

# Complaints Procedures

October 2019

## Section 1 : General

At Willis, we provide a professional service to our clients in satisfying their requirements. However, complaints or mistakes inevitably arise and, as part of our professional and quality approach, we have procedures in place to handle complaints promptly, fairly and consistently.

Communication and transparency with the client is vital. Many complaints, errors and omissions situations are created or could have been avoided by communicating openly and promptly with clients when there is apparent bad news. Often this news is not as bad as it first seemed and communication gives us the opportunity of showing the client a positive approach. When communicating with your client, always be aware who your client is on a particular task. You may owe duties to a number of parties, e.g. other intermediaries, co-insureds, loss payees, clients' lenders and to insurers where reinsurance is placed.

Our procedures also aim to:

- help our Associates to understand how they should react when we receive a complaint;
- enable us to benefit under our errors and omissions policy should a financial loss occur;
- help management to identify and manage our errors, which we can rectify to avoid reoccurrence and

improve our best practices; and

- satisfy our regulatory obligations.

Finally, it is policy that any instance that is identified as a potential error & omission i.e. a claim or circumstance likely to give rise to a claim must be immediately referred to International Legal Department, whether or not also reported as a complaint.

Willis has identified Ryck Genis as the Complaints Officer and single point of contact for any complaints.

Ryck Genis  
PO Box 55509, Northlands, 2116  
Tel: (021) 681 3700  
Fax: (021) 7616677  
E-mail address: ryck.genis@willistowerswatson.com  
Website: www.willistowerswatson.com

## Section 2: Procedures

### 2.1 Definition of a Complaint

The definition of a complaint is:

“**Complaint**” means an expression of dissatisfaction by a person to a provider or, to the knowledge of the provider, to the provider’s service supplier relating to a financial product or financial service provided or offered by that provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that -

- a. the provider or its service supplier has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the provider or to which it subscribes;
- b. the provider or its service supplier’s maladministration or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or
- c. the provider or its service supplier has treated the person unfairly;

Always be sure that your client is in fact making a complaint as defined above before implementing the complaints procedures. Ensure also that any complaint is not likely to be subject to a statutory time bar i.e. a legal time limit in which you have to bring a claim. If there is any doubt as to whether a remark or communication amounts to a complaint, you should seek advice from your line manager or Complaints Officer responsible for complaint handling in the office about whether it should be notified as such. Although the response to a complaint, unless it is notifiable as an E&O circumstance, is not required to be cleared by the International Legal Department, assistance is available from them in formulating that response. Alternatively, contact the Willis International Compliance Director.

Complaints received from the markets or third parties about Willis service should also be addressed in accordance with these procedures.

Also note the Willis Policy on Abusive / Threatening Telephone Calls which is available on the Willis intranet. Such calls may contain a genuine complaint, which should be identified and handled in accordance with prescribed procedures. These should be referred to your manager.

### 2.2 Complaints from “eligible complainants” - Private Clients, Small Businesses, Charities and Trusts

Certain complaints by clients may require special attention, as, in some countries, they may have the right to refer a complaint to an External Regulator (see 2.3).

The Financial Advisory and Intermediary Services, (FAIS) Act, the Act, defines a complaint as “a specific complaint relating to a financial service rendered by a financial service provider or representative to the complainant<sup>1</sup> on or after the commencement of this Act, and in which complaint it is alleged that the provider or representative-

- (i) has contravened or failed to comply with a provision of this Act and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage;
- (ii) has wilfully or negligently rendered a financial service to the complainant which has caused prejudice or damage; or
- (iii) has treated the complainant unfairly;

The types of complaints that can be referred to the Ombud appointed in terms of Section 26 of the Act must satisfy the following criteria:

- (i) the complaint must fall within the ambit of the Act and Rules on Proceedings of the office of the Ombud for Financial Services Providers, 2003;
- (ii) the person against whom the complaint is made must be an authorised financial services provider (hereafter referred to as “the respondent”);
- (iii) the act or omission complained of must have occurred after August 2003; and
- (iv) the respondent must have failed to address the complaint satisfactorily within six weeks of its receipt.

An ombudsman has been established to assist short-term insurance consumers with resolution of disputes relating to personal or commercial short-term insurance. Although the focus is on short-term insurers, the Office can, at its discretion, mediate on matters between short-term insurance brokers and consumers.

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<sup>1</sup> A complainant includes the complainant’s lawful successor in title or a person nominated as beneficiary in terms of the financial product which is the subject of the relevant complaint

This office is recognised in terms of the Financial Services Ombud Schemes Act.

