

Complaints and signals policy

Expat Mortgages

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1. Introduction and objective of the complaints policy

Welcome to our complaints policy, an important part of complying with laws and regulations, and also for enhancing our customers' experiences. This policy has been developed with the following objectives in mind:

Improving Customer Satisfaction: We strive to continuously improve the satisfaction of our customers. By paying careful attention to our customers' feedback and complaints, we can tailor our services to their needs and expectations.

Correct Handling of Complaints: Every complaint is an opportunity to learn and grow. We ensure that every complaint is handled correctly and efficiently, with respect for both the customer and our own processes.

Continuous Improvement of the Organization: Complaints provide insights that can help us to continuously improve. We use this valuable information to refine our processes, products, and services.

Uniformity within the Organization: This policy creates a uniform approach to complaint management within our organization, ensuring consistency and clarity for both our employees and our customers.

Compliance with Laws and Regulations: We are committed to full compliance with all applicable laws and regulations. This policy is designed to ensure that our approach to complaint management meets the highest legal standards.

With this policy, we aim to promote a culture of openness and transparency, where every complaint is seen as an opportunity to strengthen the customer relationship and improve our organization.

2. Purpose

The main goal of our complaints policy is to optimize customer retention through an effective service recovery process. We focus on creating a customer experience that not only leads to complaint resolution but also to long-term customer retention. Key factors such as speed, quality, and ensuring customers feel valued are crucial. The specific objectives are:

Customer retention: Striving for increased customer retention through effective handling of complaints.

Restoring the customer relationship: Working to restore and even improve the customer relationship after a complaint.

Performance Indicators: Use of Net Promoter Score (NPS) for service recovery, Customer Effort Score (CES), and Customer Satisfaction Score (CSAT) to assess the effectiveness of the complaints policy.

Lead time and handling time: Focus on minimizing the lead time and handling time of complaints.

Alignment with organizational goals: This policy is closely aligned with the organization's overall goals to improve customer satisfaction.

By pursuing these objectives, we ensure that every customer contact, including complaints, contributes to a positive customer experience and to the growth and improvement of our organization.

3. Definition of complaint and signal

A thorough approach to complaints and signals starts with a clear definition. In our complaints policy, we use the following definitions:

- **Definition Expat Mortgages:** We want to follow up on every signal of dissatisfaction sent to Expat Mortgages.

For the purposes of this policy, we distinguish between a complaint and a signal in the following way:

- **Complaint:** A complaint is a specifically expressed form of dissatisfaction against Expat Mortgages that requires formal follow-up. A complaint requires a systematic, traceable response and a resolution within specified timeframes.
- **Signal:** A signal is a milder form of dissatisfaction or a suggestion that does not necessarily require immediate action but can contain valuable information for improving processes and services. **Signals can indicate trends that require attention.**

4.Channels and channel control

We have the following channels available for receiving feedback at Expat Mortgages:

- www.expatsmortgages.nl/feedback
- E-mail
- Telephone (please be aware of the working hours)
- Live chat (please be aware of the working hours)

Please check category 12 for response time.

Control of channels:

- Customers can leave their feedback on the website. In case of emergency, we refer them to use the phone or live chat.

5.Registration and handling

All complaints and signals are recorded in a central registration system. This ensures that every expression of dissatisfaction is traceable and that accountability can be provided for the follow-up and resolution. The system also enables us to identify patterns, learn from feedback and improve our services.

Our complaints policy is designed to adopt a broad and inclusive approach, ensuring consistent and effective complaint handling. The scope of this policy is defined as follows:

Scope within the organization:

- The policy applies to the entire organization. This means that all departments and colleagues, regardless of their direct interaction with customers or business partners (B2B), are involved in and responsible for the implementation of this complaints policy.
- The policy is intended to ensure that complaints are handled in a uniform manner, regardless of where within the organization the signal originated.

Products and services:

The complaints policy applies to all products and services offered by the organization. **Customer segments:**

This policy applies to all customers, leads, and partner collaborations of Expat Mortgages.

By defining a clear scope, we ensure that our complaints policy is applied effectively and consistently throughout the organization.

6. Risks

Effectively managing complaints involves being aware of the various risks that can arise from not handling complaints adequately. These risks include, but are not limited to, reputational damage, legal sanctions, and loss of customers. It is essential to recognize and proactively address these risks.

Risk identification:

- Reputational damage due to negative reviews or public perception.
- Legal and regulatory sanctions for non-compliance with applicable laws.
- Loss of customers and business revenue due to dissatisfaction.

