

The background features a large purple rectangle on the left and bottom. On the right, there are three overlapping rectangular blocks with diagonal line patterns: a teal block at the top, a purple block below it, and a blue block at the bottom right. A white rectangular box is positioned in the lower-left area, containing the title and company information.

Complaints Handling Policy & Procedures

Willis South Africa (Pty) Ltd

2024

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1. Purpose of this document

Willis South Africa (Pty) Ltd (Willis SA) is an authorised Financial Services Provider, and as such we have certain specific duties towards you – our valued client. One of these duties is the establishment of a formal complaint management and resolution framework, which will enable you to exercise your rights as provided for in the Financial Advisory and Intermediary Services Act (FAIS).

The purpose of this document is to inform you of the procedure which will be followed to provide a resolution for the complaint which you have submitted. The section below sets out the specific requirements of the legislation that governs complaints.

2. Context – why we need to have the complaints procedure in place

In terms of section 16 of the General Code of Conduct, a “**reportable complaint**” means any complaint **other than a complaint that has been** -

- (a) upheld immediately by the person who initially received the complaint;
- (b) upheld within the provider’s ordinary processes for handling client queries in relation to the type of financial product or financial service complained about, provided that such process does not take more than **five business days** from the date the complaint is received; or
- (c) submitted to or brought to the attention of the provider in such a manner that the provider does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints;

So, it follows that, where a complaint cannot be resolved within 5 business days, it must be recorded in the Willis SA complaints register and then the complaints procedure as set out in Section 5 of this procedure document must be followed -

- Part XI the General Code of Conduct for Authorised Financial Services Providers and Representatives (“the General Code of Conduct”) stipulates the complaints management requirements which an FSP must comply with.
- In terms of section 17(8)(e) of the General Code of Conduct, a provider must disclose to the client –
 - The type of information required from a complainant;
 - Where, how and to whom a complaint and related information must be submitted;
 - Expected turnaround times in relation to complaints; and
 - Any other relevant responsibilities of a complainant.
- Section 17(8)(f) of the General Code of Conduct stipulates that a provider must within a reasonable time after receipt of a complaint acknowledge receipt thereof and promptly inform a complainant of the process to be followed in handling the complaint, including –
 - Contact details of the person or department that will be handling the complaint;
 - Indicative and, where applicable, prescribed timelines for addressing the complaint;

- Details of the internal complaints escalation and review process if the complainant is not satisfied with the outcome of the complaint;
- Details of escalation of complaints to the office of a relevant Ombud and any applicable timeline; and
- Details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant Ombud.

3. Scope

This policy and procedures apply to all Willis SA Colleagues. This document must be provided to a complainant within **1 (one) working day** as soon as Willis SA receives a complaint from same (whether written or not).

4. Definition of complaint

In terms of the FAIS Act, a “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 –

- 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;
- 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
- The provider or its service supplier has treated the person unfairly.

The financial services environment is complex. We will endeavour to address all reasonable requests from our clients, but may also refer you to a more appropriate facility.

In instances where the complaint relates to any matter that is not within our control, such as product information, we will forward the complaint to the product supplier concerned.

5. Complaints Procedure

The time periods set out in this procedure will be adhered to as strictly as possible but may be varied where necessary. Our internal complaints resolution process sets out the procedures we will adopt and demonstrates how a complaint will be dealt with, once received by us -

- Your complaint and all communications in connection with your complaint must be in writing. All verbal communications made in connection with the complaint must be confirmed in writing within **3 (three) working days** of the communication.

- Please indicate the following information:
 - Your name, surname and contact details;
 - A complete description of your complaint and the date on which the financial service which led to your complaint was rendered;
 - The name of the person who furnished the financial advice or rendered the intermediary service that led to your complaint; and
 - How you would prefer to receive future communications regarding your complaint (i.e. via fax or e-mail).

- Ryck Genis is the Complaints Officer and the single point of contact for any complaints as per the details below:

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

- The complaint will be entered into our Complaints Register on the same day that it is made and written confirmation of receipt will be forwarded to you. We will keep record of the complaint and maintain such record for **5 (five) years** as required by legislation.
- The complaint will immediately be brought to the attention of the senior manager in charge of the relevant department for allocation to a trained and skilled person who is able to properly respond to your complaint.
- The complaint will be investigated, and we will revert to you with our preliminary findings within **7 (seven) working days** from the date of receipt of the complaint. We will advise you if circumstances require us to take a longer period to complete this initial assessment. In all instances we will advise you of the reasons for our decisions.

The preliminary findings will be discussed with all internal parties concerned, and a proposed solution will be communicated to you within a further **7 (seven) working days**. In all instances we will advise you of the reasons for our decisions. Again, we will keep you fully apprised should we require additional time to devise a bespoke resolution to resolve your cause for complaint.

- If you are not satisfied with our solution, you may refer the complaint to the CEO, who is also the Willis SA Key Individual (KI). The CEO may amend the solution or confirm it. Please be informed that certain decisions may have to be approved by the Executive Leadership Team of Willis SA. In such a case we will communicate that fact to you, as well as the date on which a decision relating to your complaint will be taken.
- If, after having referred the complaint to the CEO, you are still not satisfied with the outcome, we will regard the complaint as being unsatisfactorily resolved. In such a case, you may approach the office of the Ombud for Financial Services Providers or take such other steps as may be advised by your legal representatives.

