



SNPS Complaints policy

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Introduction

The mission of Shell Nederland Pensioenfonds Stichting (SNPS) is 'to enable participants to make informed decisions about income for the future'. To fulfil this ambition, SNPS is committed to careful and accurate pension administration, timely and correct payment of pensions and providing proper services to stakeholders¹. Despite these efforts, it is possible that a stakeholder may not be (entirely) satisfied with the conduct of the pension fund. This may concern the administration of the pension scheme (such as an individual matter about a pension entitlement or the amount of the benefit), but also, for example, the way a stakeholder feels they have been treated. In this situation, it is important for the stakeholder to be able to file the complaint easily and at no cost, and for the complaint to also be processed at no cost. This allows the stakeholder to express his or her dissatisfaction in an accessible manner and free of charge, and for the pension fund to respond appropriately.

Complaints policy

This complaints policy describes how SNPS handles complaints. A complaint is first handled by Achmea Pensioenservices (APS), the organisation to which SNPS has outsourced its pension administration. In the unlikely event that this complaint is not resolved to the satisfaction of the stakeholder, the board, with the possible support of the management of Shell Pensioenbureau Nederland B.V. (SPN), will come to a decision as the second step for an escalated complaint. Where this document refers to 'the pension fund', it also refers to, where applicable, the employees of APS and SPN who are involved in complaints handling on behalf of SNPS.

The pillars of our complaints policy

The complaints policy of SNPS is based on three pillars:

1. Stakeholders can express their dissatisfaction and provide feedback without any obstacles through an accessible, free, simple and unambiguous complaints procedure.
2. Stakeholders can expect their complaints to be handled in a professional, understanding, careful and consistent manner. At the same time, the pension fund expects to be treated with integrity and respect by the stakeholder lodging the complaint.
3. The pension fund considers a complaint to be an indicator that can possibly be used to permanently (further) improve its services and therefore the satisfaction of stakeholders.

The complaints policy aligns with a number of SNPS strategic governance topics, including participant experience (maintaining high participant satisfaction), outsourcing (maintaining the quality of APS service and service delivery by SPN) and acting as a learning organisation. The complaints policy also complies with the legal requirements from the Future Pensions Act and the Pension Federation's guidelines 'Handling complaints effectively'.

¹ Stakeholders may include participants, former participants, pension beneficiaries, other entitlement beneficiaries or individuals who believe they may derive rights from the pension fund as well as their representatives.



Accessible, free of charge, simple and unambiguous complaints procedure

The pension fund is open to (escalated) complaints and ensures that a stakeholder is able to express his or her dissatisfaction towards the pension fund without any obstacles. This is ensured by the attitude and behaviour of the staff involved, in conjunction with the accessible, free of charge submission and handling of the complaint, and a simple and unambiguous complaints procedure. In doing so, the pension fund applies the following principles:

- The pension fund considers any expression of dissatisfaction by a stakeholder as a complaint and acts accordingly.
- The employees concerned are receptive to (escalated) complaints and feedback from stakeholders, adopting a professional and understanding attitude.
- All (escalated) complaints will be treated confidentially.
- The pension fund ensures that a stakeholder has the opportunity to easily learn about the complaints procedure and to know exactly where to go with any questions.
- Where necessary, the staff concerned proactively draws stakeholders' attention to the complaints procedure and, where desired, offers assistance in filing an (escalated) complaint.
- The pension fund makes a clear distinction in the complaints procedure between a complaint, an escalated complaint, and a dispute². A complaint is handled by APS, who also makes a decision on the case. For an escalated complaint, the board makes a decision, with SPN management providing support. A dispute is submitted to the external dispute body for pension funds³. In addition, the stakeholder has the option at all times to file a claim with the Dutch courts, if so desired.
- The board may also, on the basis of well-founded reasons notwithstanding the above, directly consider a complaint and take a decision on it, with the support of the management of SPN.
- The pension fund's ambition is for all expressions of dissatisfaction to be dealt with through the internal complaints procedure and to not lead to a dispute that requires settlement through an external party.
- The pension fund ensures that after each step in the complaints procedure, the stakeholder will know where he/she stands in terms of follow-up steps and processing times.
- The pension fund ensures that a stakeholder receives clearly understandable, accessible and correct information concerning the (follow-up) steps and any corresponding deadlines for the complaints procedure, and also ensures that the possible actions available to the stakeholder are clear. Possible actions refers to the stakeholder knowing what the next step in the complaints procedure is, what is expected of the stakeholder in this regard, and what the stakeholder can expect from the pension fund.