Risk mitigation:

- Development of clear guidelines and procedures for complaint handling.
- Regular training of employees in effective complaint handling and communication.
- Prompt and effective resolution of complaints to prevent escalation.

Monitoring and evaluation:

- Periodic assessment of complaint management processes to identify and address risks.
- Implementation of a dashboard or reporting system to track trends in complaints and their resolution.
- Annual review of the complaints policy to ensure it is up to date and meets current business and regulatory requirements.

Response to risks:

- Prompt action when identifying an increased risk, such as a rise in complaints about a specific issue.
- Communication with relevant stakeholders including customers, employees, and regulators, if necessary.
- Adjustment of policies and procedures based on lessons learned from risky events.

By actively managing these risks, we strengthen our organization and continuously improve our customer service and operational efficiency.

7. Legislation and regulations (incl. Regulatory Authorities)

In the context of complaints management, it is important to comply with relevant laws and regulations. This not only ensures our integrity and trust with our customers but also ensures that we operate within legal frameworks. The main regulatory authorities and governing bodies in our sector are:

- **Netherlands Authority for the Financial Markets (AFM):** Responsible for supervising the conduct of all parties in the financial markets.
- **De Nederlandsche Bank (DNB):** Plays a role in the supervision of financial institutions focusing on financial stability.

Compliance:

- Our organization strictly follows the guidelines and requirements set by these regulatory authorities.
- We regularly review our processes and policies to ensure they align with the latest regulations.

Interaction with Regulatory Authorities:

- We conduct an annual assessment and audit to ensure our compliance with regulations.
- In the case of significant complaints or issues, there is a protocol for reporting and communicating with relevant regulatory authorities.
- These interactions ensure that we are transparent in our practices and proactively respond to feedback from regulators.

By providing a solid framework to comply with relevant laws and regulations, we strengthen our complaint management and emphasize the importance of ethical and responsible business practices.

8. Basic principles for complaints and signals

In this section you will learn more about the basic principles and values. These principles are important for ensuring consistent, fair, and customer-oriented handling of feedback.

Transparency and openness:

- The complaints process is designed to be transparent and open. This means clear communication about how complaints are handled, including timelines and expectations.
- We strive to keep customers informed about the progress of their complaint and provide full visibility into our decision-making.

Learning and improvement culture:

- Complaints are viewed as opportunities to learn and improve. We encourage employees to use feedback as a tool for personal and organizational growth.
- We regularly analyze complaints and signals to identify trends and improve our processes and services.

These principles ensure the fair and consistent handling of complaints and signals that align with our values and meet customer expectations.

9. Complaints strategy and dilemmas

Our policy acknowledges that effectively handling complaints requires an approach that sometimes involves complex dilemmas. Below, we outline the core axes of our strategy and potential dilemmas:

Complaints strategy:

- We listen and we want to learn more.
- We brainstorm solutions with our clients and communicate transparently.
- We learn from clients feedback every day; we strive to improve.

Dilemma's:



10. Compensation and dealing with complaints and signals in a respectful manner

This section outlines how our organization can utilize complaints and signals to enhance our brand value and positively influence customer perception. Below are some questions to consider:

Compensation

In the context of our complaints policy, Expat Mortgages is committed to offering fair compensation tailored to each individual case. We recognize that every complaint is unique, and our policy outlines specific guidelines for assessing the nature and severity of each issue. Compensation may take various forms, including monetary reimbursement, service credits, or other benefits, depending on the circumstances. By carefully evaluating each case, we aim to provide a resolution that adequately addresses the complainant's experience and restores trust. This personalized approach ensures that all customers receive fair treatment, reinforcing our commitment to high standards of customer service and accountability.

Strengthening the brand:

- Noteworthy resolutions: Service calls following resolution of a signal/complaint for a positive concluding experience.

Influencing customer perception, the Complaint Experience:

- Sharing insights gained from feedback with customers and/or collaborative partners.
- Actively seeking feedback.
- Recording every instance of dissatisfaction.

Communication strategy:

- We are transparent in communication
- We keep feedback submitters informed of the progress of their complaint

Managing complaints is not just an operational necessity, but also a strategic approach to enhancing the brand and fostering deeper customer relationships.

Complaints = Marketing!

11. Precedent effect

In our complaints policy we recognize the importance of learning from past complaints and using these experiences as guidelines for future situations. This ensures consistency and fairness in our handling of complaints and helps us to continuously improve.

Learning from past complaints:

- We analyze resolved complaints to identify patterns and learning opportunities. This information is used to enhance our processes and approaches, potentially enabling us to proactively address complaints.
- Decisions taken in past complaints are recorded and can serve as a reference for similar future cases.

