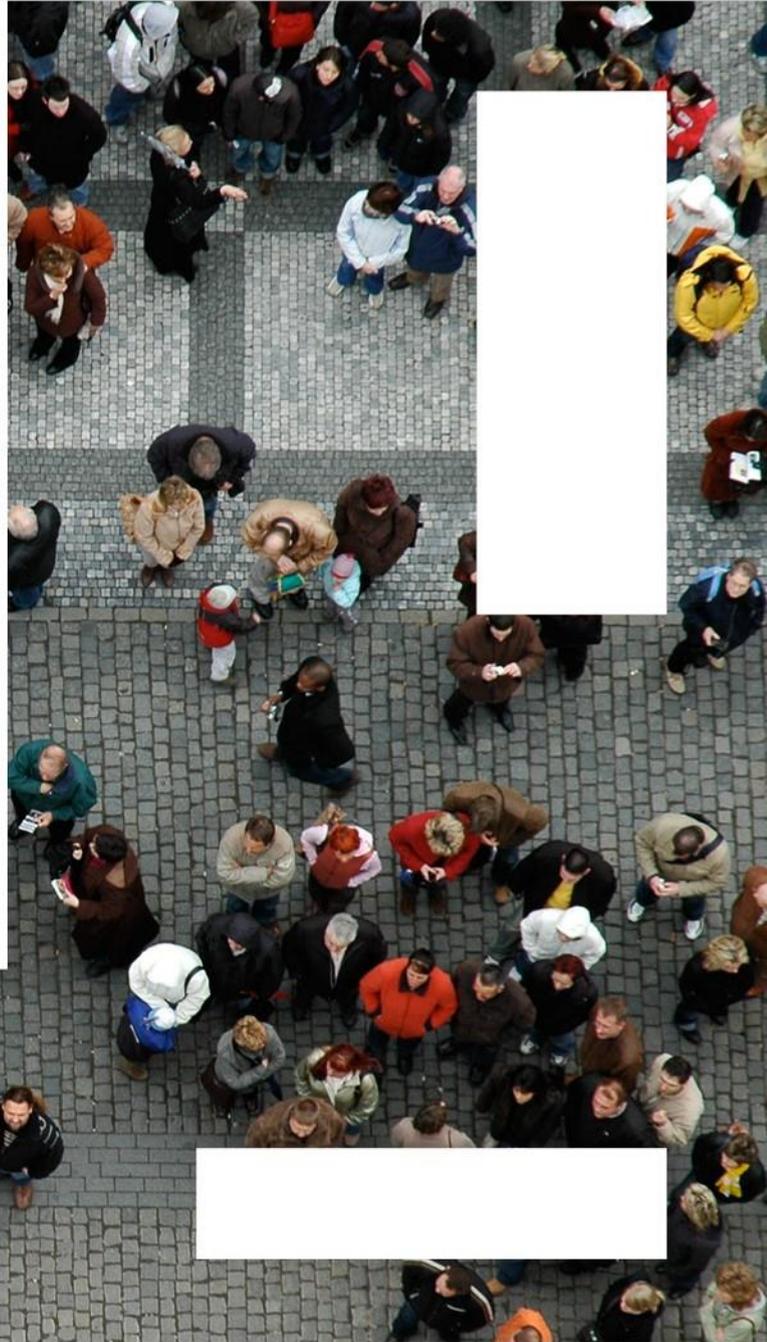


Willis Re  
Complaints Procedures

**Compliance**

(See Scope for Willis Re entities procedures relate to)

June 2021



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# 1 OVERVIEW

## 1.1 Scope

The [Willis Re Complaints Procedures](#) ('Procedures') apply to all Willis Re entities ('Willis Re') where specifically listed in the table below. Willis Re entities that have their own specific guidelines and regulatory procedures will need to be referred to separately:

