

The Background

Pursuant to provision 4.58A of the Central Bank of Ireland's September 2019 Addendum to the Consumer Protection Code, all intermediaries, must make available in their public offices, or on their website if they have one, a summary of the details of all arrangements for any fee, commission, other reward or remuneration provided to the intermediary which it has agreed with its product producers.

What is commission?

For the purpose of this document, commission is the payment earned by the intermediary for work undertaken on behalf of both the provider and the consumer. The amount of commission is generally directly related to the quantity or value of the products sold.

We are remunerated by commission and other payments from product producers. When assessing products, we will consider the different approach taken by product providers in terms of them integrating sustainability risks into their product offering. This will form part of our analysis for choosing a product provider.

Our Brokerage commission options are displayed as a range, showing the maximum amount which can be received. The level of commission depends on individual circumstances, based on the following factors:

The factors that may impact a variation in charges include;

- *Client segmentation*
- *Adviser discretion*
- *Competitive pressures*
- *Investment/pensions/saving size*
- *Schemes size*
- *Term/timeline of a policy or service*
- *Complexity of advice*
- *Preferential terms in the market, available to a Brokerage & client at the time*

There are different types of commission models:

Single commission model:	where payment is made to the intermediary shortly after the sale is completed and is based on a percentage of the premium paid/amount invested/amount borrowed.
Trail/Renewal commission model:	Further payments at intervals are paid throughout the life span of the product.
Indemnity commission	Indemnity commission is the term used to describe a commission payment made before the commission is deemed to be 'earned'. Indemnity commission may be subject to a clawback (see below) if the consumer lapses or cancels the product before the commission is deemed to be earned.

Other forms of indemnity commission are advances of commission for future sales granted to intermediaries in order to assist with set up costs or business development.

Life Assurance/Investments/Pension products

For Life Assurance products commission is divided into initial commission and renewal commission (related to premium), fund based or trail relating to accumulated fund.

Trail commission, bullet commission, fund based, or renewal commission are all terms used for ongoing payments. Where an investment fund is being built up through an insurance-based investment product or a pension product, the increments may be based on a percentage of the value of the fund or the annual premium. For a single premium/lump sum product, the increment is generally based on the value of the fund.

Examples of products include Life Protection, Regular Premium Life Assurance Investments, Single Premium (lump sum) Insurance-based Investments, and Single Premium Pensions.

Clawback

Clawback is an obligation on the intermediary to repay unearned commission. Commission can be paid directly after a contract is concluded but is not deemed to be 'earned' until after a specified period of time. If the consumer cancels or withdraws from the financial product within the specified time, the intermediary must return commission to the product producer.

Fees

The firm may also be remunerated by fee by the product producer such as policy fee, admin fee, or in the case of investment firms, advisory fees. Include arrangements etc

Please Note

The enclosed commission guidance section gives indicative values across every product provider and every product advised whereby a commission or fee is received within our business. This is the maximum our Brokerage will take and is subject to change, in certain cases our Brokerage may take a different remuneration than the enclosed percentages/amounts. This will be disclosed to each client as per the Central Bank Consumer Protection Code regulations, on a client-by-client basis.

Other Fees, Administrative Costs/ Non-Monetary Benefits

The firm may also be in receipt of non-monetary benefits such as:

- Attendance at product provider seminars
 - Assistance with Advertising/Branding
-

Further detail on the providers we work with, the products we sell and the maximum commissions available to us are outlined below.

Aviva Life & Pensions Ireland DAC

Term Life Protection

A Term Life Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Term Protection	150%	22%	24

Single Premium PRSA

Product	Initial %	Recurring %
Single Premium PRSA	4%	0.5%

Specified Illness

A Specified Illness Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Specified	150%	22%	24

Savings

The Savings contract typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual

premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to ‘clawback’ some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Savings	15%	1%	48

Personal Retirement Savings Account RP (PRSA)

A Personal Retirement Savings Account or PRSA typically provides for an Initial Commission as outlined below with certain restrictions around PRSA’s. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Regular Premium PRSA	22.5%	0.5%	48

Personal Retirement Bond (PRB)

The Pension Retirement Bond typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
PRB	5.25%	1%

Mortgage Protection

A Mortgage Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
---------	-----------	------------------------	--------------------------

Mortgage Protection	150%	22%	24
---------------------	------	-----	----

Income Protection

An Income Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Income Protection	200%	30%	48

Investment

An Investment Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
Investments	5.25%	1%

Defined Contribution Pension

A Defined Contribution Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Regular Premium pension	20%	1%	48
Single premium pension	5.25%	1%	–

Approved Retirement Fund (ARF) & Approved Minimum Retirement Fund (AMRF)

An ARF / AMRF Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
ARF	5.25%	1%

Irish Life Assurance plc

Whole of Life Protection

The Whole of Life Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Whole of Life	100%	28%	60

Term Life Protection

A Term Life Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Term Protection	160%	28%	60

