

Complaints Handling Policy

1. Introduction

For Triodos Bank Group (Triodos), having good and transparent relationships with its stakeholders is very important. The bank therefore attaches great value to being well informed on possible sources of Complaints, and to get in contact with any dissatisfied person so that suitable solutions can be found, and products, activities and services can be improved. This is in line with the Triodos Business Principles, stating that Triodos welcomes feedback and comments of its customers and handles potential expressions of dissatisfaction fairly, consistently and promptly.

This policy describes the measures that Triodos takes to ensure that an effective and transparent policy and related procedures for the prompt handling of Complaints are in place. It provides clear, accurate and up-to-date guidelines in respect of the Complaints handling process.

2. Scope

This policy applies to all activities, products and services of Triodos, except for (the activities and services of) Triodos Regenerative Money Centre, Triodos Investment Management and the Triodos Investment funds who, due to the specific regulatory requirements applicable to them, must have in place their own Complaints handling policy and procedures.

This policy sets out the types of measures that should at least be taken by all Operating Units within its scope. It is based on several European regulations and directives in force related to banking and investment activities, such as the Directive on markets in financial instruments II (MiFID-II); Joint Committee Guidelines for complaint handling for the securities (ESMA) and banking (EBA) sector; Regulation on online dispute resolution for consumer disputes and the Directive on alternative dispute resolution for consumer disputes, as well as Dutch law.

Local law or best practices may differ or give additional rules and regulations in respect of this subject. It is the responsibility of local management to determine what law or practices are applicable to their operations.

3. Definitions

Definitions and abbreviations used in this document are written with a capital letter and, when they are not explained in this document can be found, and have the meaning as set out in the Triodos Taxonomy.

Abbreviations	Meaning
DGS	Depositgarantiestelsel (Dutch Deposit Guarantee Scheme)
Definitions	
Complaint	Any statement of dissatisfaction explicitly addressed to Triodos by a natural or legal person relating to the provision of an investment service, a banking service or the actions of Triodos Bank. Note: any feedback showing some dissatisfaction can be considered as a Complaint. In case of doubt, the feedback should be treated as a Complaint. Dissatisfaction can be expressed through various channels. Expressions of dissatisfaction via Facebook, Twitter, Instagram, WhatsApp, telephone, e-mail, an advisor or by letter received by Triodos can be considered as a Complaint, provided that the statement was made via an official channel of Triodos, where it also (re)actively communicates with individuals, for example via a response to the official Facebook page.
Complainant	Natural or legal person who is presumed to be eligible to have a Complaint and who has already lodged a Complaint.

4. Measures

In order to ensure that effective and transparent Complaints management processes and procedures are in place for the prompt handling of Complaints, the measures set out below must be taken by all Operating Units. Please note that these measures are mandatory but may be implemented in separate manuals and procedures and may also be incorporated in documents that address other topics.

I Organisation

i) Complaints management function

A Complaints management function responsible for the investigation of Complaints is in place, both at central and local level, which enables Complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated. This function may be combined with-, or carried out by, another function. On group level (TBHO) this function is carried out by the Group Director Retail Banking and Group Director Business Banking in joint cooperation.

ii) General principles for Complaints handling within Triodos

- a) each Operating Unit must have one central, clearly communicated and easily accessible point of contact where Complaints can be filed;
- b) each Complaints handling procedure must at least:
 - give clarity on response times; in principle the response time for reaching a decision should be 6 weeks at the maximum, and
 - include the possibility of internal appeal
- c) Complaints must be carefully recorded and reported (see also below under iii) and v)) and the collected data must be carefully analysed in order to recognize any important patterns and take action where necessary (see also under iv).

iii) Register

Each Operating Unit keeps an adequate internal administration that registers each Complaint received in an appropriate way. The register must at least clearly indicate the following:

- a) If a Complaint relates to a product, the Product Group and Product Category must be registered in line with the Product Offering List.
- b) If a Complaint relates to a financial instrument, this must be registered because those Complaints have to be reported to the non-prudential regulator on a regular basis (see under v) below).
- c) If a Complaint relates to Triodos Bank Depository Receipts or other capital product, this must be registered.
- d) If a Complaint relates to DGS and data quality, this must be registered.

iv) Internal follow-up of Complaints-handling

Both on group and local level Complaints handling data are analysed on an ongoing basis, to ensure that any recurring or systemic problems are identified and addressed, as well as any potential legal and operational risks. This is done, among others by:

- a) analysing the causes of individual Complaints to identify root causes common to types of Complaint;
- b) considering whether such root causes may also affect other processes or products, including those not directly complained of; and
- c) correcting, where reasonable to do so, such root causes.

v) Reporting

Internal:

Twice a year a report on the Complaints received must be provided to the Group Director Retail Banking and Group Director Business Banking.

