



SSPF and SNPS Complaints and disputes procedure

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Introduction

The Shell pension fund is committed to careful and accurate pension administration, timely and correct payment of pensions and providing proper services. Despite these efforts, it is possible that you may not be (entirely) satisfied with the way the pension fund implements the¹ pension regulations and/or the way the you feel you are treated by the pension fund. In this case, the pension fund offers you the opportunity to express your dissatisfaction, giving the pension fund the chance to act accordingly. This complaints and disputes procedure is an elaboration of the provision contained in the constitution concerning the board's adoption of a complaints procedure and that it complies with all current legal requirements. The complaints and disputes procedure describes how to express your dissatisfaction towards the pension fund and gives you insight into the possible follow-up steps and corresponding deadlines. Your complaint will always be treated confidentially. Filing and handling a complaint is free of charge.

A. Definitions

To the extent that these complaints and disputes procedure terms are used as defined in the constitution of the pension fund or the applicable pension regulations, they shall have the same meaning.

In this complaints and disputes procedure, the following terms are defined:

- **Stakeholder**
The person who, by virtue of the constitution and/or the pension regulations, has or believes that he or she has rights with regard to the pension fund. This includes participants, former participants, other entitlement beneficiaries and pension beneficiaries of the pension fund as well as their representatives.
- **Complaint**
Any expression of dissatisfaction addressed by a stakeholder to the pension fund².
- **Escalated complaint**
A complaint that has not been resolved to the satisfaction of the stakeholder by Achmea Pensioenservices in the first step of the process and for which the board, with the possible support of the management of Shell Pensioenbureau Nederland, will make a decision in the second step.
- **Dispute**
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 an (escalated) complaint has not been settled within the set time limit.

¹ Consider, for example, an individual matter about your pension entitlement or the amount of your benefit.

² Any complaint that a stakeholder has regarding the board or the Accountability Body exercising its membership will not be regarded as a complaint within the meaning of this complaints and disputes procedure.



B. Internal complaints procedure

1. Stakeholders may complain to Achmea Pensioenservices, the pension administrator of the Shell Pension Fund. The manner in which a stakeholder submits a complaint is not formalised and may, for example, be submitted by telephone, via the website or by letter. The contact details of Achmea Pensioenservices are included in section E of this complaints and disputes procedure.
2. Achmea Pensioenservices will confirm receipt of the complaint in writing to the stakeholder as soon as possible. The confirmation of receipt may accompany Achmea Pensioenservices' reasoned response as referred to in point 3 below. In other cases, Achmea Pensioenservices may contact the stakeholder by telephone within 5 days of receiving the complaint.
3. Achmea Pensioenservices will issue a reasoned decision on the complaint to the stakeholder no later than two weeks after receipt of the complaint, unless Achmea Pensioenservices has communicated a different deadline to the stakeholder.
4. If the stakeholder does not (entirely) agree with the decision of Achmea Pensioenservices, the stakeholder may apply to the board of the pension fund no later than four weeks after receipt of this response. In that case, this is referred to as an escalated complaint. The manner in which a stakeholder submits an escalated complaint is not formalised. The contact details of the board are included in section E of this complaints and disputes procedure.
5. The board will confirm receipt of the escalated complaint in writing to the stakeholder as soon as possible. The confirmation of receipt may accompany the board's reasoned response as referred to in point 7 below.
6. If required, the board will give the stakeholder an opportunity to further explain the escalated complaint in a manner and time to be determined by the board in consultation with the stakeholder. The management of Shell Pensioenbureau Nederland B.V. may provide support to the board in this regard.
7. The board will issue a reasoned decision on the escalated complaint to the stakeholder no later than four weeks after receipt of the escalated complaint. The management of Shell Pensioenbureau Nederland B.V. may provide support to the board in this regard.
8. 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 possible support of the management of Shell Pensioenbureau Nederland B.V.
9. If Achmea Pensioenservices or the board requires further information from the stakeholder for the resolution of the (escalated) complaint, it will request that the stakeholder send this information within a stated response period. The period of two weeks for Achmea Pensioenservices as mentioned in point 3 above and the period of four weeks for the board as indicated in point 7 above, will be extended by the response period for supplying further information, or by the period in which the requested information is received if this is shorter.
10. 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.
11. All complaints and escalated complaints received will be recorded in the pension fund's complaints administration, including the name and address of the stakeholder, the (escalated) complaint and a description of the complaint and any escalated complaint including the date of receipt, method of handling and date of closure.



C. External dispute procedure³

1. If the stakeholder does not (entirely) agree with the outcome of the internal complaints procedure as mentioned under point B above with regard to an (escalated) complaint on the implementation of the pension regulations, the stakeholder may apply to the external dispute body for the pension fund.
2. If the (escalated) complaint has not been handled by Achmea Pensioenservices or the board within ten weeks (or twelve weeks after the complaint has been submitted by the stakeholder if no acknowledgement of receipt has been sent), the stakeholder may also apply to the external dispute body for the pension fund. The foregoing does not apply if the stakeholder and the pension fund have agreed to complete the internal complaints procedure in full first despite the expiry of the aforementioned deadlines.
3. Once the external dispute body for the pension fund has handled the stakeholder's complaint, the internal complaints procedure is closed and it is then referred to as a dispute.
4. The stakeholder may submit a request to the external dispute body for the pension fund for mediation by the Pensions Ombudsman or for a settlement of the dispute.

D. Courts

1. The stakeholder has the option at all times to file a claim with the Dutch courts, if so desired.

³ You can contact the Geschilleninstantie Pensioenfondsen (external dispute body for pension funds) via their website www.geschilleninstantiepensioenfondsen.nl. They handle disputes between the stakeholders and the pension fund. The fund's internal complaints procedure must have been completed in full before the external dispute body may accept the request. The contact data of the Geschilleninstantie Pensioenfondsen are: Varrolaan 100, 3584 BW Utrecht. E-mail address: info@gjipcontact.nl.



E. How can participants reach the pension fund with an (escalated) complaint?

The stakeholder may submit the (escalated) complaint in several different ways. You choose which way is most comfortable for you.

Contact details in case of a complaint

- By phone:
+31 (0)88 462 34 56
You can call us between 8.30 a.m. and 5.00 p.m. on working days.
- Through the Shell pension funds [website](#)
- By letter
Shell Pension
P.O. Box 35
7300 AA Apeldoorn
Important: Please include your date of birth and telephone number in your letter.

Contact details in the event of an escalated complaint

- By phone:
+31 (0)88 462 34 56
You can call us between 8.30 a.m. and 5.00 p.m. on working days.
We will make sure your escalated complaint gets to the board.
- Through the Shell pension funds [website](#)
We will make sure your escalated complaint gets to the board.
- By letter
Shell pension funds
Attn. The board
P.O. Box 65
2501 CB The Hague