

# Financial Services Guide

Willis Employee Benefits Pty Ltd

1 October 2021

## Lack of independence in relation to the provision of personal advice to retail clients

We are not independent, impartial or unbiased in the provision of personal advice to retail clients. This is because in certain cases a conflict of interest arises i.e. circumstances where some or all of our retail clients' interests are inconsistent, or diverge from, some or all of our interests. This may happen where:

- we may receive remuneration or other gifts or benefits from:
  - the issuer of the products retail clients buy (e.g. brokerage that we retain); or
  - other third parties for related services provided in connection with the personal advice service (premium funding, claims or loss adjusting or reinsurance services),

which may reasonably be expected to influence the personal advice provided to our retail clients;

- we may be subject to direct or indirect restrictions relating to the financial products in respect of which personal advice is provided; and
- we have associations or relationships with issuers of financial products and others that might reasonably be expected to influence the personal advice provided to retail clients (as covered in this FSG).

**However**, it is important to note that when providing personal advice we are required under the Corporations Act 2001 to always act in our clients' best interests. We also have procedures for the proper management of conflicts of interests as covered in this FSG.

## Introduction

This Financial Services Guide (FSG) is designed to assist you in deciding whether to use any of the financial services, provided by Willis Employee Benefits Pty Ltd, ABN 68 059 019 911, AFSL 233764 (**Willis Towers Watson**) that are described in this FSG.

This FSG contains information on:

- The services we are authorised to provide to you
- Our remuneration
- Our internal and external dispute resolution procedures
- Other important information.

## Other documents you may receive from us

### STATEMENT OF ADVICE (SOA)

If you are an individual or small business and purchase retail or personal insurance, we may provide you with personal advice that takes into account your personal needs, objectives or financial situation. If you receive personal advice, we will provide you with a Statement of Advice (SoA) which will contain our advice, the basis of our advice, any commission, fees and any other benefits, where possible, in actual dollar amounts, and any associations we have with Insurers or other parties which may have influenced the advice provided. We will give you this SoA before we proceed to act on your instructions.

### PRODUCT DISCLOSURE STATEMENT

If you are an individual or small business and purchase retail or personal insurance, where required, we will give you a Product Disclosure Statement (PDS) when recommending to you a particular insurance product. The PDS is prepared by the Insurer and contains information about the product recommended, to help you make a more informed decision about whether or not to purchase the product.

## Who is Willis Towers Watson?

Willis Towers Watson is a general insurance intermediary, and our ultimate parent is Willis Towers Watson PLC, a company incorporated in the Republic of Ireland and listed on NASDAQ.

## What financial services are we authorised to provide?

Willis Towers Watson has an Australian Financial Services Licence and the number is 233764. This licence allows us to provide advice on and deal in Investment Life Insurance Products, Life Risk Insurance Products and Superannuation, to retail and wholesale clients.

## What are our services?

Where we act as your insurance broker, we will discuss with you your insurance requirements, including the scope of cover and limits to be sought, and cost. Upon receipt of your instructions, whether written or oral, we will endeavour to satisfy your insurance requirements.

During the course of the placement of your insurance we will keep you informed of the progress of our negotiations and identify any inability to obtain coverage sought by you.

We will use reasonable endeavours to implement your insurance programme, subject to available insurers, before the intended date of inception, renewal or extension of cover (whichever is appropriate).

We will provide you with information about the insurance cover that we will advise and recommend to you to enable you to decide whether to accept the insurance cover available. We will answer any questions you may have about the available cover, its benefits, restrictions, exclusions and conditions.

We do not offer advice in relation to tax, accounting, regulatory or legal matters. You should take separate advice as you consider necessary regarding such matters.

## How can you instruct us about your insurance?

You may instruct us about your insurance by telephone or in person, by fax or email, or by other means as we agree with you.

## Who do we act for?

As an insurance broker we normally act for you as your agent.

We will tell you if we are not acting for you in providing any of the financial services.

For example, for some insurance products, insurers grant us a binding authority or similar facility to accept business on their behalf. When we place your insurance under a binding authority or similar facility, we act for you when we provide you with advice or product recommendation, but we act for the insurer when we issue the insurance contract.

We may also be granted an authority by insurers, for example under a binding authority, to settle claims on your insurance. We act for the insurer when we settle claims within the terms and conditions of the authority granted. It is our policy to refer claims to insurers for settlement decision where we are not able to settle the claims on a 100% basis.

## What if we have a conflict of interest?

Circumstances may arise where we may find we have a conflict of interest in, or otherwise have a material interest in or related to, a matter in which we are acting. For example, we may be asked to act on behalf of any insurer in the appointment of a loss adjuster; or we may find that the interests of two of the clients for whom we act, conflict.

