

OUR REMUNERATION

We, Financial Equality Services Ltd, act as intermediary 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, remuneration is the payment earned by the intermediary for work undertaken on behalf of both the provider and the consumer. The amount of remuneration is generally directly related to the 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.

Details of Commission Range

Our firm's 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 firm's discretion
- Whether the level of commission is negotiable
- Client relationship
- Length / Term of the policy or contract
- Size of the investment
- Commercial decision
- Complexity of the case
- Product constraints / rules set by the product provider

There are different types of remuneration/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.

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, flat commission 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.

Life Assurance products fall into either individual or group protection policies and Investment/Pension products would be either single or regular contribution policies. 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

With regards to the fees that we charge, fees are charged on 'flat' basis or on a time spent and disbursements basis as well as on the level of expertise, the urgency and complexity involved. Should a fee apply we will advise you in writing in advance. In the event of you defaulting on any payment of fees, we will, if necessary, exercise our legal rights to recover such monies due.

Fees may be charged for advice given irrespective of whether a product is purchased by you.

If we receive a fee from a product provider, in some circumstances this fee may be offset against a fee we may charge you.

Preferred Provider Rate

Financial Equality Services Ltd do not have a preferred provider and therefore there is no arrangement of this type with any of the providers.

Other Fees, Administrative Costs/ Non-Monetary Benefits

The firm may also be in receipt of other fees, administrative costs, or non-monetary benefits such as:

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

Maximum Commission Rates

Single Contribution Products	Initial commission	Clawback Period	Trail commission
Single Contribution Pension			
Aviva	5%	N/A	1% p.a.
New Ireland	5%	N/A	0.5% p.a.
Royal London	N/A	N/A	N/A
Standard Life	5%	N/A	1% p.a.
Zurich Life	5.5%	N/A	0.5% p.a.
Single Contribution PRSA/PRB			
Aviva	5%	5 Years	1% p.a.
New Ireland	5%	5 Years	0.5% p.a.
Royal London	5%	5 Years	1% p.a.
Standard Life	5%	5 Years	0.5% p.a.
Zurich Life	5.5%	5 Years	0.5% p.a.
ARF / AMRF			
Aviva	5%	5 Years	1% p.a.
New Ireland	5%	5 Years	0.5% p.a.
Royal London	5%	5 Years	1% p.a.
Standard Life	4%	5 Years	1% p.a.
Zurich Life	5%	5 Years	0.5% p.a.
Annuity			
Aviva	2%	N/A	N/A
New Ireland	3%	N/A	N/A
Royal London	N/A	N/A	N/A
Standard Life	2%	N/A	N/A
Zurich Life	3%	N/A	N/A
Investment Bond			
Aviva	4%	5 Years	1% p.a.
BCP	2.25%	N/A	N/A
Broker Solutions	2.5%	N/A	N/A
Cantor Fitzgerald Ireland Ltd.	2.5%	N/A	N/A
Greenman Investments	2.5%	N/A	0.5% p.a.
New Ireland	4%	3 Years	0.5% p.a.
Standard Life	4%	N/A	1% p.a.
Zurich Life	5%	N/A	0.5% p.a.

Regular Contribution Products	Initial commission	Clawback Period	Renewal/ Flat Commission	Trail commission
Regular Contribution Pension				
Aviva	20%	4 Years	3%	1% p.a.
New Ireland	15%	5 Years	5%	0.5% p.a.
Royal London	N/A	N/A	N/A	N/A
Standard Life	25%	5 Years	5%	1% p.a.
Zurich Life	20%	4 Years	3%	0.5% p.a.
Regular Contribution PRSA				
Aviva	20%	5 Years	5%	0.75% p.a.
New Ireland	17.5%	N/A	5%	0.5% p.a.
Royal London	N/A	N/A	N/A	N/A
Standard Life	5%	N/A	5%	0.5% p.a.
Zurich Life	5%	4 Years	5%	0% p.a.
Savings				
Aviva	15%	4 Years	N/A	1% p.a.
New Ireland	10%	5 Years	N/A	0.5% p.a.
Royal London	N/A	N/A	N/A	N/A
Standard Life	15%	5 Years	N/A	1% p.a.
Zurich Life	10%	4 Years	1%	0.5% p.a.

Individual Protection	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9+	Clawback Period
Aviva	140%	3%	3%	3%	3%	3%	3%	3%	3%	2 Years
New Ireland	180%	12%	12%	12%	12%	12%	12%	12%	12%	5 Years
Royal London	22%	0%	0%	0%	0%	3%	3%	3%	3%	5 Years
Zurich Life	100%	12%	12%	12%	12%	12%	12%	12%	12%	1 Year

Group Protection	Death in Service	Clawback Period	Permanent Health Insurance	Clawback Period
Aviva	12%	1 Year	20%	4 Years
New Ireland	6%	N/A	12.5%	N/A
Royal London	N/A	N/A	N/A	N/A
Standard Life	6%	N/A	12.5%	N/A
Zurich Life	6%	N/A	12.5%	N/A

Mortgages	Commission	Clawback Period
All Lenders	1%	3 Years