Countries Applicable to these <a href="#">Procedures</a> (Collectively referred to as 'Willis Re' within the Procedures)	Countries With Separate Specific Procedures
Willis Hong Kong Limited	<a href="#">Willis Limited (UK including DIFC)</a>
Willis Re Labuan Limited	<a href="#">Willis Re Iberia (Spain)</a>
Willis (Singapore) Pte. Ltd.	<a href="#">Willis Re Southern Europe SpA (Italy)</a>
Willis Corredores de Reaseguros Limitada (Brazil)	<a href="#">Willis Re GmbH (Germany)</a>
Willis Corredores de Reaseguros SA (Argentina)	<a href="#">Willis Re Nordic AS (to be released Q1 2020)</a>
Willis Mexico Intermediario de Reaseguro S.A. de C.V	<a href="#">Willis Re S.A. (France)</a>
Willis Re Bermuda Limited	<a href="#">Willis Re (Proprietary) Limited (South Africa)</a>
Willis (Taiwan) Limited	<a href="#">PT Willis Reinsurance Brokers Indonesia</a>
Willis Re Netherlands	<a href="#">Willis Re Australia Limited</a>
Willis Re Inc. (USA)	<a href="#">Willis Re Japan KK</a>
Willis Re Canada Inc	
Willis Re Netherlands	

## 1.2 Definition

Willis Re defines a complaint as:

*“Any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a client about the provision of, or failure to provide, a financial service.”*

If you can't decide whether something is a complaint or not, please get in touch with your designated [Complaints Handler](#) (or ROA's in North America) or your Willis Re Compliance Business Partner 'Compliance' and discuss it with them.

These Procedures define how complaints received from Willis Re Clients and/or Client Representatives should be handled.

Colleagues should be aware that the term 'dissatisfaction' can cover a wide range of situations. All expressions of dissatisfaction should be referred to the [Complaints Handler/ROA](#), even if the colleague considers that the issue has been resolved during the same phone call or email interaction in which it was raised. If there is any doubt as to whether something should be treated as a complaint colleagues should refer to a [Complaints Handler/ROA](#) or Compliance.

## 2 INTRODUCTION

These procedures describe in detail the steps to be taken whenever Willis Re receives a complaint from a customer. All colleagues need to be familiar with the definition of a complaint and the fact that ALL customer complaints must be referred immediately to a [Complaints Handler/ROA](#) to be logged on the [Willis Complaints Database](#) (Database).

All Willis Towers Watson colleagues have a responsibility to be familiar with their applicable complaints procedure documents and all colleagues will be offered complaints training appropriate to their role.

There is a suite of accompanying materials, including template letters, available within the [Complaints Folder](#) held in the L Drive. [Complaints Handlers](#) are responsible for selecting the most appropriate template.

### 2.1 Purpose of Complaints Handling

Listening to our customers' concerns and responding appropriately is a key part of treating our customers fairly. Complaints are a valuable source of feedback and issues identified through complaints can lead to improvements in the way we do things.

### 2.2 Complaints Handlers

It is the Business Unit's responsibility to allocate this role to individuals who have appropriate skills and experience and to ensure that they have sufficient time and resources to perform the role competently and in a timely manner.

The [Complaints Handler](#) will be responsible for:

- Deciding whether a complaint has been resolved by the end of the fifth business day or whether it needs to be taken down the more formal route for resolution;
- Establishing whether the complaint is in fact related to Willis Re or another Willis Towers Watson entity and ensuring the complaint is passed on swiftly;
- Logging the complaint on the [Database](#);

- Investigating and responding to the complaint;
- Acting impartially as the Business Unit subject expert on complaints; and
- Assisting Compliance to conduct root cause analysis and, where appropriate, making recommendations to the business as a result of that analysis.

In order to ensure that complaints are investigated impartially, [Complaints Handlers](#) must not investigate complaints which are wholly or partially about their own actions, the actions of their immediate direct reports or, in respect of placement and advice complaints, where they are one of the primary points of contact for the complainant and have an on-going business relationship with them. In such circumstances, the complaint must be allocated to another [Complaints Handler](#).