## 2.3 Procedures – Complaints

All complaints to be handled in accordance with the procedures herein and notified to the Complaints Officer responsible for complaint handling in the office as well as the Compliance Officer

### Introduction

- A complaints database has been developed to assist in addressing the key elements in our procedures. The creation of an entry in the database for each complaint is mandatory and is the responsibility of the associate nominated to be responsible for handling the complaint. The database constitutes the company's complaints register. See Appendix A for input format.
- The names of any associates related to a complaint should be kept confidential. Advice should be sought from the International Compliance Director and / or International Legal Department.
- If a complaint received is alleging misconduct by any associate it should immediately be referred to the International Compliance Director and Group Compliance.

### Receipt of a complaint

- On receipt of a complaint we must make certain that its nature is fully understood. If not, we must make further enquiries. If the complaint is about (re)insurer's product or service we must determine whether we will respond or pass it to the (re)insurer (see below). All complaints must be referred to the Complaints Officer responsible for complaint handling in the office.
- In the case of complaints which involve more than one business unit or Willis Office, it is the responsibility of the area receiving first notification of the complaint to deal with first acknowledgement. Thereafter, responsibility for handling the complaint is to be determined between line managements and or the Complaints Officers of the areas concerned, or if across different countries, the International Compliance Director.
- All complaints will be addressed to seek the relevant objectives. Every complaint will be allocated according to its type e.g. claims, sales, admin, finance, etc (18.3.1 (a) of the PPRs

- The FSP will establish if the complaint is in relation to a claim, service, advice, administration or any other, after which a full investigation will be conducted. (Rule 18.2.1.(b) and (c) of the PPRs)
- All types of complaints, whether oral or written are to be treated equally and dealt with accordingly. (Rule 18.2.1.(e))
- The Complaints Officer may appoint a competent associate, who is not directly involved with the subject matter, to be responsible for the resolution of each complaint notified. The associate appointed must have authority to settle the complaint and to offer fair compensation or redress or have ready access to someone who has such authority. In the event that such compensation or redress is over £500 (or local equivalent), prior approval must be pre-approved by the International Compliance Director, or if notified to the International Legal Department, by them. Any compensation or redress must be accepted by the complainant before the complaint is signed off as completed. (Note: In some cases redress for a complaint may be limited to an apology.)

### Complaints which may be potential Errors & Omissions (E&Os)

- The Complaints Officer receiving the complaint will consider whether the complaint is to be referred to the International Legal Department as a potential Errors and Omissions circumstance and, if not, how the complaint is to be handled. If referred to the International Legal Department, it will determine whether the complaint is notifiable as an E&O circumstance.
- Where a complaint is referred to the International Legal Department as a potential Errors and Omissions circumstance, it is the responsibility of the office to ensure that the acknowledgement of the complaint and subsequent communications with the complainant required by these procedures (and your regulator) are sent within the timescales set down. The International Legal Department will assist with the drafting and approval of the wording of such communications. Failure by the International Legal Department to assist within the timescales required should be referred to the International Compliance Director.

### Handling / Acknowledgement of a complaint

- **The first key date is to acknowledge the complaint within 48-hours of receipt.** The acknowledgement

(see Appendix C) should advise how the complaint is being handled and by whom and, if available, details of the action to be taken and an indication of when the matter will be resolved

- When acknowledging an oral complaint we should provide the complainant with a written summary of the issues raised and advise the client that all further communication is to be in writing where a client is unable to receive written communication, at least a call should be utilised. In the event of an oral complaint being resolved immediately without any written acknowledgement being sent, a file note must be prepared and retained on the relevant file(s), setting out details of the complaint and how it was resolved.
- A complaint about the compensation Willis receives from (re)insurers is to be referred to Group Compliance and the International Compliance Director within 24 hours of receipt. The office must record the complaint in accordance with the procedures (see Appendix I) and acknowledge the complaint within five business days of receipt. Thereafter, Group Compliance will be responsible for the adherence to the process. The acknowledgement letter to be used is attached as Appendix B of the procedures.
- All complaints will be recorded on the complaints database and records must be kept in order to identify any systemic problems, training needs, etc. A format of the 24 hours Complaints Register is attached as part of the complaints procedures (see Appendix J). The Complaints Officer is responsible to ensure that the register is complete and accurate.
- The Complaints officer and the relevant department will investigate and respond to all types of complaints, where senior management is required it will be escalated based on the complexity of the complaints in order to achieve a fair outcome. (Rule 18,3.1 (c) and (d) )
- **In the event of the complaint not being resolved within four weeks** of receipt the complainant must be advised in writing of the reason for the delay and when he can expect a final response (see Appendix D).
- Our **FINAL RESPONSE**, (see Appendices F and G) which should be provided within six weeks of our receipt of the complaint, should either be to:
  - accept the complaint and offer compensation or redress, where appropriate and obtain confirmation from the complainant that the matter has been resolved to their satisfaction;

or

- reject the complaint with full reasons for doing so; and advise the complainant that they can refer the matter to the office of the FAIS Ombud and that the referral should be done within six months of the notification.

