ensure accountability for our activities and our dealings with stakeholders. We aim to provide high quality service to all our stakeholders, such as those who make use of our products and services: the Dutch exporters and financing institutions. However, we realise that 'nobody is perfect' and that you might have a complaint about us, our products or services, or the projects that we support.

Indeed, ADSB welcomes any complaints you may have, not only because we hope to resolve

the matter to your satisfaction, but also, through investigation and analysis, we aim to establish whether complaints relate to incidental mistakes or errors on our part or to more systemic issues. This of course then helps us to optimise our products, procedures and services and, insofar as we can exert an influence, to contribute to preventing or addressing social or environmental issues in the projects that we support.

We have a due diligence process in place to identify and assess the financial risks and the environmental, social and human rights impact of our insured export transactions. As part of this due diligence process, we investigate whether the project, where the Dutch exporters'

¹ [https://atradiusdutchstatebusiness.nl/en/article/csr-\(corporate-social-responsibility\).html](https://atradiusdutchstatebusiness.nl/en/article/csr-(corporate-social-responsibility).html)

goods or services are destined to, has an operational-level grievance mechanism, so that local stakeholders can report their complaints and grievances about the project.

A well-designed operational-level grievance mechanism increases the chances of a satisfactory local resolution of grievances. However, if that mechanism is inadequate, or if the complainant fears some form of retaliation, and the complaint is linked to an ADSB-insured transaction, our own complaints mechanism comes into play. When that happens, our approach to any such complaint will always be fair, objective and equitable.

Who can file a complaint?

Complaints can be lodged by individuals, groups, companies, communities and other parties that are or might become concerned about the activities of ADSB itself or the projects we support².

For example, complaints can be submitted by:

- stakeholders that make use of our products and services, such as exporters and financial institutions; or
- anyone living in the area of operations or who has an economic or other interest in the area: including project workers, local communities or those whose livelihoods derive from the area of operations. They may submit a complaint provided that they can demonstrate that they will be affected by the activities or impact of operations related to an export contract covered by ADSB.

Can someone represent me and/or my community?

Yes. When an individual or an organisation files a complaint on your behalf, that representative or organisation should provide written evidence that you have given them authority to represent you.

Can I file an anonymous complaint?

Anonymous complaints can be filed. However, this may limit the scope of our investigation. As part of our complaint procedure, we like to enter into a dialogue with the complainant to assess and, if possible, resolve the issue, but of course contact details are necessary for us to do so.

Can I ask for my information to be treated as confidential?

Yes, you can. Please state in your complaint whether you wish your identity and/or the information provided to be kept confidential. This information will not be released without the consent of the party who provided it³.

What can the complaint be about?

The complaint may be about:

- the functioning of ADSB personnel, treatment of information, the application process and/or the outcome of this process;
- a failure by ADSB to comply with its own policies;
- negative environmental and social impacts, human rights violations or other detrimental impacts, which affect a complainant and are linked to the operations where a Dutch export or financing is covered by ADSB Export Credit Agency (ECA) insurance; and
- issues such as fraud, bribery, corruption and/or money laundering, linked to a Dutch export or financing covered by ADSB ECA insurance.

How can I file a complaint?

Complaints must be submitted in writing, by e-mail, post or using the online form provided on ADSB's website. You may submit the complaint in English or Dutch via:

- e-mail: complaints.dsb@atradius.com
- mail: Attn. Complaints Manager, Atradius Dutch State Business, P.O. Box 8982, 1006JD Amsterdam The Netherlands
- website: <https://atradiusdutchstatebusiness.nl>

We will send you confirmation of receipt of the complaint within two working days.

What information do I need to include in my complaint?

Please include the following information when you are submitting a complaint:

- your name and contact information, including country of residence. If you opt to remain anonymous, please be aware that we may not be able to verify information and we cannot enter into a process of dialogue;
- whether you wish your identity and/or the information provided to be kept confidential;
- if relevant, the identity, contact information and proof of the representative's authority to represent you;
- the nature and location of the project in question and its name (if known);
- details of the perceived harm, impact or risk in as much detail as possible and how you are or could be affected. If you have any documents deemed relevant or evidence about the harm or impact, please attach these to your complaint;
- a description of the steps that have already been taken to address the perceived harm,

² Category A-projects that we have under consideration are published on our website prior to providing cover. During this ex-ante disclosure period third parties have the opportunity to provide input or raise concerns they may have in relation to this project. These concerns will not be treated as complaints but are part of our consultation process to inform our due diligence. For this procedure, please see our Information Disclosure Policy (IDP) and our E&S Policy Document

³ The protection of personal data is ensured under the Freedom of Information Act which is applicable to the services ADSB provides on behalf of the Dutch State.

- impact or risk or to resolve the situation;
- if relevant, an indication of which of its policies ADSB has allegedly breached;
- what you hope to achieve with your complaint: i.e. the resolution or remedy you are seeking;
- if applicable, and any other actions and consultations with relevant responsible parties to address or solve the complaint that have already taken place.

What happens after a complaint is filed?

