



Complaints procedure

We make every effort to provide you, our client, contractor/customer or interested party who is using our services, with the best possible care. However, you may nevertheless meet with an issue in our services. We appreciate it if you express your dissatisfaction to us, so that we can help rectify the cause of your dissatisfaction. In order to provide a better understanding of the complaints-handling process, we have set up a complaints procedure. The process of handling complaints is explained item by item below.

Scope of application

This complaints procedure applies to Active Health Group, trade name of Capabel Solutions Works B.V. and its operating companies:

- Active IT Lab B.V.
- Atrium Adviesgroep B.V.
- CS Works Re-integratie & Outplacement B.V.
- CS Works Verzuimmanagement B.V.

Terms

General definitions:

- Client: the individual provided to Active Health Group for supervision or who is being supervised by Active Health Group, hereinafter referred to as the Client,
- Contact person: an Active Health Group employee who is the coordinator between the complainant and the complaint handler,
- Complaint handler: the Active Health Group employee responsible for handling the complaint,
- Complaints procedure: this procedure for handling complaints, which can be referred to as 'Active Health Group Complaints Procedure',
- Complainant: may be a client, employer, contractor or interested party of the services,
- Client: party who places orders with Active Health Group concerning Absenteeism Supervision, Organisation Consultancy/DZI Consultancy (sustainable employability)/Integral Health Management, Medical examinations, Preventive Medical Examination (PMO)/PAGO (Periodical Occupational Health Test), Preventive Medical Examination 2.0 (PMO 2.0), Employability/Resilience/Lifestyle Coaching, Reintegration coaching, Career Coaching/Outplacement, Courses/Training/Education, hereinafter referred to as the Client,
- Interested party: the party who has an interest in the service and who is not a client or contractor
- Employer of the client, hereinafter referred to as the Employer.

Right of complaint

Everybody has the right to file a complaint about the conduct of Active Health Group, companies or other organisations, which have acted on behalf of Active Health Group, in respect of him or another person in the performance of the tasks agreed upon in the agreement with the client, and to have the complaint handled in the manner indicated in this procedure.

Purposes

The purposes of this complaints procedure are:

- Accurate registration and handling of complaints,
- Eliminating causes,
- Taking appropriate measures to prevent recurrence.

Definition of a complaint

A complaint is any formal expression of dissatisfaction with the actions of Active Health Group or one of its employees or third parties who have performed work for us on our behalf.

Complaints of a general nature relate to the entire organisation; these complaints cannot be directly traced back to an action of an employee. A complaint often arises if the complainant is disappointed in his expectations of behaviour and this is expressed in dissatisfaction. Usually, we can resolve a complaint immediately. This complaints procedure is aimed at complaints that have been submitted in writing in accordance with the method described under 'Filing a complaint'.

Filing a complaint

A complaint must be submitted in writing, by e-mail or letter, and addressed to the management of Active Health Group. If desired, an Active Health Group employee will help you with the wording of your complaint. A notice of complaint must be legibly written in the Dutch language, signed by the complainant and must include the following:

- the name, address and contact details of the complainant,
- the date,
- a description of the conduct which is the subject of the complaint.

Allocation of responsibility

Complaints are handled under the responsibility of the management and the board of directors of Active Health Group. The latter may use the advice of other employees, or employees and experts acting on behalf of Active Health Group.

Administrative registration

The recipient of the complaint at Active Health Group ensures registration of the complaint in Active Health Group's complaints register. The complainant will be informed by Active Health Group of the receipt of the complaint within 10 working days. The following items must also be included in the register:

1. Concise description of the complaint,
2. The period in which the handling of the complaint is expected to be completed,
3. The contact person whom the complainant can turn to if he so wishes,
4. The name of the complaint handler.

Hearing the complainant and the person who is the subject of the complaint

The follow-up process:

1. If a complaint is directed against the conduct of an Active Health Group employee, the complaint will never be handled by this employee. The complaint handler is always a manager or board member and in any case someone from Active Health Group, who is sufficiently disassociated from what happened. The

complaint handler will make an objective assessment and will at all times hear both sides again. The employee in question will immediately be personally informed of the complaint.