NB: No offer of financial redress should be made without the Managing Director's approval and without the sign-off by the International Legal Department where the International Legal Department is already involved. Where the financial redress is greater than the equivalent of £500, pre-approval of any offer must be gained from the International Compliance Director.

- Business unit line management will authorise any corrective action required and determine preventive measures to avoid re-occurrences. These measures are to be recorded on the complaints database together with the identity of the Associate(s) responsible for implementation.

#### **Complaints not resolved within six weeks**

- In the event of a complaint being unresolved within six weeks, the International Compliance Director must be advised, and the complainant must be notified, in writing (see Appendix E):
  - of the reasons for the further delay and advised when we will be able to provide a final response; and
  - in the cases of an eligible complainant, of his right to refer the matter to the External Regulator;
- The International Compliance Director will work with the office(s) concerned to ensure effective resolution of all complaints unresolved within six weeks, by complainants not eligible for reference to an External Regulator, in consultation with the International Legal Department as necessary. He or she will also deal with internal corrective action in liaison with the affected office(s).

#### **Closure of a complaint**

- The Compliance Officer responsible within each office for complaint handling will sign-off the closure of a complaint once satisfied it has been successfully resolved. A complaint can be closed after the final

response was sent to the complainant.

- If a complainant refers the matter to the Willis Group Compliance Directors or External Regulator, Group Compliance will take responsibility.

### Responding on behalf of an (re)insurer

- If we are to respond to a complaint about an (re) insurer's product or service we should follow the above procedures, in all respects, but agree any remedy with the (re)insurer before offering it to the complainant. Where an External Regulator or other dispute resolution body becomes involved, the (re)insurer should be informed.

### Complaints received by Willis about a Third Party product or service

- In the event we receive a complaint about a third party product or service (e.g. insurer or reinsurer) it must be referred to the third party in writing within 5 business days of receipt. We should inform the complainant of the referral by way of a final response (see Appendix H) and include the third party's contact details.
- The office can enter the details of the complaint in the complaints database, clarifying the fact that the complaint was not about our service by selecting the category "Complaints about a Third Party Service" in the Complaints Category drop-down box.

## 2.4 Definition of E&O

An Error or Omission claim is:

"A claim or circumstances likely to give rise to a claim made by a third party arising out of a breach of duty by Willis in performing its services agreed expressly or customary in the market."

## 2.5 Procedures – Errors and Omissions

All notifications should be written and contain a description of the problem with relevant dates and an estimate of the quantum involved. They should be addressed to the International Legal Department, with a copy also being sent to the International Compliance Director. All notifications must be signed off by the senior management of the area concerned. Please note in these circumstances care must be taken not to create internal communications (including email) as such communications are likely to be disclosable to the client and their lawyers at a later stage.

Where a complaint is referred to the International Legal Department as an Errors and Omissions incident, it is the responsibility of the office to ensure that the acknowledgement of the complaint and subsequent communications with the complainant required by these procedures are sent. The International Legal Department must approve the wording of such communications.

If a letter or similar notification is received indicating that the matter must be resolved (within a certain time frame) or dire consequences will result, a letter from the office's Managing Director should be sent in response. This letter should merely acknowledge receipt of the complainant's correspondence and indicate that it has been forwarded to the International Legal Department for further review and response. Correspondence should not be entered into regarding any errors and omissions circumstance, nor should any papers or files be released without the express authorisation of the International Legal Department.

**Liability:** This aspect of the claim should not be discussed with the claimant (to do so could prejudice Willis). No loss commitment or admission of liability must be made without the approval of the International Legal Department.

No services of an external lawyer are to be retained nor expense to be incurred without prior consultation and with the approval of the International Legal Department.

**Lawsuits:** In all cases where a Willis company is being sued or is or has been named a party defendant in any litigation, a copy of the claim form (writ) or equivalent must be immediately forwarded to the International Legal Department, informing of the date and time it has been received by Willis.

## Section 3: Monitoring, Reporting and Recording

- The Complaints Officer responsible for complaint handling in the office will report regularly to the Managing Director, Compliance Officer and International Compliance Director the circumstances and conclusions of all complaints, including preventive action to be taken.
- The Managing Director will review the complaints reported to identify systemic problems. Changes in procedures and practice necessary to correct such problems will be implemented. A record of reviews and changes implemented will be maintained by the Compliance Officer.
- Each office will maintain information of the subject matter of all complaints, which will be recorded on the

Willis International Complaints Database (see 2.3). A consolidated report will be provided monthly to the International Compliance Director.

- Records of complaints will be retained indefinitely

Records of complaints should include the fully completed entry in the Complaints Database and correspondence with the complainant, including details of any compensation or redress.