Single Premium PRSA

Product	Initial %	Recurring %
---------	-----------	-------------

Single Premium PRSA	5%	0.75%
---------------------	----	-------

Specified Illness

A Specified Illness Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Specified	100%	28%	60

Savings

The Savings contract typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to ‘clawback’ some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Renewal	Clawback Period (Months)
Savings	5.5%	0.5%	5.5%	48

Personal Retirement Savings Account RP (PRSA)

A Personal Retirement Savings Account or PRSA typically provides for an Initial Commission as outlined below with certain restrictions around PRSA’s. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Renewal	Clawback Period (Months)
Regular Premium PRSA	17.5%	0.5%	5%	48

Personal Retirement Bond (PRB)

The Pension Retirement Bond typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
PRB	5%	0.75%

Mortgage Protection

A Mortgage Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Mortgage Protection	160%	28%	60

Income Protection

An Income Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Income Protection	120%	30%	60

Investment

An Investment Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
Investments	5%	0.5%

Defined Contribution Pension

A Defined Contribution Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Renewal	Clawback Period (Months)
Regular Premium pension	17.5%	0.5%	5%	48
Single premium pension	5%	0.75%	–	–

Approved Retirement Fund (ARF) & Approved Minimum Retirement Fund (AMRF)

An ARF / AMRF Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
ARF	5%	0.75%

New Ireland Assurance Company plc

Term Life Protection

A Term Life Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Term Protection	225%	50%	60

Single Premium PRSA

Product	Initial %	Recurring %	Clawback Period
---------	-----------	-------------	-----------------

Single Premium PRSA	10%	0.5%	60
---------------------	-----	------	----

Specified Illness

A Specified Illness Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Specified	225%	50%	60

Savings

The Savings contract typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to ‘clawback’ some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Renewal	Clawback Period (Months)
Savings	10%	0.5%	2.5%	60

Personal Retirement Savings Account RP (PRSA)

A Personal Retirement Savings Account or PRSA typically provides for an Initial Commission as outlined below with certain restrictions around PRSA’s. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Renewal	Clawback Period (Months)
Regular Premium PRSA	25%	0.5%	6%	60

Personal Retirement Bond (PRB)

The Pension Retirement Bond typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of

time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
PRB	5%	1%	60

Mortgage Protection

A Mortgage Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Mortgage Protection	225%	50%	60

Income Protection

An Income Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Income Protection	225%	50%	60

Investment

An Investment Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Investments	5%	1%	36
Regular Contribution Investment Policy	15%	0.5%	60
Regular Contribution PRSA	25%	0.5%	60

Regular Contribution Pensions	25%	1%	60
-------------------------------	-----	----	----

Defined Contribution Pension

A Defined Contribution Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Renewal	Clawback Period (Months)
Regular Premium pension	25%	1%	8%	60
Single premium pension	5%	1%	–	60

Approved Retirement Fund (ARF) & Approved Minimum Retirement Fund (AMRF)

An ARF / AMRF Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
ARF	5%	1%

Zurich Life Assurance plc

Whole of Life Protection

The Whole of Life Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Whole of Life	90%	18%	12

Term Life Protection

A Term Life Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Term Protection	180%	40%	12

Single Premium PRSA

Product	Initial %	Recurring %
Single Premium PRSA	5%	0.75%

Specified Illness

A Specified Illness Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Specified	100%	12%	12

Savings

The Savings contract typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to ‘clawback’ some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Renewal	Clawback Period (Months)
Savings	10%	0.5%	1%	48

Personal Retirement Savings Account RP (PRSA)

A Personal Retirement Savings Account or PRSA typically provides for an Initial Commission as outlined below with certain restrictions around PRSA's. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to "clawback" some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Renewal	Clawback Period (Months)
Regular Premium PRSA	30%	0.75%	5%	48

Personal Retirement Bond (PRB)

The Pension Retirement Bond typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to "clawback" some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
PRB	5%	0.5%

Mortgage Protection

A Mortgage Protection Product provides for an initial commission as outlined below. These policies have an inbuilt recurring commission structure to remunerate the Brokerage for reviews, service and claims support. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to "clawback" some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Clawback Period (Months)
Mortgage Protection	180%	40%	12

Investment

An Investment Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to "clawback" some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
---------	-----------	------------------------

Investment	5%	0.5%
------------	----	------

Defined Contribution Pension

A Defined Contribution Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %	Renewal	Clawback Period (Months)
Regular Premium pension	20%	0.5%	3%	48
Single premium pension	5.5%	0.5%	–	–

Approved Retirement Fund (ARF) & Approved Minimum Retirement Fund (AMRF)

An ARF / AMRF Product typically provides for an Initial Commission as outlined below. Brokerages may also agree with a client a recurring commission that may be based on a percentage of the value of the fund or the annual premium. If for some reason a client moves or terminates their policy within a particular period of time, this might result in the provider seeking to “clawback” some or all of the commission paid to the broker, depending on how long the policy was active with the provider.

Product	Initial %	Recurring Commission %
ARF	5%	0.5%