

Complaints & Reporting Procedure

Dutch Good Growth Fund, Financing Local SMEs

Chapter 1 – General Provisions

Article 1.1 - Applicability

This Procedure applies to all persons working for Dutch Good Growth Fund (hereafter "DGGF") as well as to any Complainant as defined in Article 1.2 of this Procedure.

Article 1.2 – Definitions

For the purposes of this Procedure, the terms listed below will have the meanings set next to them:

Affected person(s)/party	The person(s) against whom a Complaint is filed.
Complaints Committee Chairman	A person whose duty it is to consider and investigate Reports and provide the DGGF Complaints Committee with an intended decision on the handling of the Complaint. The Chairman reports to The Foundation.
Complaints Committee Member	A member whose duty it is to advise the DGGF Complaints Committee Chairman, upon request by the Chairman.
Complainant	Any person or third party filing a Complaint or reporting a (possible) Suspicion of business wrongdoing or a Suspicion of an Incident.
Complaint	The disclosure by a Complainant to the DGGF Complaints Office for that purpose under this Procedure of a situation or an Incident with which he/she has been confronted.
Complaint File	The File sent by the Complainant including the Complaint, decision including recommendations and supporting evidence if applicable.
Complaints Register	The Complaints Register consists of all open and closed Complaint Files.
Deputy PwC Team Coordinator	Coordinator of the daily operational DGGF team within PwC.
DGGF	Dutch Good Growth Fund, part two, financing local Small and Medium sized Enterprises (SMEs). DGGF is a revolving fund established by the Dutch government in order to combine international trade and development aid. Part two focusses on investments in SMEs in low and middle income countries.
DGGF Complaints Committee	A joint committee consisting of two Complaint Committee Members and the Complaints Committee Chairman, whose duty it is to consider and investigate Complaints and to advise on the handling of Complaints.
DGGF Complaints Office	A joint committee consisting of the Complaints Committee Chairman and a secretary.

Incident	A violation of a rule of law that forms a threat to DGGF's sound business management and that may damage public trust in DGGF as a fund or in the financial markets as a whole.
The Foundation	Foundation 'Stichting fondsbeheer DGGF lokaal MKB'. This foundation is the entity that makes the DGGF investments and acts as contract party for the IFs. The foundation is registered with the trade register of the chamber of commerce under number 61172863 (RSIN 854239066) and has its statutory seat in The Hague. Its directors are PricewaterhouseCoopers Advisory N.V. (PwC) and Triple Jump BV (TJ).
Procedure	This Complaints and Reporting Procedure.
PwC Team Coordinator	Coordinator of the Deputy PwC Team Coordinator and its operational DGGF team within PwC.
Suspicion of an Incident	A suspicion based on reasonable grounds of a (threatened) violation of a rule of law that forms a serious threat to DGGF's sound business management and that may damage public trust in DGGF as a fund or in the financial markets as a whole.
Suspicion of wrongdoing	A reasonable suspicion of (threatened) wrongdoing affecting the business wrongdoing of DGGF's organization, and consisting of any or all of the following incidents, not being a Suspicion of an Incident as referred to in this Procedure: <ul style="list-style-type: none"> • a (threatened) violation of a rule of law, rule of conduct and/or any work or other instruction, as formally adopted or issued (directly or indirectly) by DGGF, but not limited to: • (threatened) deliberate supply of incorrect information to the public authorities; • (threatened) waste of the DGGF's money or funds; • (threatened) deliberate destruction, manipulation or withholding of information about any of the above incidents from third parties.

Article 1.3 – General

This Procedure describes how persons/parties can file a complaint against DGGF and how this complaint is handled. Subject to any evidence to the contrary, the Complainant filing a Complaint in accordance with this Procedure will be deemed to be acting in good faith and not to be out to gain any purely personal advantage.

