

THE WILLIS CLIENT BILL OF RIGHTS

Our Client Bill of Rights is our commitment to upholding the highest standards of integrity in our industry and how we deliver the Willis Value Experience.

At Willis, our culture and our actions are guided by the following principles:

1. Willis represents the client's best interests through our client advocacy model. Willis' global resources and services are committed to understanding the client's company, its industry and its individual needs. Willis' customized recommendations and solutions will be driven by what is in the client's best interests. This is the centerpiece of the value Willis provides its clients.
2. At the commencement of every new engagement and at renewal thereafter, Willis will describe the service and value it provides and how it is compensated for it – in plain and simple language – as part of our Terms of Business Agreements, Fee Agreements, Standard Terms and Conditions, and our Willis Client Service Model.
3. Willis will listen before it acts. Its partnerships with clients will be typified by clear, complete and candid communication.
4. Clients will have a toll free number to give Willis feedback on the quality of its services. Clients can comment, critique and suggest areas for improvement. Willis values client input.
5. Willis will require that the training its Associates receive includes enhanced emphasis on their duty of care and full disclosure to clients.
6. Willis Associates are prohibited from accepting any gifts, entertainment or trips from insurers that could create the appearance of a conflict of interest with its clients.
7. Willis will not accept contingency compensation from insurers.*
8. Willis will conduct its business in accordance with its best practices guidelines, which are incorporated in our Willis Excellence Model.
9. Willis clients will receive the benefits of our *glocal* approach to service: our global resources delivered locally to help clients realize their highest risk management and business objectives regardless of geography.
10. Adherence to these principles will be enforced by a series of enhanced internal controls, including regular compliance reviews, audits and review by the Audit Committee of the Willis Board of Directors..

Willis toll-free number: 1 866 704 5115

**Despite Willis' objections, many insurance carriers have imposed volume-based compensation in certain parts of the US employee benefits business. To continue to serve its clients in this business, Willis has no viable option but to accept this compensation, which it fully discloses, in medical lines only. Contingent commission agreements that Willis inherited with the acquisition of HRH expire in 2011. Willis may accept contingent compensation when it serves as an intermediary to another insurance producer.*

The Willis logo is displayed in a dark blue, serif font. The letters are bold and closely spaced. The logo is centered within a white rectangular area that is part of a larger yellow and white graphic element at the bottom of the page.