Consistency in handling:

- When addressing new complaints, we refer to our history of complaint handling to ensure consistency. This means treating similar complaints in a comparable manner, unless specific circumstances justify a different approach.
- Complaint handlers receive regular training on the principles of precedent effect and how to apply them.

Documentation and communication:

- All complaints and decisions taken are carefully documented in an online system. This promotes transparency and accessibility of information for the entire team.
- Important decisions and changes in complaint handling approaches are communicated within the organization to ensure everyone is informed of the latest standards and practices.

This precedent setting approach ensures that our complaint handling is not only fair and consistent but also continually evolves and improves based on lessons learned.

12. Complaint handling (Service Level Agreement)

To ensure that complaints are handled efficiently and effectively, we apply guidelines as laid down in our Service Level Agreement (SLA). This SLA determines the standards for response times, the handling process, communication and follow-up of the complaint.

Response times:

- After receiving a complaint, we strive to give an initial response within 24 hours (please be aware that the weekend may affect this deadline). This means one of our Team Leads will get in touch with you to get more details about the complaint, to be able to build an internal case and informing you of the next steps.
- The ultimate solution or handling of the complaint aims to be completed within 5 working days, depending on the complexity of the complaint.
- Please note: Financial Services Complaints Institute (Kifid) recommends that the complaint must be handled within 6 to 8 weeks. Expat Mortgages respects this deadline.

The service recovery process:

- The service recovery process involves several steps, from receipt, assessment and investigation to the final resolution and feedback to the customer.
- Throughout the entire process, the customer is kept informed of progress and any delays.

Communication with customers:

- Customers are regularly informed about the status of their complaint via their chosen communication channel (email, telephone, etc.).
- Upon receipt of the complaint, an acknowledgment is sent within 48 hours, outlining the following information:
 - o Date of receipt of the complaint
 - o Brief description of the complaint
 - o Process steps
 - o Expected term of treatment and solution (in any case within 6 weeks)
 - o Contact person
- The customer is informed of every significant step or decision

Follow Up:

- After the complaint is resolved, a message is sent to the customer detailing the solution and position, including any further steps towards the Financial Services Complaints Institute (Kifid) if applicable.
- Customers are invited to provide feedback on the handling process, which helps continuously improve our approach.
- The SLA ensures standardized, fair, and timely handling of all complaints contributing to better customer satisfaction and retention.

13. Learning from complaints and feedback

This section of the policy emphasizes the importance of learning from complaints and feedback, not just as a way to solve immediate issues but also as an opportunity to continuously improve our services and processes. Maximizing the potential of complaints!

Feedback analysis:

- Complaints and feedback are regularly analyzed to identify trends, common issues, and opportunities for improvement. This analysis can occur monthly or quarterly, depending on the volume and complexity of the feedback received.
- This analysis helps us gain deeper insights into the needs and expectations of our customers.

Implementation of improvements:

- The insights gained from complaints and feedback are translated into concrete actions. This can range from small process adjustments to larger policy changes. The foundation for learning from complaints is the A3 methodology, which focuses on identifying and addressing the root causes by implementing the right measures—Plan Do Check Act.
- Responsibilities for implementing these improvements are clearly assigned to ensure that actions are carried out effectively. Follow-up on these improvements will take place monthly with the innovators.

Close the loop! Feedback loops:

- **Large Learning Loop:** This loop is focused on the organization. The lessons learned are shared with relevant departments and teams to improve processes and prevent future complaints.
- **Small Feedback Loop:** This loop is focused on the customer. Customers are informed about the actions taken and improvements made as a result of their feedback. This ensures transparency and demonstrates our commitment to customer satisfaction.

Employee involvement:

- Employees are encouraged to actively participate in learning from complaints and feedback. This can be through providing input for improvements and participating in trainings and workshops that arise from the lessons learned.
- By adopting this approach, we create a culture where continuous learning and improvement are central, ultimately leading to higher customer satisfaction and improved operational efficiency.

14. Measuring = knowing!

In our complaints policy, measuring various aspects of complaint management is essential to ensure continuous improvement and compliance with regulations. This includes recording complaints, measuring and assessing the effectiveness of our service recovery, and analyzing the causes of complaints to learn from them.

Registration:

- All complaints and signals are registered in our system. This registration is important for compliance, tracking processing and analyzing trends over time.

Measuring Service Recovery:

- We use a survey after the feedback process. These measurements provide insights into how customers perceive our response to their complaints and whether they are likely to recommend us.