External:

Information on Complaints and Complaints handling in respect of financial instruments offered-, and investment services¹ provided by Triodos must be reported to the non-prudential regulator once a year. This also includes information on Complaints in respect of ancillary services, as defined in MiFID-II², provided by Triodos. The report consists of the total number of Complaints received with regard to financial instruments in the reporting period, as well as the total number of these Complaints that have been settled during the reporting period. The report includes Complaints received by all Operating Units.

vi) Role of Compliance Department

The Compliance Officer is responsible for second line monitoring the operations of the Complaints handling process and must consider Complaints as a source of relevant information in the context of his/her general monitoring responsibilities. For that purpose, and in particular where a Complaint relates to financial instruments and investment services, they shall carefully analyse the Complaints and Complaints handling data to ensure that any risks or issues are identified and addressed.

¹ This refers to services like: receipt and transmission of orders in financial instruments (like Triodos investment funds or depository receipts), investment advice, portfolio management

² Such as: corporate finance advice, custody of financial instruments

II Procedures

i) Receiving of / responding to Complaints

- a) Complaints may be submitted free of charge.
- b) Upon receipt of a Complaint, each Operating Unit shall
 - seek to gather and investigate all relevant evidence and information regarding the Complaint
 - communicate with Complainants clearly, in plain language that is easy to understand
 - provide a response without any unnecessary delay; the response time should in principle not exceed 6 weeks
 - the Complainant shall be provided with a separate confirmation of receipt of the Complaint, unless the answer to the Complaint can already be provided within a week
 - When an answer cannot be provided within the expected time frame of 6 weeks, the Operating Unit should inform the Complainant about the causes of the delay and indicate when it's investigation is likely to be completed
 - when communicating Triodos' position on the Complaint to Complainants, it must always include a thorough explanation of this position. It must also provide information on Complainant's options to maintain the Complaint, such as
 - in first instance – the possibility of the internal appeal procedure; the availability of alternative dispute resolution entities, or that the Complainant may take civil action.

ii) Provision of information

- a) Details of the procedure to be followed when handling a Complaint are made public by each Operating Unit in an easily accessible manner, for example in brochures, contractual documents or via the website. Such details shall include information about the Complaints handling policy and the contact details of the Complaints management function.
- b) This information shall also be provided to stakeholders on request, or when acknowledging a Complaint.
- c) The information about the Complaints handling process must be clear, accurate and up-to-date, and include:
 - further details on how to complain (e.g. the type of information to be provided by the Complainant, the identity and contact details of the person or department to whom the Complaint should be directed);
 - the process that will be followed when handling a Complaint, e.g. when the Complaint will be acknowledged, indicative handling timelines, the availability of the internal appeal procedure and of a competent authority or alternative dispute resolution entities (see under d) below), etc.

- d) (Potential) stakeholders must be informed about the available alternative dispute resolution entities:
 - the Online Dispute Resolution Platform (ODR Platform) of the European Commission by providing a link on the local websites. In addition, those Operating Units that are committed or obliged (by local law) to use one or more alternative dispute resolution entities to resolve disputes with (potential) customers, shall not only provide an electronic link to the ODR platform on their websites but if offers are made by e-mail they shall also provide information on the ODR platform in that e-mail. Such information shall also be provided, where applicable, in the general terms and conditions applicable to online sales and service contracts.
 - any national alternative dispute resolution entities used by the Operating Unit
- e) The Complainant shall be kept informed about further handling of the Complaint.

5. Responsibilities at local level

Local managers are responsible for implementing this policy within their respective Operating Unit. Each Operating Unit shall at least:

- set up, publish and maintain a local Complaints handling procedure
- ensure that the Complaints handling procedure is available to all relevant co-workers through an adequate internal channel
- keep an inventory of local Complaints received, also see Chapter 4.I.iii) and v) Any Complaint received must be registered and documented. This documentation must also show what measures have been taken to solve the Complaint
- send regular reports to the Group Director Retail Banking and Group Director Business Banking.

6. Responsibilities at central level

At group level, the Group Director Retail Banking and Group Director Business banking are responsible for:

- setting up and maintaining a Complaints Handling policy
- communicating this policy to all relevant co-workers, locally and centrally, through an adequate internal channel
- handling Complaints related to Head Office functions and activities, and monitoring local Complaints handling
- organising and coordinating (by Director Retail Banking) external reporting to the non-prudential regulator.

7. Key controls

Both at local and central level, the following must be in place:

- a co-worker has been appointed as Complaints handling coordinator
- a local procedure on how Complaints are handled in detail within the Operating Unit, in line with the principles set out in this policy, is available and clearly communicated
- a local Complaints register in line with the requirements as set out in this policy
- a reporting structure in respect of Complaints:
 - i) Internally, to Director Retail Banking and Director Business Banking
 - ii) Externally, to
- local regulator (if necessary)
- Non-prudential regulator, to be organised and coordinated by the Director Retail Banking

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