- Details of open errors and omissions notifications will be reviewed by the International Compliance Director on a monthly basis for lessons to be learned and the need to implement. Changes in procedures and practice that are necessary to correct such problems will be implemented.
- Details of E&O circumstances and complaints and lessons to be learned will be shared with other business areas, as part of our policy to improve best practice. Names and offices will be removed so that no individual is embarrassed by such sharing.
- Complaints statistics are reported to the relevant governance committees as prescribed by Rule 18.3.1 (e)

#### **Section 4: Allocation or responsibilities**

- This complaints management framework/policy must be approved by the board of directors and be reviewed annually. (Rule 18.4.1)
- The complaints officer has the adequate training to handle complaints, and knowledge of the business across board. (Rule 18.4.2)
- The Complaints officer will all times act objectively and independently to avoid conflicts of interest.

#### **Section 5: Categorisations of Complaints**

- All complaints will be categorised according to type of complaint, whether claims, sales, advice, service, premiums, etc. in order to provide proper reporting to our insurers. (Rule 18.5) (also refer to your appendix A under point 12).

## Appendix A: Willis International Complaints Database Entry Format

	I.D.	Automatically numbers each record when created
1	Client*	Client's personal name or business name to be entered. If confidentiality issues exist, please enter policy number instead.
2	Complainant*	Complainant's name to be entered.
3	Is this an individual client acting in his/her private capacity?*	Use the drop down box to select Yes or No.
4	Class of Business*	Select which category of business applies.
5	Business Unit (Country)*	Not applicable if countries are listed on home page
6	Branch/Business area	Insert Branch and/or Business Area
7	Status*	Enter if complaint is New or Re-Opened.
8	Date received*	This box will automatically default today's date, but will allow changes if needed, by clicking on the calendar beside the box. The system will not allow a future date to be entered.
9	Date acknowledged*	Enter the date a letter acknowledging receipt of complaint was sent to complainant.
10	Has the complaint been acknowledged within 5 business days of receipt?	This field will be automatically answered Yes or No, by calculating the number of days elapsed between the date the complaint was received and the date the acknowledgment letter was sent.
11	Associate Responsible for Addressing Complaint	Enter the associate responsible for addressing the complaint.
12	Complaints Category*	Use the drop down box to select the complaints category pertinent to the complaint. If more than one category applies select the most appropriate one to the complaint.
13	Details of Complaint*	Enter the details of the complaint in the space provided. N.B. Facts and details of complaints allegations only. No views to be expressed by Willis.
14	Date Willis final response sent to Complainant	Enter the date Willis final response was sent to Complainant
15	Was the Complaint accepted by Willis?	Enter Yes, No or In Part
16	Date Complainant acknowledged Willis final response	Enter the date the complainant acknowledged the complaint was satisfactorily resolved.
17	Has the complaint been resolved within 4 weeks of receipt?	This field will be filled in automatically with a Yes or No, by calculating the number of days elapsed between the date the final response was sent and the date the complaint was received.
18	If complaint not resolved within 4 weeks, enter date Complainant was advised of delay reasons.	The Complainant needs to be advised in writing at 4 weeks of the reason(s) for the delay and when a final response can be expected. Enter the date the letter was sent.
19	Has the complaint been resolved within 6 weeks of receipt?	This field will be filled in automatically with a Yes or No, by calculating the number of days elapsed between the date the final response was sent and the date the complaint was received.
20	If complaint not resolved within 6 weeks, enter date complainant was advised of delay reasons and any rights to complain to an external regulator.	The Complainant needs to be advised in writing at 6 weeks of the reason(s) for the delay when a final response can be expected and remind them of any rights to complain to an external regulator if applicable. Enter the date the letter was sent