We have conflict management procedures and we seek to avoid conflicts of interest but where a conflict is unavoidable we will explain the position fully and manage the situation in such a way as to avoid prejudice to any party.

The insurance market is complex and there could be other relationships not described here which might create conflicts of interest. Whatever the circumstances, we will act in your best interests and, if a conflict arises for which there is no practicable solution, we will withdraw unless you wish us to continue to act for you and provide us with your written consent to that effect.

## What are our Professional Indemnity provisions?

Willis Towers Watson has Professional Indemnity cover in place which satisfies the requirements for compensation arrangements under section 912B of the *Corporations Act 2001*. Subject to the terms and conditions, this includes coverage for existing and former employees for insurance services conducted as employees of Willis Towers Watson.

## What should you do if you have a complaint?

Willis Towers Watson has a formal complaints procedure. Should you have a complaint please contact your Willis Towers Watson client advocate in the first instance.

Alternatively, you may contact our Complaints Officer on:

**T:** (02) 9285 4000

**E:** [compliancequeries.au@willistowerswatson.com](mailto:compliancequeries.au@willistowerswatson.com).

We will acknowledge your complaint within one business day of receipt and advise you who the prime contact for handling your complaint is. We aim to resolve complaints within 30 days of receipt but if your complaint is complex and may take more than 30 days to resolve, we will keep you informed on the progress and when we expect to provide our final response.

We are a member of the Australian Financial Complaints Authority (AFCA), an external dispute resolution facility. If an issue has not been resolved to your satisfaction, you can lodge a complaint with AFCA. AFCA provides independent financial services complaint resolution that is free to consumers.

**W:** [www.afca.org.au](http://www.afca.org.au)

**E:** [info@afca.org.au](mailto:info@afca.org.au)

**T:** 1800 931 678 (free call)

**In writing to:** Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

You can also contact Willis Towers Watson to comment upon our service at [www.willistowerswatson.com/en-AU/Contact-Us](http://www.willistowerswatson.com/en-AU/Contact-Us).

## What about Privacy?

We respect your privacy and are committed to protecting your personal information. Our Privacy Policy explains how Willis Towers Watson collects, uses and discloses the personal information you provide and what Willis Towers Watson expects of you in this regard.

By proceeding to deal with us, you confirm on your behalf and/or on behalf of those you represent, agreement to the collection, use and disclosure of personal information

Please contact your WTW client advocate or local WTW office or visit our website for a copy of our Privacy Policy.

[www.willistowerswatson.com/en-AU](http://www.willistowerswatson.com/en-AU)

## What is your Duty of Disclosure?

In order to make our business relationship work, you must provide complete and accurate information and instructions in a timely manner, so that we can assist you fully.

Please bear in mind that there is no duty on insurers to make enquiries of you. You have a duty to disclose to the insurer before a contract of insurance is entered into, every matter that is known to you that is relevant to the decision of the insurer whether to accept the risk.

Failure to comply with your duty of disclosure may allow insurers to avoid liability for a particular claim or to void the policy. This duty of disclosure applies equally on taking out new insurance policies and on renewal or any change (variation, extension or endorsement) to your policies. We will not be responsible for any consequences which may arise from any delayed, inaccurate or incomplete information.

## What if there is a change in your circumstances?

You must advise us as soon as reasonably practicable of any changes in your circumstances that may affect the services to be provided by us or the cover provided under your insurance policy. We may need to give you advice as to the suitability of the insurance for your changed circumstances to ensure it remains appropriate for your needs, objectives and financial situation.

## How do you pay for our services?

Generally the payment we receive will be based on an agreed fee for a service and / or a commission from yourself and/or a product issuer. Payments may vary materially depending on the extent of the service requested and the range of areas products need to cover. Details of the payments we may receive from product issuers are generally contained in the PDS you will receive.

Some commissions earned by us on a policy may be refunded if the policy in question is cancelled within twelve months of inception.

If you receive personal advice from us, we will tell you about any commissions, fees and any other benefits, where possible in actual dollar amounts, in the SoA. We will give you this SoA, before we proceed to act on your instructions.

Fees and commissions will vary as stated above. The table below sets out information about the range of fees and commissions we are likely to charge for each service we may provide you:

Service	Fees
<b>Group Life Insurance Products</b>	As agreed with you in advance of provision of the service OR where no prior agreement, up to 30% of insurer premium each year
<b>Retail Life Insurance Products</b>	As agreed with you in advance of provision of the service
<b>Superannuation Fund Consulting Services</b>	By fixed fee as agreed with you

All the fees and commissions referred to above are paid to Willis Towers Watson either monthly, quarterly, semi-annually or annually depending on the date that our clients pay their premiums to us.

