

1. As soon as any JLTPCS staff becomes aware of a complaint, immediate notice must be given to the Compliance Officer and the COO.
2. Once the complaint has been escalated to the Compliance Officer and the COO, JLTPCS staff involved in the complaint should cease all communication with the bank, banker and client.
3. New complaints which shall be looked into promptly and the complainant shall be informed that the complaint is being looked into, i.e. whenever possible by the next business day and always within two (2) business days.

JLTPCS Compliance Officer shall investigate the complaint in accordance with the following process and reply to the complainant within ten (10) business days of the receipt of the complaint:

- obtain comprehensive details of the complaint;
  - investigate the circumstances; and
  - formulate, implement and record any necessary corrective action.
  - set out to the complainant the action proposed and/or taken and where appropriate, a request that JLTPCS be advised if the outcome is not satisfactory;
4. Where the investigation of a complaint cannot be completed within 10 business days, a reply shall be sent to the complainant, explaining the reason for the delay and informing the complainant of an indicative reasonable timeframe for a response. If JLTPCS subsequently cannot reply within the timeframe communicated to the complainant, JLTPCS must write to the complainant again.

The COO must be notified of any investigation which cannot be completed within 20 working days.

5. JLTPCS is required to monitor and review all complaints to address any trends identified.
6. Following the investigation, the JLTPCS Compliance Officer is to discuss details and background of the case with the officer involved in the case and report such discussions and finding to the CEO, Group COO and/or Group CEO.
7. If the matter is capable of being resolved with the client and does not involve a potential financial liability, the JLTPCS Compliance Officer shall inform the CEO, Group COO and/or Group CEO of such steps as may be necessary to have the matter satisfactorily resolved.
8. If the matter becomes a compliance violation and the reporting to the regulators is required, the Board of Directors must be informed.
9. If the matter has the potential of resulting in financial obligation on the part of the Company, the matter must be reported to the CEO, Group COO and/or Group CEO, and where appropriate, JLT Group Legal. The JLTPCS Compliance Officer would then be guided by such direction and advice as may be provided by Senior Management.
10. At the conclusion of an incident, an entry to the Complaint Log must be made to indicate the date on which the matter has been resolved.

11. If an incident has escalated to litigation or a review by the regulatory authority, there must always be involvement by the Senior Management.
12. The Complaint shall be notified to the next Board Meeting and Asia Audit Risk Committee Meeting.