Where [Complaints Handlers](#) have been only tangentially or superficially involved in the circumstances giving rise to a complaint they may continue to investigate it but should consider carefully whether it would be more appropriate for another [Complaints Handler](#) to conduct the investigation. They should consult with Compliance if they are in any doubt as to the appropriateness of continuing.

## 2.3 Willis Re Complaints Handling Principles

Willis Re's guiding principles in handling complaints are:

- That the complainant should be listened to and receive an appropriate response;
- Not to make assumptions but to reach conclusions based on evidence;
- To investigate complaints competently, diligently and impartially; and
- To act with integrity at all times.

## 2.4 Informal Complaints – Fifth Business Day Resolution

For the purposes of these Procedures, recordable complaints are those received from our Clients (e.g. the Reinsured). It does not normally include consultants, loss adjusters, carriers /markets or other intermediaries, unless they are complaining on behalf of a customer.

Some complaints may be resolved immediately, and where this is possible it is not necessary to issue any formal complaint letters. All complaints must still be notified to [Complaints Handlers](#) and logged on the [Database](#).

Complaints from Willis Re Clients may only be resolved informally and classified as such if they are remediated by close of the fifth business day.

## 2.5 Formally Acknowledging a Complaint

Customer complaints which are not resolved informally (by the fifth business day) must be acknowledged formally at this point. The acknowledgement serves to tell the complainant that the complaint has been received by Willis Re, is being dealt with and to provide them with a single point of contact for the complaint.

The appropriate Complaint Acknowledgement template letter should be used and a scanned PDF copy should be attached to the [Database](#).

Complaints must also be logged on the [Database](#) within five days of receipt unless additional instructions have been received by Compliance.

## 2.6 Keeping the Complainant Updated – Formal Complaints

The Procedures include the requirement to ensure that progress updates are sent at least every four weeks and more frequently if appropriate. Each update communication should give an indication of when the [Complaints Handler](#) expects to be able to provide the Final Response.

Where the [Complaints Handler](#) has asked another colleague to supply further information this should be chased every two weeks, unless the other party has already indicated it will take longer than this.

## 2.7 Final Response

The Final Response should cover all the material aspects of the complaint, refer to evidence as appropriate and should be written in plain language without the use of jargon or acronyms. [Complaints Handlers](#) should use the appropriate Final Response template from the [Complaints Folder](#).

## 2.8 Internal Complaints

In a situation where a complaint is from one Willis Re office about another Willis Re office or from another Willis Re entity against Willis Re, this should not be recorded as a complaint so long as the complaint is not originating from a Willis Re Client e.g. another Willis Towers Watson or Willis Re colleague is complaining about another colleague with no reference to a Client; these would be regarded as internal issues. However, if the Willis Re/Willis Towers Watson office raising the complaint is doing so on behalf of a Client then this will need to be recorded as a complaint in the usual way.

If there is any indication, evidenced or not, that the complaint is from an underlying Client, then the usual complaints process should be followed and logged within 5 days of receipt unless Compliance advise otherwise.

## 3 ERRORS & OMISSIONS, REDRESS AND CLOSURE

### 3.1 Errors & Omissions

An Errors or Omissions (“E&O”) situation is something which results in:

- (a) A claim against Willis Re;
- (b) A notice of intention to claim against Willis Re; or
- (c) Circumstances that may give rise to a claim against Willis Re.

Where the matter complained about has the potential to fit this E&O definition, or where there is any reference to taking legal action against Willis Re, the [Complaints Handler](#) must contact their Business Unit’s Legal representative as soon as possibly phone and in line with E&O guidance.

Where a complaint is also logged as a potential E&O Legal should be involved at all stages and no admission of liability should be made without their agreement.