The following steps are taken after you receive our confirmation of receipt of the complaint:

- Acknowledgement of the complaint
- Screening of the complaint
- Assessment of the complaint
- Resolution (if possible)

A. Acknowledgement of your complaint

Complaints directed at ADSB are all recorded and given an identification number to help ensure that they are properly administered. Our Complaints Manager will determine if a complaint falls within the scope of ADSB's complaints mechanism and you will be notified immediately when a complaint has been accepted. The Dutch State will also be notified, since ADSB is acting on its behalf. If the complaint is found to be outside the scope of our activities, you will receive a letter outlining the rationale behind that decision.

B. Screening of the complaint

ADSB's Complaints Manager will screen and evaluate the complaint to determine how it should be handled. The Complaints Manager will:

- contact the complainant(s) to obtain a full understanding of the nature of and background to the complaint;
- contact the relevant departments within ADSB to verify relevant information about the operations that the complaint is referring to.

This screening concludes with a decision on how to proceed and an outline of the course of action proposed.

C. Assessment of the complaint

Based on the screening of the complaint, the ADSB Complaints Manager will assess if and how the complaint may be resolved. During this assessment, the complainant will be consulted and it may be that additional information is required to assess the complaint further. The Complaints Manager may also involve other ADSB staff and, if deemed necessary, an independent consultant. The outcome of the assessment will be discussed with the complainant.

D. Resolution of the complaint

Depending on the nature of the complaint, ADSB's assessment and consultation with the complainant, several options may be recommended to resolve the issue. For instance:

- action by ADSB;
- dialogue;
- mediation with the help of an external mediator;
- compliance audit.

Outcome of the complaints procedure

ADSB's Complaints Manager can conclude or close a complaint if a resolution that satisfies both parties has been reached. If it is felt that further investigation or problem solving would not be useful or productive, the complaint may also be closed. The complainant and the Dutch State will be notified of the decision in writing.

Monitoring of the resolution can be considered as a part of the outcome of the complaints procedure.

If the complaint is not resolved to your satisfaction, you can refer the complaint to the Dutch State:

Ministry of Finance
Afdeling EKI
P.O. Box 20201
2500 EE Den Haag
Email: adsb-klachten@minfin.nl

Internal reporting

The ADSB Complaints Manager will report regularly to the ADSB Management Team and the Group Complaints Manager on the progress of all complaint cases, focusing specifically on:

- recommendations for future action, which may address specific concerns in a complaint and improve our processes;
- lessons learned from attempts to hold dialogue or mediation which were not successful and for which no further action is possible.

Confidentiality and disclosure

The complaint mechanism gives priority to the confidentiality of information above the actual product or outcome. The reasoning behind this is that an open and flexible attitude towards problem solving is more likely if the resolution process is conducted with a reasonable level of confidentiality. Therefore, communication with parties during the course of that process will be regarded as privileged. Similar constraints will apply when confidential business information is received during investigations.

For the purpose of transparency, ADSB will include in its Annual Report the number of complaints received, and any outcomes realised, with the consent of the parties involved.

Is there a specific timeframe for the process?

At the start of the process, the ADSB Complaints Manager will discuss the timeframe with the complainant. The initial phases of the process have the following timeframes:

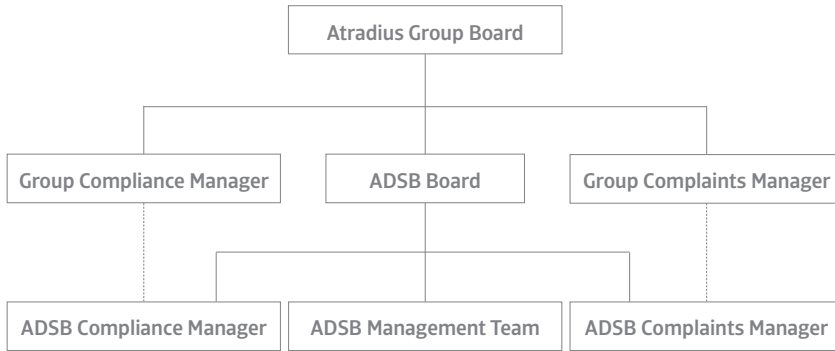
- Acknowledgement of receipt: 2 working days
- Screening of the complaint: 10 working days
- Assessment: 30 working days
- Resolution: depending on the outcome of the assessment

How does ADSB guarantee sufficient independence in the treatment of my complaint?

The ADSB Complaints Manager is responsible for unbiased treatment of the complaint. After assessment of the complaint, ADSB's management team will

review the proposed outcome. If there is a conflict of interest with the Complaints Manager's other activities, ADSB's Board will be responsible, supported by the Group Complaints Manager. If the complaint is about the ADSB Board itself, the Group Complaints

Manager will be responsible for assessing of the complaint. ADSB's Compliance Manager will monitor if the procedure is followed correctly. Possible deviations to the procedure will be reported to ADSB's Board and the Group Compliance Manager.



Atradius
David Ricardostraat 1
P.O. Box 8982, 1006 JD Amsterdam
The Netherlands
Phone 020 553 2693

Traderegister Amsterdam 33226495
Registered:
Atradius Dutch State Business NV
www.atradiusdutchstatebusiness.nl