Article 1.4 – DGGF Complaints Committee and Office

1. A DGGF Complaints Committee has been set up to consider and investigate Complaints, consisting of a Chairman and two external members
2. The DGGF Complaints Office will be composed of the Complaints Committee Chairman and a secretary
3. Decisions by the DGGF Complaints Committee will be adopted by the Complaints Committee Chairman, only after the adversarial process has been completed and at least one member of the DGGF Complaints Committee has signed off on the decision.
4. The Foundation will form the DGGF Complaints Committee by appointing a Complaints Committee Chairman from PwC and two additional Complaints Committee Members (of which one will be appointed as advised by Triple Jump and one as advised by PwC). The Complaints Committee Chairman is not part of the operational DGGF organization.
5. The Complaints Committee Chairman will be appointed for a period of three years, with the option of reappointment.
6. In exercising his/her duties, the Complaints Committee Chairman will report to The Foundation.
7. In the event of one of the Complaints Committee Members being absent or otherwise engaged, a deputy member as appointed by the same body as the absent Complaints Committee Member was appointed by, may take his/her place.
8. Complaints Committee Membership, or the position of secretary, will terminate:
 - at the request of the (deputy) Complaints Committee Member, (deputy) Complaints Committee Chairman or secretary;
 - if relieved of his/her duties by the Complaints Committee Chairman if the member was appointed by the Complaints Committee Chairman;
 - if relieved of his/her duties jointly by the sitting Complaints Committee Members and the Complaints Committee Chairman if the secretary was jointly appointed by the sitting Complaints Committee Members and the Complaints Committee Chairman;
 - at the same time as the employment contract or accession agreement between the (deputy) Complaints Committee Member, (deputy) Complaints Committee Chairman or secretary and The Foundation is terminated;
 - upon expiry of his/her term of office, provided that he/she has not been reappointed.
9. The DGGF Complaints Committee and the DGGF Complaints Office may draw up regulations to provide details of its working methods. Any such regulations may not be in violation of the law or this Procedure. In situations not provided for in this Procedure and any of the DGGF Complaints Office regulations, the DGGF Complaints Office may take any decisions and actions within the confines of its competence under this Procedure that it may find useful or necessary within the scope of exercising its duties.

Chapter 2 – Individual Complaints Procedure

Article 2.1 – Filing of Complaint with DGGF Complaints Office

1. The Complainant may file a Complaint with the DGGF Complaints Office.
2. The Complaint must be made in writing via the DGGF website www.dggf.nl and must at least state the Complainant's name, organization, e-mail address and a description of the (nature of the) Complaint. Confidentiality is ensured by the secretary.
3. The DGGF Complaints Office will decline jurisdiction if the Complaint involves an issue that does not fall within the scope of the DGGF Complaints Office's remit.
4. Within four weeks of receiving the Complaint, the DGGF Complaints Office will notify the Complainant in writing as to whether the Complaint will be considered. As soon as a Complaint is considered, all affected persons/parties will be informed that a Complaint has been filed by supplying the parties with a copy of the Complaint (made anonymous if requested by the Complainant).
5. The Complaints Committee Chairman will investigate all complaints eligible for consideration. The DGGF Complaints Committee and DGGF Complaints Office will be authorized to gather all such information as it may require to issue its recommendations.
6. The DGGF Complaints Committee will convene on one or more occasions, during which at least the Complainant and the affected person/parties will be heard. Otherwise, the DGGF Complaints Committee will be free to hear whomsoever it believes should be heard.
7. The Complaints Office secretary takes minutes of the hearing and of committee meetings and ensures that all Committee Members that were present during the meeting approve (in writing) of the minutes.
8. DGGF Complaints Committee meetings will take place behind closed doors. A hearing report will be drawn up of each meeting, to be signed by all attendees.
9. The secretary to the DGGF Complaints Office will ensure that the hearing reports are dispatched to the Complainant, the affected persons/parties, and the members of the DGGF Complaints Office.
10. Changes may be made to a hearing report at the request of any person heard by the DGGF Complaints Committee, provided that the changes are approved by all those present at the hearing. In the absence of such approval, the proposed change(s) will be attached as an addendum to the final report.

Article 2.2 – DGGF Complaints Office decisions

1. In all cases, a decision on the Complaint is only taken after an adversarial process.
2. If there is a justified or partly justified Complaint, the Complaints Committee Chairman of the DGGF Complaints Committee draws up corrective measures, a timeline and responsibilities in the Complaint File and draws up a letter addressed to the Complainant.
3. If there is an unjustified Complaint the Complaints Office will record the considerations and arguments as clearly and specifically as possible in the Complaint File and will draw up a letter about this addressed to the Complainant.