	I.D.	Automatically numbers each record when created
21	Was complaint referred by complainant to an external regulator?	Answer yes if the eligible complainant referred their complaint to the external regulator when they received our final response or 6 weeks after they sent their complaint to us.
22	If yes, please include the date the complaint was referred to the regulator.	Please include the date the complainant referred the complaint to the external regulator or the date the external regulator notified us of their involvement on the complaint.
23	Has the complaint been notified as an Error and Omission claim or circumstance?	Enter Yes or No using the drop down box if the complaint has been notified as an Error and Omission claim or circumstance. N.B. Only enter Yes if the International Legal Department agrees.
24	When was the International Legal Department advised? (If applicable)	If the International Legal Department was advised, please enter the date they were advised.
25	Is the International Legal Department continuing to handle / advise on the complaint?	Enter Yes or No using the drop down box, if the International Legal Department is involved in handling or advising on the complaint.
26	Date complainant acknowledged Willis final response.	Please enter a date or click the calendar icon and simply select one.
27	Has the complaint been closed?	A complaint can only be closed when our final response has been sent to the client / complainant. Only a designated associate can close a complaint.
28	Date complaint closed?	Please enter a date or click the calendar icon and simply select one.
29	Outcome	Enter the details of the complaints outcome in the space provided - this should incorporate what was done to rectify the complaint. If the complaint is ongoing enter updates on the complaint progress. If the complaint is also notified as an E&O circumstance, please ensure International Legal Department agrees all updates in advance.
30	Amount paid in redress (if applicable)	Only enter the amount at the conclusion of the complaint only. Redress is defined as any amount paid, where a cash value can be readily identified, and would include: (i) Amounts paid for distress and inconvenience, (ii) Provision of a fee transfer out to another provider that would normally be paid for, (iii) Ex-gratia payments and goodwill gestures, (iv) Interest on delay settlements, (v) waiver of an excess on an insurance policy, and (vi) Payments to put the consumer back into position they had been in had the act or omission did not occurred.
31	If payment made, please include the date the redress was paid to the complainant.	Please include the date the redress was paid to the complainant. Please consider the date that the check was issued as the date paid.
32	Was the complaint accepted by Willis South Africa?	Enter Yes or No
33	Client lost?	Enter Yes or No
34	Follow-up action	Enter details of corrective actions taken to minimise future occurrences of complaint.

## Appendix B: Standard Acknowledgment Template Letter for Complaints related to Insurer's Compensation

***To be issued by the Complaints Officer or Managing Director responsible for complaint handling in the office, within five business days of receipt of a complaint***

Dear (insert name),

I / We acknowledge receipt of your letter / email / telephone call / visit of [date] in which you complained about the compensation we recovered from [name of the insurer] in respect of the insurance we place for you with the insurer i.e. [insert details of the policy].

I / We write to advise that our Group Compliance Department will handle your complaint and any further communications concerning the subject matter of your complaint should be addressed to the Group Compliance Director, Willis Group Limited, Ten Trinity Square, London, EC3P 3AX in writing.

I / We attach for your information a summary of our complaints procedures. The procedures outlined in this summary should ensure investigation and satisfactory resolution of your complaint within an appropriate timescale.

If you have any questions or concerns, please do not hesitate to contact me.

Yours sincerely,

Name of Associate  
Position

## Appendix C: Standard Acknowledgment Template Letter

***To be issued by the Complaints Officer or Managing Director responsible for complaint handling in the office, within five business days of receipt of a complaint***

Dear (insert name),

I / We acknowledge receipt of your letter / email / telephone call / visit of [date] in which you complained about

(Insert subject of complaint. If an oral complaint by telephone or in person include a short summary of our understanding of the complaint. Please also include details of individuals, both complainant / Willis).

I / We write to advise that (insert name of associate investigating), has been appointed to handle your complaint. Please address any further communications concerning the subject matter of your complaint to him / her in writing. For your information "Name of Associate investigating the complaint" can be contacted at: XXXXX.

I / We attach for your information a summary of our complaints procedures. The procedures outlined in this summary should ensure investigation and satisfactory resolution of your complaint within an appropriate timescale.

If you have any questions or concerns, please do not hesitate to contact me.

Yours sincerely,

Name of Associate  
Position

## Appendix D: “Fourth Week” Letter Template

*To be issued by the Complaints Officer if a final response was not sent to the client within four weeks of the complaint being received. It is a Group requirement to keep the client informed and explain (i) the reasons for the delay in sending the final response and (ii) when the final response can be expected.*

**Where the complaint is also an E&O notification, all communications must be approved by the International Legal Department.**

“Without Prejudice”

Dear (insert name)

As you are aware, I have been appointed to handle your complaint notified on (DD/MM/YY).

I have not yet been able to complete my review because (insert reason) but expect to do so by (insert date), when I shall contact you further.

If you have any questions regarding the handling of your complaint, please do not hesitate to contact me.

Yours sincerely,

Name of the Associate  
Position

**NB, If you are in a position to send the final response please refer to the final response template letter.**

## Appendix E: “Sixth Week” Letter Template

*To be issued by the Complaints Officer if a final response was not sent to the client within six weeks of the complaint being received. It is a Group requirement to keep the client informed and explain (i) the reasons for the delay in sending the final response, (ii) when the final response can be expected and (iii) remind them of their referral rights.*

**Where the complaint is also an E&O notification, all communications must be approved by the International Legal Department.**

“Without Prejudice”

Dear (insert name),

As you are aware, I have been appointed to handle your complaint notified on (DD/MM/YY).

I am now writing to advise that

### **1. For Eligible Complainants:**

I have still not been able to complete my review because (insert reason). I shall however continue my review with a view to concluding the matter by (insert date), when I shall contact you further.

I must now remind you that if you are dissatisfied with the handling of this complaint you have the right to refer it to the Ombud for Financial Service Providers for adjudication. Should you take this option, I confirm that Willis Group Limited will cooperate fully so that your complaint can be resolved satisfactorily.

