Invest International

Complaints Procedure
Competition Complaint

October 2026

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1. Introduction

Invest International[1] (hereinafter: “Invest”) supports international activities of companies and international projects that contribute to the Dutch economy, including international projects that have a positive impact on global challenges in developed, emerging, and developing countries.

In order to achieve these goals, Invest International is capitalized with funds, provided by the State of the Netherlands and as a result, Invest International is subject to the applicable rules and regulations of the state aid framework. This state aid framework aims to ensure that i.e. Invest International shall refrain from activities that distort proper functioning of, and competition within, the EU internal market.

In the table below an overview is provided of the division of responsibilities with regard to state aid related subjects within Invest. In case of a question or an issue concerning one of the following topics, the listed persons to be contacted:

Subject	**First point of contact**
Ad hoc questions	Legal Counsel
Complaint handling	Legal Counsel
Client case file	Investment Manager

1.1 Scope and purpose

In connection with the applicable state aid framework, undertakings have the right to file a complaint if they have reason to believe that Invest International is distorting the internal market of the EU. Invest International is obliged by law[2] to publish an adequate complaint handling procedure on its website.

With the Competition Complaints Procedure, Invest International is fulfilling its lawful obligation, which Competition Complaints Procedure describes the handling of competition complaints received by Invest International.

The Competition Complaints Procedure as included in Chapter 2 of this document will be published on the website of Invest International.

[1] Invest International is a term which is used for the group of following existing companies: Invest International Holding B.V., Invest International Capital B.V., Invest International Development B.V., and Invest International Public Programs B.V. Any other new incorporated companies controlled by Invest will fall under this definition.

[2] *Source (link): Artikel 10 Machtigingswet oprichting Invest International.*

2. Complaints Procedure Competition Complaint Invest International

The following procedure is considered the Complaint Procedure Competition Complaint Invest International and the integral language will be published on the website of Invest International:

Complaints Procedure Competition Complaint Invest International

Version: 1.2

Version date: September 2026

Article 1 – Definitions

In this complaints procedure, the following definitions apply:

a. *Invest International*: the private company Invest International B.V., as referred to in Article 10 of the Enabling Act (including any of its subsidiaries, as the case may be);

b. *Complainant*: any company that files a Competition Complaint with Invest International;

c. *Complaints Officer*: the person in charge of handling the Competition Complaint, namely an employee of the Legal Department or a person designated for this purpose by the General Counsel;

d. Enabling Act: the Act containing the authorization to establish the Dutch financing and development institution Invest International (Enabling Act establishing Invest International);

e. *Competition Complaint*: a complaint notice in which the Complainant asserts and substantiates that a particular activity of Invest International or one of its subsidiaries indicated in the complaint notice - other than the activity that is carried out by virtue of mandate, power of attorney or authorization of the Minister concerned - leads to undesirable competition with companies from the point of view of good market functioning.

f. *Minister*: the Minister of Foreign Trade and Development Cooperation.

Article 2 - General principles

1. The purpose of this complaints procedure is to establish a procedure for dealing with competition complaints within a reasonable period of time.

2. A Competition Complaint is filed with Invest International, attn. the Legal Department, Bezuidenhoutseweg 12, 2594 AV The Hague or by email to: legal@investinternational.nl.

3. Companies can submit a Competition Complaint to Invest International free of charge.

4. This complaints procedure is clearly known and easily accessible on the Invest International website.

5. The complainant will receive a written acknowledgement of receipt from Invest International within two weeks of receipt of the Competition Complaint.

6. A Competition Complaint can only relate to investment activities of Invest International.

7. A Competition Complaint must contain at least:
   a) the name and address of the Complainant;
   b) the date;
   c) a substantiation of the Competition Complaint; and

d) the signing by the Complainant.

8. If the Competition Complaint is drawn up in a foreign language (other than English) and a translation is necessary for the proper handling of the Competition Complaint, the Complainant must provide such translation.

9. If the Competition Complaint does not meet the conditions set out in paragraphs 7 and 8 of this Article, the Complainant shall still be given the opportunity to comply with these conditions. He shall be given a written request with a time limit. If this period expires unused, Invest International may decide not to deal with the Competition Complaint.

10. Invest International is not obliged to deal with a Competition Complaint if it relates to an activity or service of Invest International:
    a) which has since been terminated;
    b) on which a Competition Complaint has already been lodged, which has been dealt with in accordance with this complaint procedure; or
    c) which, by initiating proceedings, is or has been subject to the judgement of a civil court, any complaints institution or the European Commission.

11. Invest International is also not obliged to admit a Competition Complaint if the Complainant's interest is apparently insufficient.

12. The Complainant shall be informed of inadmissibility of the Competition Complaint as soon as possible, but no later than four weeks after receipt of the Competition Complaint, in writing and substantiated with regard to the dismissal.

Article 3 - Complaint procedure

1. Upon receipt of a Competition Complaint, the Complaints Officer of Invest International will report this to the Minister within two weeks of the date of receipt.

2. The Complaints Officer coordinates the substantive investigation that Invest International is conducting in response to a Competition Complaint.

3. Invest International shall give the Complainant the opportunity to be heard. Hearings may be waived if:
    a) the Competition Complaint is manifestly unfounded;
    b) the Complainant has stated that he does not wish to exercise the right to be heard; or
    c) the Complainant does not declare within a reasonable period of time set by Invest International that he wishes to exercise the right to be heard.

4. The Complainant may be assisted by another person or represented by an authorised representative. Invest International may require written evidence from an authorized representative to establish if the representative is authorized to represent the Complainant.

5. A report is made of the hearing by an employee of Invest International. The Complainant shall receive a copy of this report.

6. Invest International will handle a Competition Complaint within 12 weeks of receipt of the Competition Complaint. Invest International may postpone the handling of the Competition Complaint for a maximum period of 10 weeks. The adjournment shall be notified in writing to the Complainant.

7. If, after the investigation, Invest International finds that a Competition Complaint is well-founded, Invest International will inform the Complainant in writing as soon as possible that it will honor the Competition Complaint.

8. The honoring of a Competition Complaint does not imply the opinion that the activity and/or service undertaken by Invest International up to that point was also unlawful. That judgment is and will remain up to the civil court in the context of an unlawful act action.

9. If a Competition Complaint is not honored by Invest International, Invest International will inform the
Complainant in writing and with reasons of the findings of the investigation into the Competition Complaint, Invest International's opinion on this and any conclusions that Invest International draws from it.

10. At the end of each quarter, Invest International reports on the status of the handling of a submitted Competition Complaint to the Minister.

Article 4 - Registration and publication

Both the Competition Complaint and its handling and any measures taken are registered in the Invest International complaints database. The internal complaints report is discussed quarterly in the management meeting and, where necessary, improvements are proposed for the handling of complaints. If necessary, processes within Invest International are adjusted to prevent complaints in the future.

Article 5 - Final provision

1. This regulation is referred to as *Complaints Procedure Competition Complaint Invest International*.

2. This complaints procedure enters into force on 6 June 2023.

Invest International

Let’s build the sustainable markets of tomorrow together.

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