You can request further particulars in relation to the remuneration we receive.

## What remuneration is received by our Employees?

Our employees receive an annual salary that may include discretionary annual bonuses based on pre-determined business performance criteria such as client service standards and business profitability. They may also from time to time be eligible to receive incentives or bonuses based on business retention or generation. In addition, employees may be eligible to participate in any Willis Towers Watson share

plan that may be offered on a discretionary basis from time to time.

Our employees may also receive non-monetary benefits, which do not exceed \$300 in value, from insurers.

These benefits may include entertainment at sporting events, hospitality including lunches and attendance at insurer sponsored functions. It is not possible to determine in advance what, if any, non-monetary benefit a representative may receive and these benefits are not generally attributed to any particular product.

## What other remuneration do we receive?

### INSURERS

We may have contracts or other arrangements with various insurers pursuant to which we provide certain services, such as performing risk management surveys or those under binding authorities and delegated claims settlement arrangements (for example, providing statements of the business accepted, issuing certificates of insurance cover or settling claims on behalf of insurers). Under these arrangements we may be paid by the insurers for the services provided to them in addition to any brokerage we may receive for placing your insurance cover.

### PREMIUM FUNDING

You may also choose to use a Premium Funding Finance company (Funder) in connection with the insurance we place for you. The details of your premium funding arrangement will be set out in your separate agreement with the Funder. We will receive a commission of between 0% to 4% of the amount of funding provided to you. We may receive a fee in respect of specific services we provide to the Funder. Please ensure you review the agreement with the Funder, including the remuneration arrangements before making a final decision to use the Funder.

### INTEREST

In the ordinary course of business we may also receive interest on client and insurer monies from the date when we receive funds until we settle with those due to receive them. We confirm that we shall retain that interest rather than pay it to you or the insurer (as the case may be).

### REFERRALS

If you are an individual or small business and purchase retail or personal insurance and you have been referred to us by someone else, we may pay the referrer a share of our fee or brokerage in relation to that referral, generally ranging from a minimum of 1% to a maximum of 50%.

## What association do we have with Related Service Providers?

When arranging cover for you, we may recommend that you use the services of Richard Oliver Underwriting Managers Pty Limited ('**ROOM**'), AFSL Licence Number 238334, a member of Willis Towers Watson Group of Companies.

Willis Towers Watson may receive brokerage from this company if one of their insurance products is purchased, generally ranging from a minimum of 0% to a maximum of 35%.

Willis Reinsurance and ROUM, both members of Willis Towers Watson Group of Companies, may act for insurers with whom your risks are insured, in the placement and administration of the insurer's risks. These activities are separate contracts subject to their own terms and conditions including those relating to remuneration, between the insurer and ROUM or Willis Reinsurance.

## REFERRALS

It may, at times, be appropriate (and for your benefit) for us to use other parties such as wholesale brokers, excess and surplus lines brokers, underwriter managers, managing general agents or reinsurance intermediaries. These parties may also earn and retain commissions for their role in providing products and services for you. If any such parties are part of Willis Towers Watson Group of Companies, we will disclose the form of compensation they will earn before insurance is purchased.

## What other Remuneration arrangements are there within Willis Towers Watson Group of Companies?

### PLACEMENT-SPECIFIC MARKET-DERIVED INCOME

We or other subsidiaries of Willis Towers Watson PLC companies within Willis Towers Watson Group of Companies have contracts with various insurers under which Willis Towers Watson Group of Companies provide certain services, such as those under binding authorities, managing general agency and lineslip arrangements (for example, providing statements of the business accepted and the issuance of certificates of insurance cover).

Willis Towers Watson Group of Companies may also provide reinsurance broking services for insurers. We may also enter into service agreements with certain insurers in order to assist the development of insurance products for our clients.

Under these arrangements Willis Towers Watson Group of Companies may be paid by the insurers for the services we provide to them in addition to any fees or commissions Willis Towers Watson Group of Companies may receive from you for placing your insurance cover.

### CONTINGENT COMPENSATION

Willis Towers Watson Group of Companies may accept certain forms of contingent compensation in locations where they are legally permissible, and meet standards and controls to address conflicts of interest.

Because insurers account for contingent payments when developing general pricing, the price our clients pay for their policies is not affected whether Willis Towers Watson Group of Companies accepts contingent payments or not. If a client of Willis Towers Watson Group of Companies prefers that we not accept contingent compensation related to their account, we will request that the client's insurer(s) exclude that client's business from their contingent payment calculations.