Please find enclosed information on the complaints handling process at the FAIS Ombud. The FAIS Ombud can be contacted as per the details below:

FAIS Ombud  
PO Box 74571  
Lynwood Ridge  
0040

Telephone: +27 12 470 9080  
Facsimile: +27 12 348 3447  
E-mail address: info@faisombud.co.za  
Website: www.faisombud.co.za

### **2. For Non-Eligible Complainant:**

I have still not been able to complete my review because (insert reason). I shall however continue with my review with a view to concluding by (insert date), when I shall contact you further.

I must now remind you that if you are dissatisfied with the handling of this complaint you have the right to refer it to the Willis International Chief Compliance Officer who will handle this matter, with a view to reaching a mutually satisfactory conclusion.

For your information the Willis International Compliance Director's contact details are as follows: Niamh Grogan

Willis International Chief Compliance Officer  
Level 11, The Willis Building  
51 Lime Street London, EC3M 7DQ  
E-mail: Niamh.Grogan@willistowerswatson.com

If you have any questions or concerns, please do not hesitate to contact me.

Yours sincerely,

Name of Associate  
Position

## Appendix F: “Final Response” Letter Template

*To be issued by the associate responsible for handling a complaint ideally no later than six weeks after first notification of a complaint.*

*It is a regulatory responsibility to keep the client informed of the process if we are unable to send our final response letter within six weeks of the complaint being received. Two letters must be sent; one at four weeks and the other one at six weeks of the complaint being received (please see four and six weeks template letters).*

**Where the complaint is also an E&O notification, all communications must be approved by the International Legal Department.**

“Without Prejudice”

Dear (insert name),

As you are aware, I have been appointed to handle your complaint notified on (DD/MM/YY).

I have now investigated the circumstances and am writing to advise that

**1. Accept the complaint and offer redress if applicable**

I have found your complaint to be justified. On behalf of Willis, I offer a full apology and confirm that we are taking the following action to prevent a recurrence (insert details).

Add if appropriate, As a result of this error on our part, we offer £xxx by way of compensation representing (insert detail)\*\*.

OR

**2. Reject the complaint and explain reasons why**

I have found your complaint to be not justified. The reasons of or conclusion are (insert reasons)

Please confirm that this matter has been concluded to your satisfaction and (if appropriate) that you accept the compensation which we have offered. NB, if a financial compensation is offered a “simple release template letter” must be duly completed and send to the complainant.

## **Mandatory Referral Rights Paragraph**

**[Insert text in accordance with your local Regulatory position]**

***The following paragraph must be inserted, and it will vary if the client is or is not an FOS “Eligible Complainant”.***

### **For Eligible Complainants:**

If you are dissatisfied with our final response you have the right to refer your complaint to the FAIS Ombud for Financial Services Providers for adjudication. Should you take this option, Willis confirms that it will cooperate fully so that your complaint can be resolved satisfactorily.

In terms of the FAIS Act, a complainant is afforded the following rights:

- (a) You must qualify<sup>1</sup> to lodge complaint as such in terms of the Act and the Rules on the Proceedings of the Office of the Ombud for Financial Services Providers
- (b) Before submitting a complaint to the Office, the you must endeavour to resolve the matter with the respondent
- (c) You have six months after receipt of the final response from Willis, or after such response was due, to submit a complaint to the Office.
- (d) You must satisfy the Ombud of having endeavoured to resolve the matter with Willis before submitting your complaint to the Office and must produce Willis’ final response (if any) as well as your reasons for disagreeing with the final response.
- (e) Your complaint must be submitted in writing or, in circumstances deemed appropriate, the complaint may be submitted in any other manner which conveys the complaint in comprehensible form.
- (f) Your complaint where necessary, must be accompanied by available documentation in your possession.
- (g) You will be advised by the Ombud of Willis’ response to the extent necessary for you to respond and to decide whether the complaint should be proceeded with, and must advise the Ombud of your decision within two weeks.
- (h) You are entitled submit further facts, information or documentation in connection with the complaint, and must do so, to the extent possible, if so requested by the Ombud.

