



Complete Financial
solutions

We, D & M Dempsey Financial Services Limited trading as Complete Financial Solutions, act as intermediary (Broker) between you, the consumer, and the product provider with whom we place your business.

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.

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.

General insurance products

General insurance products, such as motor, home, travel, health, retail or liability insurance, are typically subject to a single or standard commission model, based on the amount of premium charged for the insurance product.

Profit Share arrangements

In some cases, the intermediary may be a party to a profit-share arrangement with a product provider and will earn additional commission. Any business arranged with these product providers on a client's behalf will be placed with the product provider because that product provider is at the time of placement, the most suitable to meet the client's requirements, taking all the client's relevant information, demands and needs into account.

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.

Investments

Investment firms, which fall within the scope of the European Communities (Markets in Financial Instruments) Regulations 2007 (the MiFID Regulations), offer both standard commission and commission models involving initial and trail commission. Increments may be based on a percentage of the investment management fees, or on the value of the fund.

Credit Products/Mortgages

Commission may be earned by intermediaries for arranging credit for consumers, such as mortgages. The single, or standard, commission model is the most common commission model applied to the sale of mortgage products by mortgage credit intermediaries (Mortgage Broker).

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

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

See below for a list of the providers that our firm deals with, which for ease of reference is in alphabetical order.

Aviva Life & Pensions Ireland DAC

Term Life Protection

A Term Life Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Term Protection	150%	25%	100%	100%	-	-	-

Specified Illness

A Specified Illness Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Specified	150%	25%	100%	100%	-	-	-

Personal Retirement Savings Account

A Personal Retirement Savings Account or PRSA typically provides for an Initial (upfront) Commission as outlined below with certain restrictions around PRSA’s. Brokerages may also agree with a client to allow for a provide a Fund Based/Recurring commission/fee that’s based on the performance of the fund the client is invested in, again with certain restrictions. 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 %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
PRSA	22.5%	0.5%	2%	-	5%	3%	2%	1%

Personal Retirement Bond

The Pension Retirement Bond typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based commission/fee that’s based on the performance of the fund the client is invested in. 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 %	Trail %	Fund Based %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
PRB	5.25%	1%	-	-	5%	3%	2%	1%

Mortgage Protection

A Mortgage Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Mortgage Protection	150%	25%	100%	100%	-	-	-

Income Protection

An Income Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Income Protection	200%	10%	100%	100%	-	-	-

Investments

An Investment Product typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based/recurring commission/fee that’s based on the performance of the fund the client is invested in. 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 %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
Investments	5.25%	1%	-	-	5%	3%	2%	1%

Group Income Protection

Product	Initial €	Initial %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Group IP	-	6%	-	-	-	-	-	-	-	-

Broker Assist

Mortgage Switcher

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Switcher	0.8%	100%	50%	25%

Second and Subsequent Time Buyers

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Second/subsequent Buyer	0.8%	100%	50%	25%

First-Time Buyer

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - First-Time Buyer	0.8%	100%	66%	33%

Equity Release

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Equity Release	0.8%	100%	50%	25%

Dilosk DAC

Mortgage Switcher

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Switcher	1%	100%	50%	25%

Second and Subsequent Time Buyers

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Second/subsequent Buyer	1%	100%	50%	25%

First-Time Buyer

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - First-Time Buyer	1%	100%	50%	25%

Equity Release

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Equity Release	1%	100%	50%	25%

Finance Ireland

Mortgage Switcher

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Switcher	1%	100%	50%	25%

Second and Subsequent Time Buyers

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Second/subsequent Buyer	1%	100%	50%	25%

First-Time Buyer

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - First-Time Buyer	1%	100%	50%	25%

Equity Release

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Equity Release	1%	100%	50%	25%

Friends First

Personal Retirement Savings Account

A Personal Retirement Savings Account or PRSA typically provides for an Initial (upfront) Commission as outlined below with certain restrictions around PRSA's. Brokerages may also agree with a client to allow for a provide a Fund Based/Recurring commission/fee that's based on the performance of the fund the client is invested in, again with certain restrictions. 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 %	Trail %	Renewal %	Fund Based %	Clawbac k Yr. 1	Clawbac k Yr. 2	Clawbac k Yr. 3	Clawbac k Yr. 4
PRSA	17.5%	-	2.5%	0.25%	-	-	-	-

