

Customer Complaints Policy

Robeco Institutional Asset Management B.V.

Document information

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*This policy is translated from Dutch, In case of inconsistencies the Dutch version shall prevail

Customer Complaints Policy Robeco

1. Introduction

This policy is based on the Treating Clients Fairly Standard of Robeco and the relevant regulation¹.

1.1 Objective

Objective of this policy is to set rules for uniform, properly and verifiable handling of client complaints.

1.2 Scope

The Customer Complaints Policy applies to Robeco Institutional Asset Management B.V., including its subsidiaries, branches and representative offices ('Robeco'). For the provision of services to retail clients this policy is implemented in the retail complaint procedure.

1.3 Definitions

Complaint

A written expression of dissatisfaction submitted by a client about a service and/or product provided by Robeco in which Robeco is accused of having acted in conflict with the contract and/or laws and regulations.

Compliance

The Compliance department of RIAM.

RIAM

Robeco Institutional Asset Management B.V.

1.4 Rules for complaints handling

1. Every Complaint of a Robeco client will be reported to the head of the responsible sales team².
2. The head of the responsible sales team informs immediately the head of Client Services. The head of Client Services shall, as responsible complaint manager, process and monitor follow up on the Complaint. The head of Client Services shall inform Legal Affairs and Compliance of the receipt of a Complaint. Operational Risk Management shall be involved if a Complaint qualifies as an incident under the Incident Management Policy.
3. Within two weeks after receipt of the Complaint, Client Services sends a confirmation of the receipt of the Complaint to the client.
4. A Complaint will be handled within eight weeks of receipt unless this is not possible due to special circumstances. Meanwhile Client Services will keep the client informed.
5. Client Services registers every Complaint, including relevant documentation, in the CRM system. The Complaint file will be kept at least one year after the Complaint is settled.
6. The following data on the Complaint will be registered in the CRM system:
 - a. Name and address of complainant;

¹ Wft art 4.17; Bgfo §7.1

² In a branch, representative office complaints can be handled by different (named) departments.

- b. Date of receipt of the Complaint;
 - c. Description of the Complaint;
 - d. Possible financial damage;
 - e. Resolution of issue;
 - f. Response given to the client.
7. The head of Client Services reports back to the head of the responsible sales team on how the Complaint was settled. On a quarterly base the head of client services reports a summary of Complaints received and the follow up on the Complaints to RIAM Executive Committee.
8. If the Complaint will be rejected partially or fully, the client will be informed that, if applicable, he or she may submit the Complaint to a recognized dispute-settlement body or take the dispute to a civil court. The information to the client shall mention the relevant timelines used by the dispute settlement body.