- The Ombud is appointed by the Financial Services Conduct Authority (the “FSCA”) to act as an adjudicator in disputes between clients and financial services providers. The referral to the offices of the Ombud must be done in accordance with the provisions of section 27 of the Financial Advisory and Intermediary Services Act 2002 and the rules promulgated in terms of that section.
- In instances where we have not been able to arrive at a resolution within **6 (six) weeks** after you have submitted your complaint, you may refer the matter to the Ombud. The Ombud acts independently and objectively and has jurisdiction in respect of complaints relating to advice or intermediary services, which has arisen after 15 November 2002.
- You must, if you wish to refer the matter to the Ombud, do so within **6 (six) months** from the date of the notice in which we inform you that we are unable to resolve your complaint to your satisfaction. The Ombud will not adjudicate in matters exceeding a value of R800 000.
- The FAIS Ombud – Adv. John Simpson – may be contacted at his offices in Pretoria at the following address:

Physical Address:

125 Dallas Avenue
Menlyn Central
Waterkloof Glen
Pretoria
0010

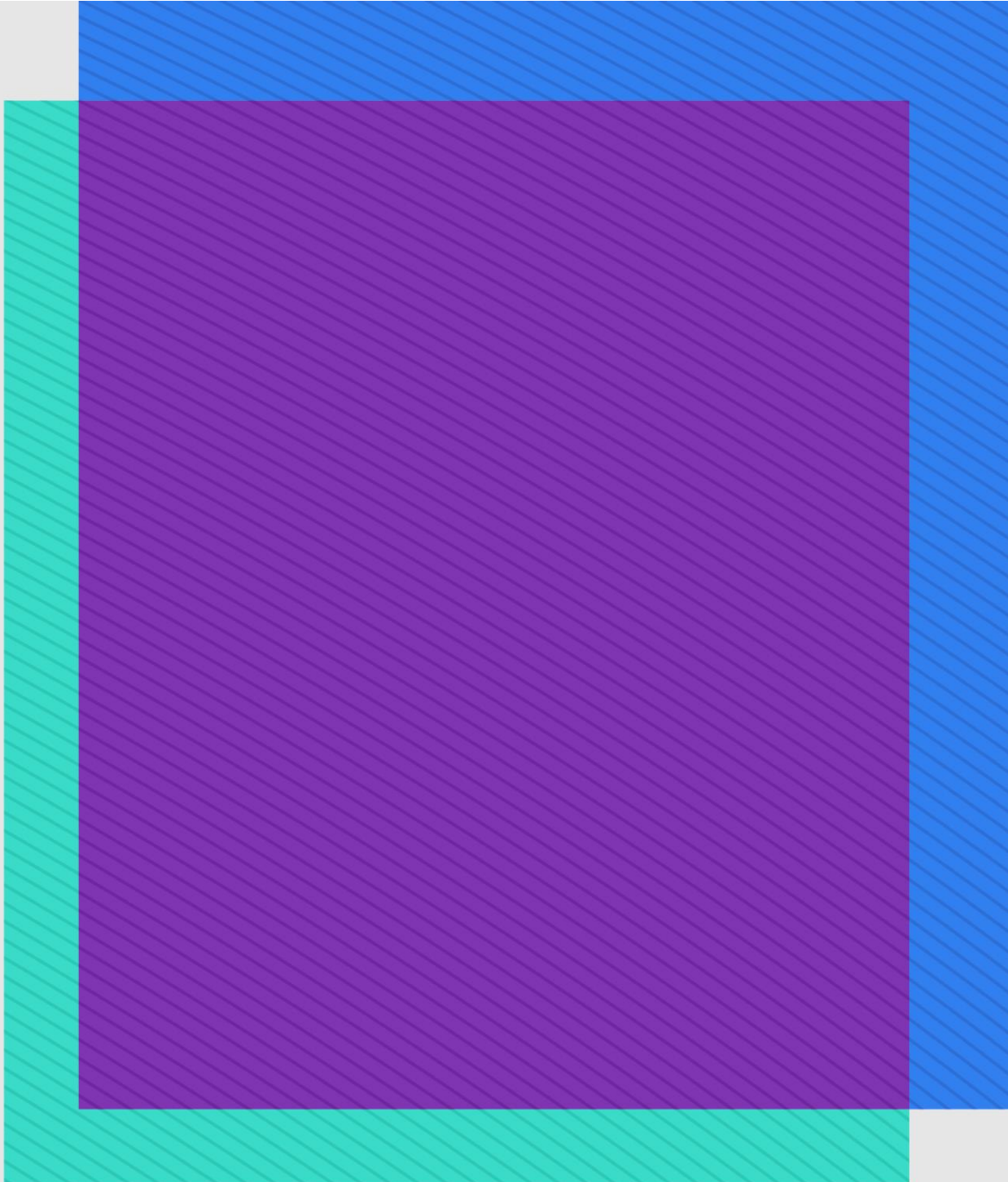
Telephone: +27 12 762 5000 / +27 12 470 9080
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Postal Address:

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Menlyn Park
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E-mail Address: info@faisombud.co.za
Website: www.faisombud.co.za

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About WTW

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Willis South Africa (Pty) Limited is an authorised financial Services Provider: FSP267
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