

## COMPLAINT HANDLING PROCEDURE

### General Provisions

This procedure shall apply as soon as the compliance officer considers that the claim should be considered a complaint (as defined below).

#### Section 1 - Definitions

In these regulations, the terms and expressions used below are defined as follows:

- Institution: Towers Watson LifeSight OFP (hereinafter referred to as TW LifeSight OFP or IORP)
- Stakeholder: the person who, by virtue of the IORP's articles of association and/or the Pension Scheme Rules administered by the IORP, can derive, or thinks he or she can derive, rights with regard to the IORP.
- Complaint: a statement by the Stakeholder that considers that his or her rights have been violated.

#### Section 2: Complaints Procedure

##### Article 1 - Admissibility of the complaint

The complaint must meet several conditions before it is deemed admissible:

- The complaint may not be anonymous and must state the name and address, e-mail and telephone number of the Stakeholder;
- The complaint must be sent in writing or by e-mail;
- The complaint may not be about a complaint from the Stakeholder which is currently being dealt with or which has already been dealt with and has been definitively ruled on.
- The complaint may not relate to privacy issues within the scope of the GDPR legislation. Complaints relating to 'data privacy' must be made in accordance with the GDPR policy and are described in the GDPR affiliation letter.

The Compliance Officer shall keep a register of complaints at the IORP's administrative address, of which the progress shall be discussed at each Board of Directors and at each competent Other Operational Body responsible for the day-to-day management of the Separate Account (insofar as the complaint relates to the Separate Account).

##### Article 2 - Filing a complaint

A Stakeholder should address the Compliance Officer in writing or by email with a completed complaint form.

In this complaint form, the Stakeholder must provide a description of the complaint and all relevant information about this complaint. This may include where, when and/or why the Stakeholder believes he or she has been treated incorrectly, what happened exactly, what has already been done about it etc. Documents substantiating the complaint should be included.

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### **Article 3 - Registration and eligibility check**

The Compliance Officer registers the complaint and informs the Board of Directors and the competent Other Operating Body responsible for the day-to-day management of the Separate Fund (insofar as the complaint relates to the Separate Fund).

The Compliance Officer examines the eligibility of the complaint within one month after receipt of the complaint form.

If the complaint is found to be eligible, the Stakeholder shall be informed in writing of the next steps in the process and the expected timing for the handling of the complaint.

If the complaint is declared unfounded, the Stakeholder shall be informed in writing and the reasons

### **Article 4 - Examination of the complaint**

The complaint will be handled confidentially. Anyone involved in handling the complaint is bound to secrecy.

The Compliance Officer is obliged to further investigate the complaint filed.

If requested, the Compliance Officer shall give the Stakeholder the opportunity to be heard on a date and at a place agreed by both parties. This date shall be agreed upon at least two weeks in advance, unless both parties agree to an earlier date for the interview.

The investigation of the complaint should be completed within a reasonable period of time. This period should ordinarily not exceed a period of 3 months from the date of the written notification of the eligibility of the complaint. If the investigation cannot be completed within the period of 3 months, due to the complexity of the complaint, the Compliance Officer will notify the Stakeholder in writing (by letter or by e-mail) stating the reason for the delay.

### **Article 5 - Opinion**

As soon as possible after the examination of the facts and any hearing of the Stakeholder (if any), the Compliance Officer shall ensure that the Board of Directors, in consultation with the competent Other Operational Body responsible for the day-to-day management of the Separate Account (insofar as the complaint relates to the Separate Assets), deliberates on this matter.

This deliberation may be held by means of telephone calls, video conferences or other means of communication whereby all participating board members and members of the Other Operational Body are able to communicate with each other simultaneously. The Compliance Officer shall report on this deliberation and formulate a proposal.

The Board of Directors, in consultation with the competent Other Operational Body of the Separate Account, shall deliberate on the recommendation of the Compliance Officer. After the Board of Directors has decided in consultation with the Other Operational Body, the Compliance Officer notifies the Stakeholder in writing (by letter or by e-mail) of the decision, stating whether or not measures have been taken in response to the complaint. The Compliance Officer shall accompany the decision with the possibility of submitting the complaint to the competent court.

**TOWERS WATSON LIFESIGHT OFF**

Pension Funding Organisation

Institution for occupational retirement provision authorised as of 25 August 2015 (FSMA 50.616)

Da Vincilaan 5 | Building Caprese | 1930 Zaventem | Belgium

Company number 629 749 932



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Approved by the Board of Directors on 9 November 2021

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Els De Jaeger  
Chairman of the Board  
Towers Watson LifeSight OFF

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Sven Schroven  
Vice- Chairman of the Board  
Towers Watson LifeSight OFF

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**APPENDIX I - COMPLAINT FORM**

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**Your details**

Mister/Miss

First name

Last name

Address

Postal code - city

Telephone number

E-mail address

Date when you established the fact that the complaint is based on

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**Description of your complaint**

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**Your request**

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**Please return to this form to the following address:**

Elise Laeremans

[elise.laeremans@youunity.be](mailto:elise.laeremans@youunity.be)

Vorstlaan 36/8

1170 Brussel