2. A hearing will be organised in two situations: (a) if the complainant so wishes. If the complainant is an employee, this must be requested in writing. Or (b) if, in the opinion of the responsible manager or management, the complaint requires further explanation by the complainant. The management will give the complainant and the person to whose conduct the complaint relates the opportunity to be heard. The place and time of the hearing will be determined by the management.
3. Both the complainant and the person to whose conduct the complaint relates have the right to inspect all relevant documents relating to the complaint. Exceptions are documents subject to medical secrecy and confidential documents relating to employees. The location and time of the documents available for inspection will be determined by the management. Upon request, both the complainant and the person to whose conduct the complaint is related can obtain copies of these documents free of charge.
4. The complainant and the person whose conduct is being complained about may bring witnesses and experts at their own expense.
5. A report is made of the hearing, which is sent by the management to the complainant and to the person to whose conduct the complaint is related.

Handling

Complaint handling:

1. The decision on the complaint will be communicated in writing to the complainant and - if applicable - the Active Health Group employee who is the subject of the complaint. If the complaint has been resolved promptly and to the satisfaction of the complainant, a note of the contents of the complaint in the file by the Active Health Group employee handling the complaint will suffice.
2. The decision on the complaint contains:
 - A representation of the complaint,
 - A representation of the facts regarded by Active Health Group,
 - A reasoned point of view with regard to the complaint,
 - An assessment of the complaint.
3. The assessment implies that the complaint is found to be valid or not valid or that the complaint is not being dealt with.
4. If a complaint is declared valid, the complaint handler will, if a full or partial remedy of the complaint is possible, take action and evaluate the handling of this action. The agreement between the complaint handler and the complainant about the measure(s) to be taken will be recorded in writing.
5. The assessment that the complaint will not be dealt may be given in the event that:
 - a) It is unequivocally established that not Active Health Group - or an organisation or a person working under the responsibility of Active Health Group - yet a third party is the subject of the complaint,
 - b) The complaint relates to conduct that has already been dealt with in accordance with an Active Health Group complaints procedure,
 - c) The complaint relates to conduct that took place more than one year before the complaint was lodged,
 - d) The complaint concerns conduct which, by instituting proceedings, is or has been subject to the judgment of a court other than an administrative court,
 - e) The conduct forms part of the investigation or prosecution of an offence and is the subject of an investigation ordered by the public prosecutor or a prosecution in progress,
 - f) The complaint does not contain the elements referred to in the article 'Filing a complaint', whereby the complainant has had a reasonable period of time to supplement the notice of complaint,

6. If the complainant is not satisfied with the handling of the complaint, an appeal can be lodged with the Working Conditions Disputes Committee for Health and Safety Services via <https://ga.klachtregeling.nl/>.

Time-limits

A deadline of 6 weeks after the complainant has been notified of receipt of the complaint is set for responding to a complaint to be handled. If the response to the complaint cannot be completed within the period of 6 weeks or less stated in the acknowledgement of receipt, the complainant will be notified in writing, stating the reason for the postponement. The letter of postponement will state a new period of handling which is chosen in a way that the total handling time does not exceed ten weeks.

N.B. Only one postponement can be given. A decision not to deal with a complaint (see item 5 under 'Handling') must always be communicated in writing to the complainant within 4 weeks. No further postponement is therefore possible for taking a decision.

Accountability information

The complaints and the outcome of the handling are registered within Active Health Group in accordance with the General Data Processing Regulation. The management of Active Health Group keeps a record of submitted complaints reports. This helps to gain an insight into the nature of the complaints, the performance of its employees and any preventive measures can be taken. This can provide an important incentive for quality improvement.

Retention periods

We will not keep your data longer than necessary. Please refer to our privacy regulations for the retention periods of complaints and their handling. Our privacy regulations can be found on our website.

Amendments to this complaints procedure

We reserve the right to amend this complaints procedure. All changes will be announced on our website. We therefore advise you to consult our website regularly so you are aware of any changes.

The original document was written in the Dutch language and translated into the English language. While it is intended that both versions are identical, in the event that there are any discrepancies between the Dutch language version and the English language version, the Dutch language version will control.

Our contact details

For all your questions and comments about these complaints regulations, please contact your regular contact person or contact us on our general telephone number or e-mail address listed below:

Active Health Group
Folkert Elsingastraat 38
3067 NW Rotterdam
T: +31-88-2866055
E: info@activehealthgroup.nl

Document version: January 2020