Personal Retirement Bond

The Pension Retirement Bond typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based commission/fee that's based on the performance of the fund the client is invested in. 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 %	Trail %	Fund Based %	Renewal %	Clawbac k Yr. 1	Clawbac k Yr. 2	Clawbac k Yr. 3	Clawbac k Yr. 4
PRB	4%	-	0.75%	-	-	-	-	-

Investments

An Investment Product typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based/recurring commission/fee that's based on the performance of the fund the client is invested in. 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 %	Trail %	Renewal %	Fund Based %	Clawbac k Yr. 1	Clawbac k Yr. 2	Clawbac k Yr. 3	Clawbac k Yr. 4
Investments	5%	0.75%	-	-	-	-	-	-

Haven

Mortgage Switcher

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Switcher	1%	100%	50%	25%

Second and Subsequent Time Buyers

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Second/subsequent Buyer	1%	100%	50%	25%

First-Time Buyer

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - First-Time Buyer	1%	100%	50%	25%

Equity Release

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Equity Release	1%	100%	50%	25%

Irish Life Assurance plc

Whole of Life Protection

The Whole of Life Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Whole of Life	100%	0.15%	100%	100%	100%	100%	100%

Term Life Protection

A Term Life Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Term Protection	100%	0.15%	100%	100%	100%	100%	100%

Specified Illness

A Specified Illness Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Specified	100%	0.15%	100%	100%	100%	100%	100%

Pension Term

Product	Initial €	Initial %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Pension Term	-	100%	-	15%	-	100%	100%	100%	100%	100%

Personal Retirement Savings Account

A Personal Retirement Savings Account or PRSA typically provides for an Initial (upfront) Commission as outlined below with certain restrictions around PRSA's. Brokerages may also agree with a client to allow for a provide a Fund Based/Recurring commission/fee that's based on the performance of the

fund the client is invested in, again with certain restrictions. 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 %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
PRSA	5%	-	-	1%	5%	3%	2%	1%

Personal Retirement Bond

The Pension Retirement Bond typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based commission/fee that’s based on the performance of the fund the client is invested in. 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 %	Trail %	Fund Based %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
PRB	5%	0.75%	-	-	5%	3%	2%	1%

Mortgage Protection

A Mortgage Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Mortgage Protection	100%	0.15%	100%	100%	100%	100%	100%

Income Protection

An Income Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Income Protection	120%	0.06%	100%	100%	-	-	-

Investments

An Investment Product typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based/recurring

commission/fee that's based on the performance of the fund the client is invested in. 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 %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
Investments	5%	-	-	0.75%	5%	3%	2%	1%

Group Income Protection

Product	Initial €	Initial %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Group IP	-	6%	-	-	-	-	-	-	-	-

KBC

Mortgage Switcher

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Switcher	1%	100%	50%	25%

Second and Subsequent Time Buyers

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Second/subsequent Buyer	1%	100%	50%	25%

First-Time Buyer

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - First-Time Buyer	1%	100%	50%	25%

Equity Release

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Equity Release	1%	100%	50%	25%

New Ireland Assurance Company plc

Term Life Protection

A Term Life Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Term Protection	225%	50%	100%	100%	-	-	-

Specified Illness

A Specified Illness Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Specified	225%	50%	100%	100%	-	-	-

Pension Term

Product	Initial €	Initial %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Pension Term	-	225%	-	50%	-	100%	100%	-	-	-

Personal Retirement Savings Account

A Personal Retirement Savings Account or PRSA typically provides for an Initial (upfront) Commission as outlined below with certain restrictions around PRSA's. Brokerages may also agree with a client to allow for a provide a Fund Based/Recurring commission/fee that's based on the performance of the fund the client is invested in, again with certain restrictions. 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 %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
PRSA	7%	0.5%	-	-	5%	5%	3%	1%