### 3.2 Offers of Redress

If the investigation has shown that Willis Re was at fault in some way, any offer of settlement or redress should aim to put the complainant into the position they would have been in if Willis Re had not been at fault. This may involve financial redress, but it may also involve putting things right in some other way.

Where the [Complaints Handler](#) concludes that the complaint resolution should include making a financial offer to the complainant, they must ensure that appropriate Business Unit management approval is given along with agreement from Legal. All offers of financial settlement should either use the standard template release form from the [Complaints Folder](#) or, where appropriate, an alternative drafted by Legal.

Where Willis Re makes a financial payment in settlement of a complaint, this may take several forms:

- 3.2.1 Financial redress – where Willis Re admits that it made an error and has calculated the value of putting the complainant in the position they should have been in;
- 3.2.2 Where appropriate, an award to take into account the reasonable expenses incurred by the complainant in pursuing the complaint;
- 3.2.3 And Distress and Inconvenience award (“D&I”) – this is additional compensation, sometimes on top of a financial redress calculation, which is intended to take account of any distress or inconvenience suffered by the complainant.

### 3.3 Closing the Complaint

The complaint should be closed on the [Database](#) once a final response has been issued. If the complainant subsequently asks for it to be referred to the Willis Re Compliance Director it should be reopened.

The complaint should be closed on the Database once a final response has been issued. This is the responsibility of the Complaints Handler who must ensure all aspects of this procedure have been complied with and the complaint records is complete. If the complainant subsequently asks for it to be referred to the FOS, it should be reopened.

## 4 ADDITIONAL COMPLAINTS

### 4.1 Complaints against a Non-Willis Towers Watson Entity

If the complaint is from a Client and about an external entity, e.g. an intermediary broker, market/carrier, it should be referred to the other firm for them to review. Willis Re should also ensure adequate investigation is made to confirm that no fault lies with Willis Re actions and these complaints will still need to be logged on the [Database](#) as Third Party Complaints.

It is good practice, when in receipt of a complaint about a third party, that Willis Re:

- Refers the complaint in writing to the other firm

Where both Willis Re and any other party are jointly responsible for the matter complained about we should forward those aspects which are the responsibility of the other firm and also deal with the aspects for which Willis Re is responsible in line with our Procedures.

### 4.2 Complaints forwarded to Willis Re

If another firm forwards a complaint to Willis Re that complaint must be treated in the same way as if the complaint was received directly from the Client/Client representative.

## 5 DATABASE & ROOT CAUSE ANALYSIS

### 5.1 Database

All complaints, including those resolved informally, are required to be logged on the [Database](#). The purpose of this is to keep a central log of all complaints received by Willis Re, as well as to allow trends to be analysed.

[Complaints Handlers](#) will be expected to attend a training session on the [Database](#) and root cause analysis.

### 5.2 Root Cause Analysis

The [Complaint Handler](#) is responsible for assessing the root cause of the complaint using the drop-down menu and for suggesting appropriate countermeasures. Compliance is responsible for assessing whether there are any wider or systemic root causes as well as providing assistance and support when required.

## 6 APPENDIX

### Template Letters

#### Formal 5 Day Acknowledgement Letter Template



5 Day  
Acknowledgement L

#### 4-Week Update Letter Template



4 Week Update  
Letter.docx

#### 8-Week Update Letter Template



8 Week Update  
Letter.docx

#### Final Response Letter Template



Final Response  
Letter.docx

## Version Control

Version & Date	Notes	Author	Approver
<b>1.0 Oct 2019</b>	First draft of new Willis Re Procedures	Alicia Caley	Scott Randall, Willis Re Compliance Director
<b>2.0 Jan 2020</b>	Final version of new Willis Re Procedures for distribution	Alicia Caley	Scott Randall, Willis Re Compliance Director
<b>3.0 June 2021</b>	Amendment to Closure of Complaints section as responsibility lies with Complaints Handler	Alicia Caley	Scott Randall Willis Re Compliance Director

## 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 39,000 employees in more than 120 countries. 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).