



## Klachten beleid

### **IQ-EQ Giro Services**

(Voorheen SGG-Giro Services)

## **IQ EQ -Giro: Klachten beleid**

De Stichting Beleggingsonderneming IQ EQ -Giro (IQ EQ -Giro) is een onder AFM-toezicht staande beleggingsonderneming die zich toelegt op het ontvangen van orders van andere beleggingsondernemingen (Opdrachtgevers) en / of cliënten van Opdrachtgevers (Cliënten) en deze doorgeeft.

IQ EQ -Giro is onderdeel van de IQ EQ Group. Een wereldwijde dienstverlener in de investor services industrie. Als onderdeel van IQ EQ Group heeft IQ EQ -Giro de klachtenprocedure overgenomen zoals deze door Nederland is gedefinieerd. Deze procedure (in het engels) is opgenomen als bijlage van dit document.

IQ EQ -Giro heeft zich aangesloten bij het Klachten Instituut Financiële Dienstverlening (Kifid). Indien een Cliënt de onderbouwing van IQ EQ -Giro inzake een klacht niet volledig accepteert, of in twijfel trekt, dan kan de casus door de Cliënt worden voorgelegd aan het Kifid.

Het postadres van Kifid luidt:

Kifid  
Postbus 93257  
2509 AG Den Haag

# BIJLAGE



## Clients complaints handling procedure

## 1. Purpose and scope

IQ EQ Netherlands N.V. ( IQ EQ NL) aims to provide a high standard of services to its clients. However, from time to time, errors can be made which may give rise to a complaint. If this is the case, IQ EQ NL is committed to handle it in accordance with the outlined guidelines.

## 2. Regulatory background

There is no regulatory background for this procedure.

## 3. Resources

IQ EQ NL employees with frequent client contact could receive a complaint. Furthermore a client could contact IQ EQ NL via a dedicated email address to express a complaint. This email address is redirected to Internal Audit.

## 4. Management information

Client complaints register.

## 5. Activities

IQ EQ NL ensures that a thorough and impartial investigation is carried out within a reasonable time frame after receipt of a complaint.

- Internal Audit will determine whether a complaint is to be registered as a complaint according to the following parameters:
  - o The complaint is coming from a stakeholder;
  - o The complaint was reported in writing by mail or email;
  - o The complaint must be blamed on IQ EQ or an IQ EQ contracted party.
- IQ EQ NL will provide a written acknowledgement within 10 business days after receipt of the complaint.
- At least, one month after receipt of the complaint, IQ EQ NL, will send a response. The response will bear the name and the function of the person handling the complaint, including:
  - o A final response to the complainer; or
  - o A response where IQ EQ NL, will inform the complainer of the causes of a delay and an indication of a date at which the examination of the complaint is likely to be achieved.

Complaints can be send (in Dutch or English) by writing directly to the client contact person, whether by post or fax or by email to **ComplaintNL@iqeq.com**.

## 6. Handling a complaint

No.	Step	Responsible	Description
1	Receive a complaint	Internal Auditor	Internal Audit receives a complaint from a client or a third party involved with a client.
2	Determination of complaint	Internal Auditor	The Internal Auditor determines whether the complaint is to be registered in the Client complaint register or not.
3	Forward complaint to Client Director and Client file Owner	Internal Auditor	Forward registered or non registered "complaint" by Internal Auditor to the related Client Director and Client file Owner.
4	Internal Auditor informs Management	Internal Auditor	Internal Auditor informs Management and if applicable Compliance and Legal Counsel.
5	Register the complaint in the Compliant register	Internal Auditor	Internal Auditor will file the complaint in the Client complaint register and will follow up with CD/CfO for status.
6	Contact complainant to investigate and to confirm receipt of complaint	CD and/or CfO	Client Director and/or Client file Owner contacts complainant confirming the receipt of the complaint and to confirm investigation.
	Fill out Client complaint register form		
7	Monitoring of complaint	CD	Client Director is responsible for the follow up and finalization of the complaint.

## 7. RACI

Process	Function				
	Internal Auditor	Client Director	Client file Owner	Compliance	Legal Counsel
Receiving complaint	R/A				
Communication complainer		R/A	R	I	I
Registration of the complaint	R/A	I	I		
Handling complaint		R/A		I/C	I/C

Legend:

R (Responsible,	Those who do the work to achieve the task.
A (Accountable)	The one ultimately answerable for the correct and thorough completion of the deliverable or task, and the one who delegates the work to those responsible. In other words, an accountable must sign off (approve) work that responsible provides. There must be only <u>one</u> accountable specified for each task or deliverable.
C (Consulted)	Those whose opinions are sought, typically subject matter experts; and with whom there is two-way communication
I (Informed)	Those who are kept up-to-date on progress, often only on completion of the task or deliverable; and with whom there is just one-way communication

## 8. Documents

Client complaints register form is to be filled out and signed by the Client Director.

## 9. IT Systems

Description of systems involved	
P drive	Filing of the Client complaints handling form

## 10. Relations with other processes

Incident procedure.