² A dispute may arise from the complete or partial rejection of an (escalated) complaint concerning the 'execution of the pension regulations' by the pension fund or if such an (escalated) complaint has not been settled within the set time limit.

³ You can contact the Geschilleninstantie Pensioenfonds (external dispute body for pension funds) via their website www.geschilleninstantiepensioenfonds.nl.



Professional, understanding and consistent complaint handling

The pension fund recognises that demonstrating proper handling of (escalated) complaints can contribute to participant satisfaction, increase trust levels and further improve the reputation of the pension fund and the pension industry as a whole. The pension fund therefore strives to achieve complete stakeholder satisfaction concerning the handling of an (escalated) complaint. Regardless of whether the (escalated) complaint is accepted or rejected. In addition to the diligent handling of substantive complaints, this also specifically calls for a stakeholder-centred approach. The pension fund applies the following principles in its handling of complaints:

- The relevant employees of APS and SPN have the competence to handle (escalated) complaints and feedback properly, have knowledge of and access to the current internal complaints procedure and the Pension Federation's guidelines on Handling complaints effectively, and act accordingly.
- The pension fund handles an (escalated) complaint carefully with an emphasis on the human element. This means that the staff involved will at least offer a listening ear, empathise with the stakeholder's personal situation and interests, and take into account the emotions that the stakeholder (may) be experiencing. The pension fund will observe the applicable laws and regulations and ensure that (escalated) complaints are handled consistently and coherently in terms of substance. In other words: standard practices are to be applied where possible and individualised where necessary.
- The pension fund provides accurate and clearly understandable information to the stakeholder concerning the progress of the complaint handling.
- The pension fund decides on an (escalated) complaint as soon as possible, and in any case within the applicable statutory time limits.
- The pension fund ensures careful decision-making for an (escalated) complaint. This means that the pension fund properly substantiates any acceptance or rejection of an (escalated) complaint in language that is understandable to the stakeholder, and the pension fund offers a personal explanation of a rejection of an (escalated) complaint to the stakeholder, if required.
- Complaints and any subsequent escalated complaints are handled confidentially and always by different people. Those handling an escalated complaint have not been previously involved in the resolution of the complaint.

The integrity of a stakeholder making a complaint in good faith is the starting point for the pension fund. In addition to professional, understanding and consistent complaint handling from the pension fund, the pension fund also expects fair and respectful treatment from the complaining stakeholder towards APS and SPN staff (and board members) engaged in the complaint handling process. A critical, and in some cases possibly emotionally charged attitude towards the pension fund is understandable in appropriate cases, but any discriminatory or racist language, verbal, physical or sexual aggression, or other intimidating behaviour will not be accepted by SNPS. Such behaviour, if repeated after the stakeholder lodging the complaint has been addressed, may in extreme cases and with substantiation, lead to the discontinuation of the complaint handling process.



Continuous improvement of services and optimisation of participant satisfaction

The pension fund considers (escalated) complaints as an opportunity to (further) improve its services and therefore to optimise customer satisfaction. Mistakes can and do happen, provided they are treated as a learning opportunity. To achieve this, the pension fund applies the following principles:

- The pension fund tests stakeholder satisfaction with the handling of (escalated) complaints, proactively asks about possible areas for improvement, and provides feedback to the employees concerned. Board members of the pension fund are randomly involved in assessing participant satisfaction with the complaint handling process.
- The pension fund has up-to-date records of (escalated) complaints, recording at a minimum: the name and address of the stakeholder, the complaint, the date of receipt of the complaint, a description of the complaint, a description of the handling of the complaint, and the date on which the complaint was closed.
- SPN and APS discuss an anonymised report of all incoming complaints and feedback during the operational meetings held every six weeks, and agree on follow-up actions where necessary to optimise services.
- The board receives an anonymised report of complaints through the dashboard at least quarterly, which is then discussed at the board meeting.
- Board members of the pension fund are demonstrably involved in complaint handling through their decision-making process with regard to escalated complaints where applicable.
- The pension fund is transparent about (escalated) complaints and feedback provided by stakeholders to the pension fund by reporting on this at an aggregate level in the annual report and sharing 'lessons learned' with stakeholders where possible and useful.

Complaints policy review

The board reviews the complaints policy including the complaints procedure at least once a year and adjusts it where necessary.