4. The Complaints Committee Chairman sends his intended decision regarding the Complaint to at least one of the other Complaints Committee Members for approval.
5. The Complaints Committee Chairman will in any case write in its intended decision including recommendations a reasoned opinion as to whether:
 - there is, upon initial examination, sufficient evidence to support a case as to the facts and/or circumstances described by the Complainant in the Complaint actually having occurred;
 - the Complaint is justified, partly justified or unjustified;
 - the Complaint, if justified or partly justified, calls for measures to be taken. In its written recommendations, the DGGF Complaints Office may suggest that measures be taken
6. The Complainant, the affected person(s)/party, the DGGF Complaints Committee, the DGGF Complaints Office, the Deputy PwC Team Coordinator and PwC Team Coordinator will each receive a copy of the Complaints Committee Chairman's decision.

Article 2.3 – Complainant responding to the recommendations

1. The letter describing the DGGF Complaints Committee's decision, asks the Complainant to respond within four weeks. If the Complainant is satisfied with the complaint handling, the DGGF Complaints Office closes and files the Complaint File. The DGGF Complaints Office also updates the Complaints Register.
2. If the complainant is not satisfied with the complaint handling, the DGGF Complaints Office secretary informs the Complaints Committee Chairman. The DGGF Complaints Committee takes the arguments of the Complainant into consideration and follows the steps as described under Article 2.2. The letter describing the DGGF Complaints Committee's decision after the re-assessment of the Complaint, will not ask the Complainant to respond. After the re-assessment of the Complaint and the communication of the consequential decision, the DGGF Complaints Office closes the Complaint File.

Chapter 3 – Privacy and legal protection

Article 3.1 – Privacy

3. The processing of personal information for the purposes of this Procedure will be subject to the Dutch Personal Data Protection Act (*Wet bescherming persoonsgegevens*). The Complaints Committee Chairman will be responsible for ensuring compliance with the Dutch Personal Data Protection Act for the purposes of this Procedure.
4. Moreover, any person involved in processing personal information for the purposes of this Procedure must process such information in accordance with the provisions of the Dutch Personal Data Protection Act.

Article 3.2 – Confidentiality

1. Any person who is in any way whatsoever involved in the handling of a Complaint as envisaged in this Procedure must keep all information to which he/she becomes aware of as a result of his/her involvement in this Procedure, strictly confidential. Any person called upon to make a statement about any facts or circumstances for the purposes of this Procedure will be released from his/her duty of confidentiality imposed under this Procedure. Any person conducting an investigation for the purposes of this Procedure may disclose information only if necessary to conduct such investigation and will, to that extent, be released from his/her duty of confidentiality imposed under this Procedure.
2. The above provisions do not prejudice the potential requirement to disclose the identity of a Complainant, and/or person/party to whom the Complaint relates, to the persons/agencies that are

competent to conduct further investigation or lodge legal proceedings following the processing of the Complaint or to regulatory authorities based on their jurisdiction and/or statutory disclosure requirements to the competent authorities.

3. As soon as a Complaint has been conclusively dealt with, all members of the DGGF Complaints Office will submit the data and records at their disposal during the handling of the Complaint, to the secretary of the DGGF Complaints Office. All other Complaints Committee Members are not allowed to keep any copies of files and consequently must be destroyed.
4. The secretary will be responsible for keeping the data and records on file, ensuring the confidentiality thereof and making sure that restricted access is enforced.
5. In the event of a Complaint, access to the files will be restricted to the Complaints Committee Chairman, secretary, and the Complaints Committee Members of the DGGF Complaints Committee.
6. Files will be destroyed after the statutory period of limitation for taking legal action on the matter in question has expired. Files concerning a Complaint will be destroyed under the responsibility of the Complaints Committee Chairman of the DGGF Complaints Office.

Article 3.3 – Forfeiture of rights

1. Compliance with this Procedure will not result in the Complainant exhausting any of his/her rights. The Complainant will be entitled to exercise any rights or remedies available to him/her, regardless of the outcome of the procedure involving a Complaint.

This Procedure was amended on 4 July 2016 and has been posted on www.DGGF.nl.