### GLOBAL360 FACILITY – GLOBAL SPECIALITIES CLIENTS ONLY

Willis Towers Watson Group of Companies has developed a facility for business placed through our London Global Specialities businesses called Global360, which offers

underwriting capacity for specialised risks and under which Willis Towers Watson Group of Companies provides a range of services to participating insurers. A separate fee is paid by such insurers for the delivery of these services to them. This fee is calculated within a range, depending on the scale of services provided, further details of which we will identify to you prior to placement. Insurers have agreed that they will bear this fee as part of their operating costs and not to increase premiums directly payable by Willis Towers Watson Group of Companies' clients.

## PANELS

Willis Towers Watson Group of Companies develops panels of insurers in certain market segments. Participating insurers are reviewed on a variety of factors. Commission rates on panel placements may be higher than rates paid on business placed outside of the panel process. Willis Towers Watson Group of Companies discloses its commission rates to clients on quotes obtained through the panel process prior to binding the coverage. In some instances, insurers pay an administration fee to participate in the panel process. Your Willis Towers Watson broker will provide you with additional information on Willis Towers Watson Group of Companies Panels upon request.

## BROKERAGE ON FEE BUSINESS

In some territories outside of North America, Willis Towers Watson Group of Companies obtains brokerage on business where our client pays us a fee. Our intention is to seek remuneration for work that Willis Towers Watson Group of Companies carries out for all parties in the insurance transaction but for which Willis Towers Watson Group of Companies is not otherwise sufficiently compensated. Some examples of this are the vastly-increased cost of regulation, distribution and infrastructure costs. This brokerage that Willis Towers Watson Group of Companies receives is a set percentage and is not contingent on achieving any level of growth, retention or profit on the business concerned. You can choose to exclude your placements from being included in any of these carrier agreements.

## SUBSCRIPTION MARKET BROKERAGE

Willis Towers Watson Group of Companies adds Subscription Market Brokerage in some of its core specialty businesses that place business into the subscription markets, predominantly in London. The principles underlying this Subscription Market Brokerage program include the following:

- Willis Towers Watson Group of Companies is required to handle increased infrastructure costs such as those arising from presentations to and negotiations with multiple entities in the subscription market
- Willis Towers Watson Group of Companies performs additional administrative, regulatory, accounting and support functions in order to complete subscription market placements. These functions benefit our clients and insurers
- Working groups of insurers in the subscription market recognize these additional costs and agree that a negotiated percentage of the premium to account for these costs is appropriate and helps assure competitive access to that market.

Willis Towers Watson Group of Companies believes that the best way to defray the cost of these functions is through this

brokerage. We will disclose the receipt of Subscription Market Brokerage to you.

## **FACILITY ADMINISTRATION CHARGES AND PROFIT COMMISSIONS**

Willis Towers Watson Group of Companies operates a number of “**facilities**” (Binders, Lineslips, Programs, MGAs and Arrangements) under which we undertake a number of tasks. Some of those tasks are purely for the benefit of our clients, others are services that an insurer would be expected to perform.

Our remuneration may reflect this multi-beneficiary approach with what is known as a facility administration charge that covers the cost of these activities. A facility administration charge is additional to the fee or brokerage that Willis Towers Watson Group of Companies receives for placement and other services to clients. We will disclose any such charges to you.

These facilities typically apply to straightforward, small business lines or specialist product areas, for example, commercial combined, motor, personal lines, personal accident and terrorism.

The type of business written in these facilities tends to be high-volume, low-premium business that would not be viable for insurers to write individually on the open market. By grouping this business together, clients enjoy the benefits of a broad product, suited to their needs and the cost savings of collective buying power.

In a very limited number of cases a portion of our remuneration may be driven by the underwriting profitability of the facility. There is a potential for us to earn such “profit commissions”, but, because this business is grouped together, it is not possible to determine the extent to which the profitability of a book is affected by any single client.

## CONTACT US

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This FSG is also available on our website:  
[www.willistowerswatson.com/en-AU](http://www.willistowerswatson.com/en-AU)

### About Willis Towers Watson

Willis Towers Watson (NASDAQ: WLTW) is a leading global advisory, broking and solutions company that helps clients around the world turn risk into a path for growth. With roots dating to 1828, Willis Towers Watson has over 45,000 employees serving more than 140 countries.

We design and deliver solutions that manage risk, optimise benefits, cultivate talent, and expand the power of capital to protect and strengthen institutions and individuals. Our unique perspective allows us to see the critical intersections between talent, assets and ideas – the dynamic formula that drives business performance. Together, we unlock potential.

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