Personal Retirement Bond

The Pension Retirement Bond typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based commission/fee that’s based on the performance of the fund the client is invested in. 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 %	Trail %	Fund Based %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
PRB	5%	-	0.5%	-	5%	5%	3%	1%

Mortgage Protection

A Mortgage Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Mortgage Protection	225%	50%	100%	100%	-	-	-

Income Protection

An Income Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Income Protection	225%	50%	100%	100%	-	-	-

Investments

An Investment Product typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based/recurring commission/fee that’s based on the performance of the fund the client is invested in. 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 %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
Investments	10%	0.5%	2.5%	-	5%	3%	2%	1%

Group Income Protection

Product	Initial €	Initial %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Group IP	-	6%	-	-	-	-	-	-	-	-

PTSB

Mortgage Switcher

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Switcher	1%	100%	50%	25%

Second and Subsequent Time Buyers

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Second/subsequent Buyer	1%	100%	50%	25%

First-Time Buyer

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - First-Time Buyer	1%	100%	50%	25%

Equity Release

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Equity Release	1%	100%	50%	25%

Royal London Insurance DAC

Whole of Life Protection

The Whole of Life Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Whole of Life	200%	36%	100%	100%	100%	100%	100%

Term Life Protection

A Term Life Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Term Protection	200%	36%	100%	100%	100%	100%	100%

Specified Illness

A Specified Illness Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Specified	200%	36%	100%	100%	100%	100%	100%

Mortgage Protection

A Mortgage Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Mortgage Protection	200%	36%	100%	100%	100%	100%	100%

Income Protection

An Income Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Income Protection	200%	60%	100%	100%	100%	100%	100%

Seniors Money Mortgages (Ireland) DAC

Equity Release

Credit intermediation with respect to Mortgages allows for an initial once off upfront commission to remunerate a Brokerage based on the advice, service and packaging of a mortgage. If a client switches or ceases to pay a Mortgage repayment with the clawback period, the Brokerage will receive a pre agreed pro rata clawback within the below timeframes.

Product	Initial %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3
Mortgage - Equity Release	1%	100%	50%	25%

Zurich Life

Whole of Life Protection

The Whole of Life Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Whole of Life	90%	18%	100%	100%	-	-	-

Term Life Protection

A Term Life Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Term Protection	100%	12%	100%	100%	-	-	-

Specified Illness

A Specified Illness Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Specified	100%	12%	100%	100%	-	-	-

Pension Term

Product	Initial €	Initial %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Pension Term	-	100%	-	12%	-	100%	100%	-	-	-

Personal Retirement Savings Account

A Personal Retirement Savings Account or PRSA typically provides for an Initial (upfront) Commission as outlined below with certain restrictions around PRSA’s. Brokerages may also agree with a client to allow for a provide a Fund Based/Recurring commission/fee that’s based on the performance of the fund the client is invested in, again with certain restrictions. 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 %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
PRSA	15%	0.5%	5%	-	5%	5%	3%	1%

Personal Retirement Bond

The Pension Retirement Bond typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based commission/fee that's based on the performance of the fund the client is invested in. 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 %	Trail %	Fund Based %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
PRB	5%	0.5%	-	-	5%	5%	3%	1%

Mortgage Protection

A Mortgage Protection Product provides for an initial upfront 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 %	Renewal %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Mortgage Protection	140%	40%	100%	100%	-	-	-

Investments

An Investment Product typically provides for an Initial (upfront) Commission as outlined below. Brokerages may also agree with a client to allow for a provide a Fund Based/recurring commission/fee that's based on the performance of the fund the client is invested in. 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 %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4
Investments	5%	0.5%	0.5%	0.5%	-	-	-	-

Group Income Protection

Product	Initial €	Initial %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Group IP	-	6%	-	-	-	-	-	-	-	-

Cancer Cover

Product	Initial €	Initial %	Trail %	Renewal %	Fund Based %	Clawback Yr. 1	Clawback Yr. 2	Clawback Yr. 3	Clawback Yr. 4	Clawback Yr. 5
Cancer Cover	-	100%	-	12%	-	100%	100%	-	-	-

