

NOWOS

Complaints Handling Policy

At Nowos, we envision a global economy that uses business as a force of good. This economy is comprised of a new type of corporation, which is purpose-driven and creates benefit for all stakeholders. We aim to not only reclaim raw materials from Lithium-Ion batteries, but to reclaim them in a way that has a positive effect on our planet, people and profit. We aim to add value by treating used Lithium Ion batteries not as waste, but as a valuable material for re-creation:

- We believe you should actually get paid for your used products! Recycling should be cheaper than digging materials from the ground.
- Moreover, we believe the process of reclaiming raw materials should have no additional negative side effects on the planet and people, giving our earth and population a chance to regenerate!

This asks of our partners and us to co-create a radically different process of reclaiming raw materials: more efficient, better in quality, with less negative side effects. This people oriented, environmental approach is also expressed in the company name: 'NOWOS', meaning *a new common spirit, living again*¹.

Our core activities include:

1. Recycling of useful materials from urban waste (Urban Mining) and the facilitation of end-to-end circular and logistic processes in the field of Lithium Ion batteries (Reversed logistics);
2. Providing advice and services with regard to all aspects of safe handling, legal rules and administration in relation to Lithium Ion and all other (logistic) processes concerning battery waste.

Introduction

For Nowos, having good and transparent relationships with its stakeholders is very important. Nowos 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 policy describes the measures that Nowos 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.

¹ "Nous" meaning "spirit" in Greek and "we" in French: our common spirit, we are in this together.

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Definitions

- *Complainant*: natural or legal person who is presumed to be eligible to have a Complaint and who has already lodged a Complaint.
- *Complaint*: any statement of dissatisfaction explicitly addressed to Nowos by a natural or legal person relating to the provision of products, services, or the actions of Nowos.
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 Nowos can be considered as a Complaint, provided that the statement was made via an official channel of Nowos, where it also (re)actively communicates with individuals, for example via a response to the official Facebook page.
- *Compliance Detective*: the person with the role of Compliance Detective, responsible for handling complaints.

Nowos serves its mission through the capabilities and human relationships of its co-workers. Clear governance structures aim to support and enhance those capabilities and relationships and should never be a goal in itself.

Organization

1. Compliance Detective: a Compliance Detective responsible for the investigation of Complaints is in place, which enables Complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.
2. General principles for Complaints handling within Nowos:
 - Each team must have one central, clearly communicated and easily accessible point of contact where Complaints can be filed;
 - Each Complaints handling procedure must at least:
 - a. give clarity on response times; in principle the response time for reaching a decision should be 6 weeks at the maximum, and;
 - b. include the possibility of internal appeal.
 - Complaints must be carefully recorded and reported and the collected data must be carefully analyzed in order to recognize any important patterns and take action where necessary.
3. Register: each team keeps an adequate internal administration that registers each Complaint received in an appropriate way.
4. Internal follow-up of Complaints-handling: complaints handling data are analyzed 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:
 - analyzing the causes of individual Complaints to identify root causes common to types of Complaint;
 - considering whether such root causes may also affect other processes or products, including those not directly complained of;
 - and correcting, where reasonable to do so, such root causes.

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5. Role of Compliance Detective: the Compliance Detective is responsible for 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 our products and our services, he or she shall carefully analyze the Complaints and Complaints handling data to ensure that any risks or issues are identified and addressed.

Procedures

1. Receiving of / responding to Complaints:
 - Complaints may be submitted free of charge.
 - Upon receipt of a Complaint, each team 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 team should inform the Complainant about the causes of the delay and indicate when it's investigation is likely to be completed;
 - When communicating Nowos' 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.
2. Provision of information:
 - Details of the procedure to be followed when handling a Complaint are made public 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 Compliance Detective.
 - This information shall also be provided to stakeholders on request, or when acknowledging a Complaint.
 - The information about the Complaints handling process must be clear, accurate and up-to-date.
 - (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.
 - any national alternative dispute resolution entities used by the team.
 - The Complainant shall be kept informed about further handling of the Complaint.