Performance of the Service Recovery Process:

- In addition to customer-oriented measurements, we also assess the internal quality of our complaint handling. This includes matters like response speed, solution quality, language use and consistency in handling complaints.

Learning from complaints, analyzing causes:

- Regular analysis of the causes behind complaints helps us identify and address structural issues.
- These analyses can lead to improvements in our products, services, or processes, helping us prevent future complaints.

By adopting this approach, we ensure that complaint handling is not only reactive but also proactive and focused on continuous improvement—creating a win-win situation.

15. Dashboard of reporting

The dashboard is a tool in the complaints policy that not only provides data and analysis but also includes space for the story behind the numbers. It combines quantitative measurements with qualitative insights, such as complaint stories, to provide a more complete picture of customer experience and performance.

Functions of the Complaints Dashboard or Reporting

- The dashboard or report shows information such as the number of signals, response time, compensations and more.
- Storytelling element: In addition to these figures, the dashboard also includes signals that help give context and meaning to the data. This can take the form of case studies or summaries of specific complaints.

Accessibility and use:

- The registration form is accessible to everyone within our company (hosted on our Intranet).

Maintenance:

- The responsibility for maintaining and maintaining the dashboard/report lies with the process owner

Action based on dashboard data:

- Insights from the dashboard are used to proactively make improvements to the complaint and signaling process.
- This approach helps us to respond quickly to trends and to continuously improve our services.

16. Review and feedback policy

Our organization's review policy is aimed at protecting our customers and ensuring transparency and honesty in our online presence. This policy includes the following key aspects:

Requesting feedback:

- The moments in which we request feedback, such as sending direct links to surveys:
 - After the first meeting with an advisor
 - After notary completion
 - Or on a specific project
- We do this by phone or email.

Requesting reviews:

For transparency purposes, we request reviews from our clients at the end of the process via Google Reviews. However, Google allows clients to submit reviews at any given moment.

Calculating average score:

- Google Reviews calculates the score based on 5 stars rating. Clients can submit the number of stars they want to give and also write a short text if they wish to do that.

Handling negative and inappropriate reviews:

- We respond to negative reviews with transparency and honesty, ideally as quickly as possible, aiming to get in touch with the review writer. We try to pick up personal contact via phone or email.

Authenticity of reviews:

- We always try to verify the sender of the review. However, because of the third-party provider (Google) we are not always able to verify that.
- When a fake review is detected, we always react to it in writing and ask Google to remove it.

Transparency in reviews:

- We don't offer our clients anything in exchange for their reviews. The only way they can benefit from it, is to use the written review and to become a member of our Ambassadors programme.

This policy ensures that customers are not misled and that all relevant information is available when considering purchasing our products or services.

17. Intimidation and aggression policy

This section provides clear guidelines for dealing with situations of intimidation and aggression, whether directed at or coming from customers. Unfortunately, we encounter these situations in complaint handling. The goal is to ensure a safe and respectful environment for everyone.

Definition of intimidation and aggression:

- Intimidation and aggression include all forms of threatening behavior, from verbal aggression and personal insults to physical threats.
- The policy recognizes that such behavior is not acceptable and that appropriate action will be taken in the event of such incidents
- Reporting to the police is considered in the event of intimidation and threats

Response Guidelines:

- Employees have clear instructions on how to respond to intimidation or aggression. This includes maintaining composure, not responding to provocations, asking de-escalating questions and thus escalating the situation to a manager or security.
- The ABC model has been discussed
 - Cause
 - Behaviour
 - Consequence
 - Intervention
 - Succession
- The importance of documenting the incident for future reference is emphasized.

Support and training:

- The organization offers training and support for employees on how to deal with aggressive or intimidating situations.
- There are clear protocols for employees dealing with such situations.
- Training for Expat Mortgages employees took place in January 2024

Escalation procedures:

- For severe incidents, there are clear escalation procedures, including involving security personnel and, if necessary, the police.
- The procedures also include guidelines on when and how incidents should be reported to higher management.

Prevention and awareness:

- The organization takes proactive steps to prevent harassment and aggression, including promoting a culture of respect and understanding.
- Increasing awareness through training to inform colleagues about the importance of a safe and pleasant working environment.

18. Complaints procedure and process

Our approach to complaint management combines a structured procedure with a clear process (the Complaint Journey) to ensure that every complaint is handled carefully and with attention. The process in broad terms:



Submitting a complaint:

- Customers can submit complaints through various channels such as email, phone, or an online form. When submitting, specific details of the complaint should be provided, along with the customer's desired resolution.