The FAIS Ombud can be contacted as per the details below:

FAIS Ombud  
PO Box 74571  
Lynwood Ridge  
0040

Telephone: +27 12 470 9080  
Facsimile: +27 12 348 3447  
E-mail address: [info@faisombud.co.za](mailto:info@faisombud.co.za) Website: [www.faisombud.co.za](http://www.faisombud.co.za)

Telephone: +27 12 470 9080  
Facsimile: +27 12 762 5000  
E-mail address: [info@faisombud.co.za](mailto:info@faisombud.co.za) Website: [www.faisombud.co.za](http://www.faisombud.co.za)

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<sup>1</sup> A complainant includes the complainant’s lawful successor in title or a person nominated as beneficiary in terms of the financial product which is the subject of the relevant complaint

Willis has the following rights and duties:

- (a) Where a complaint cannot be addressed within three weeks, Willis must as soon as reasonably possible after receipt of the complaint from the complainant send the complainant a written acknowledgement of the complaint with contact references of the respondent.
- (b) If within six weeks of receipt of the complaint Willis is unable to resolve the complaint to the satisfaction of the complainant, Willis must inform the complainant that-
  - (i) The complaint may be referred to the Office if the complainant wishes to pursue the matter; and
  - (ii) The complainant should do so within six months of receipt of such notification.
- (c) Willis must be informed of the complaint submitted to the Office to the extent necessary to respond thereto fully.
- (d) Willis is entitled to submit any fact, information or documentation in relation to the complaint and must disclose relevant information or documentation to the Ombud.
- (e) If deemed necessary by the Ombud, Willis may discuss the complaint with the Ombud and furnish further relevant information as the Ombud may require.

Willis is required to act professionally and reasonably and to cooperate with a view to ensuring the efficient resolution of the complaint

**For Non-Eligible Complainants:**

If you are dissatisfied with our final response you have the right to refer your complaint to the Willis International Compliance Director.

For your information our International Compliance Director's contact details are as follows:

Claire Powell  
Willis International Compliance Director  
Level 11, The Willis Building 51 Lime Street  
London, EC3M 7DQ  
e-mail: [claire.powell@willis.com](mailto:claire.powell@willis.com) Tel: +44 20 31247325

If you have any questions or concerns, please do not hesitate to contact me.

Yours sincerely,

Name of Associate  
Position

**\*\* No offer of financial redress should be made without the office Managing Director's approval and without the sign-off by International Legal Department where the International Legal Department is already involved. Where the financial redress is greater than £500, pre-approval of the offer must be obtained by the International Compliance Director.**

## Appendix G: Simple Release Letter Template Related to Redress Offers

*To be issued by the associate responsible for handling the complaint, together with the final response when we offer a financial redress to the complainant.*

**Where the complaint is also an E&O notification, all communications must be approved by the International Legal Department.**

“Without Prejudice”

Dear Sirs,

We confirm that in consideration of paying you the sum of £XXX, you will, by endorsing this letter, release Willis on a full and final basis in relation to the circumstances relating to the complaint you raised in your letter(s) of [date] addressed to [Willis associate name] of Willis.

Please indicate your agreement by endorsing this letter below and we will arrange for a cheque to be sent to you by return.

Yours faithfully,

XXXX

Willis

We hereby agree to the terms set out above.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name

## Appendix H: “Referral” Template Letter

***It is a Group requirement to refer a complaint received about a third party product or service to the relevant entity within 5 business days of receipt. The complainant should be informed of the referral in writing by way of a final response ensuring we include the relevant entity’s contact details.***

“Without Prejudice”

Name of Complainant

Address 1

Address 2

Address 3

Today's date

Dear (insert name of complainant),

**Re: Your letter of (insert date of complainant's letter)**

We acknowledge receipt of your letter dated (insert date of complainant’s letter) where you complain about (insert details of the complaint).

We confirm that the product/service you are complaining about has not been provided by Willis. The product / service you are complaining about was provided by (insert name of the entity that provided the product / service the client is complaining about).

Willis cannot therefore deal with your complaint, but we will send a copy of your letter to (insert name of the entity that provided the product / service the client is complaining about) who will contact you directly.

Our information is that you should write to the Managing Director of (insert name of the entity who provided the product / service the client is complaining about) at the following address:

Address 1

Address 2

Address 3

Address 4

**Tel: Insert telephone number of the entity of whom the client is complaining**

**Fax: Insert fax number of the entity of whom the client is complaining**

We are sorry we cannot be of further assistance to you at this time and hope that you will find the above information of help to you.