Confirmation of receipt:

- Every submitted complaint is acknowledged, informing the customer of the next steps and expected timelines.

Assessment and investigation:

- Complaints are first assessed to determine their nature and urgency, followed by a thorough investigation conducted by employees specifically responsible for this phase.

Communication during the service recovery process:

- During the entire process, regular communication is maintained with the customer about the status of their complaint and any progress. Please note that AFM has a reasonable period of 6 weeks for handling the complaint

Resolution and completion:

- Once a complaint is resolved, the customer is informed of the outcome, preferably in a personal conversation. The resolution includes a clear explanation/position on the decisions and actions taken. Additionally, information about the appeals process (if applicable) is provided, along with the option to submit the complaint to the Financial Services Complaints Institute (Kifid) or pursue Civil Court action if the customer is not satisfied.
- Confirm the completion of the complaint handling with a written confirmation.
- **Feedback and improvement:**
- After closing the complaint, feedback from the customer is collected to improve complaint handling and service delivery, ensuring the win-win of complaint management benefits for both the customer and the organization.

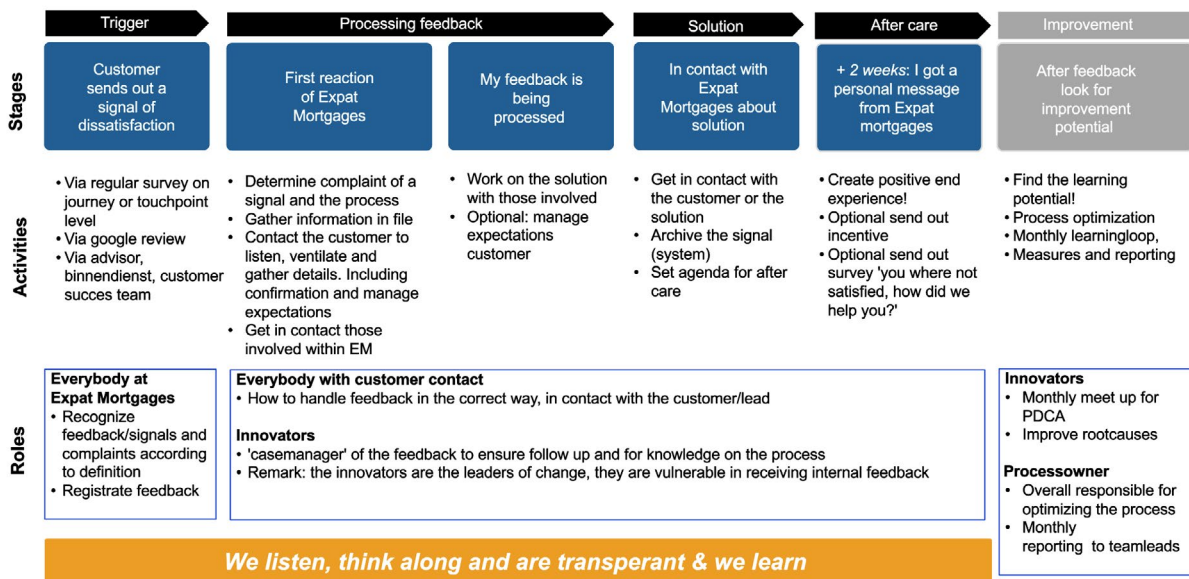
Note: Use of professional liability insurance

- If the complaint could lead to a liability claim, it is recommended to contact the business liability insurance company; further communication will take place in consultation via the insurer. SAA Insurances, policy number 643756509, contact: schade@hereninvest.nl/023-5112255.

By approaching the complaints procedure and process in this way, we ensure efficient, transparent and customer-focused handling of all complaints. Working smart and successfully with complaints.

19. Tasks, roles and responsibilities

This section of the complaints policy is designed to help organizations specify responsibilities and roles within the complaints management process. This ensures clarity in terms of mandate.



By defining these tasks, roles and responsibilities and adapting them to the specific context of the organization, the complaints policy not only becomes more effective, but also more tailored to the unique needs and structure of the organization.

20. Compliance and privacy policy:

[Privacy policy - Expat Mortgages](#)

Retention period:

- The retention period for a complaint in the financial services sector is typically 5-7 years after the complaint is resolved (note that there may be different retention periods for specific complaints within the industry).

In general these are (check this for your organization from the regulator AFM, code of conduct, SKGZ, etc.)

- o Date of receipt and resolution of the complaint
- o Customer information, contact details
- o Information about the complaint, cause, follow-up, and resolution
- o Communication and case file information