Yours sincerely,

Name of Associate

Position

## Appendix I: 24 Hours Complaint Record

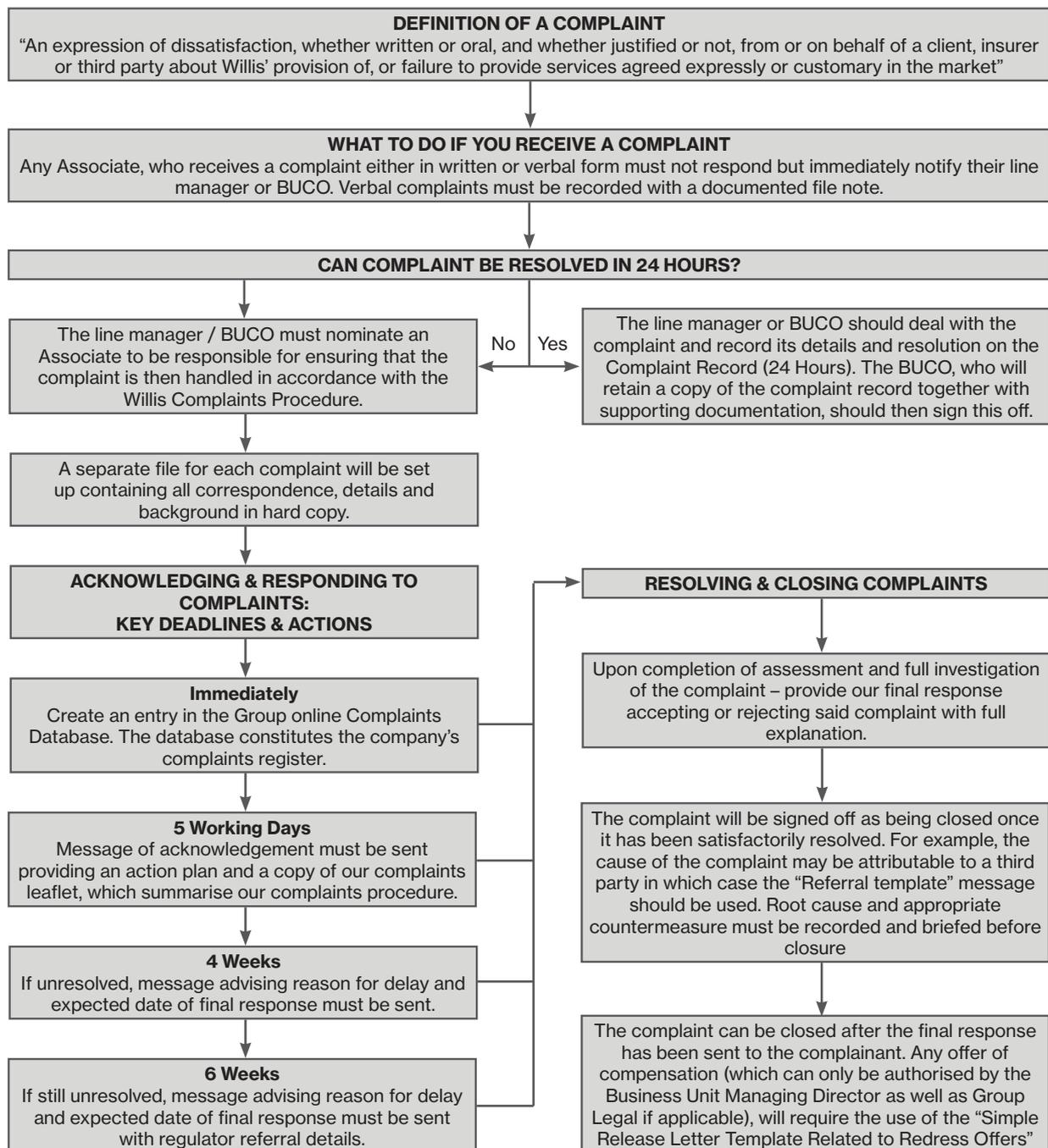
<b>Willis 24 Hour Complaint Record</b>			
<b>Client:</b>			
<b>Complaint:</b>			
<b>Is the client:</b>	<b>An individual?</b> <input type="checkbox"/>	<b>A small business?</b> <input type="checkbox"/>	
<b>Business Unit:</b>		<b>Sub BU:</b>	
<b>Business Area:</b>		<b>Class of Business:</b>	
<b>Date Complaint:</b>	<b>Received:</b> <input type="checkbox"/>	<b>Resolved:</b> <input type="checkbox"/>	
<b>Reported to:</b>			
<b>Name of the Associate who addressed / resolved the complaint:</b>			
<b>Details of Complaint (copy correspondence attached)</b>			
<b>Complaint Officer Advised:</b>		<b>Date:</b>	
<b>Outcome (details of how the complaint was resolved)</b>			
<b>Required Corrective Action (if applicable)</b>			
<b>Signed off as Satisfactorily Resolved:</b>			
<b>Date:</b>			
<hr style="width: 80%; margin: 0 auto;"/> <b>Compliance Officer</b>			



## Appendix K: Summary of Complaints Handling Procedure

(A summary of the Group's Complaints Procedures guidance is accessible from the Compliance Library on the Group Compliance website accessed via the "Group" tab on "Good Morning Willis")

\* Denotes - please refer to the above Complaints Procedures for full guidance, Complaint Record form, how to access the Group online Complaints Database and various pro forma correspondence templates.



## 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 45,000 employees serving more than 140 countries and markets. We design and deliver solutions that manage risk, optimize 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. Learn more at [willistowerswatson.com](http://willistowerswatson.com).

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