

# **Our Charges**

We, Aidan MacSweeney, T/A AM Financial, 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.

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.

# 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 though 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

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

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 (Months)	Initial %	Recurring Commission	Recurring Commission %	
Specified	150%	22%	24	
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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 %		<b>Recurring Commission</b>	%	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	



### 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 Commission % Clawback Period (Months)

Mortgage - Switcher 1% 36

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 Commission % Clawback Period (Months)

Mortgage - First-Time Buyer 1% 36

# **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 Commission % Clawback Period (Months)

Mortgage - Equity Release 1% 36



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Mortgage Switcher

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Product Commission % Clawback Period (Months)

Mortgage - Switcher 1% 36

First-Time Buyer

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Product Commission % Clawback Period (Months)

Mortgage - First-Time Buyer 1% 36

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Product Commission % Clawback Period (Months)

Mortgage - Equity Release 1% 36



ICS/Dilosk

Mortgage Switcher

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Mortgage - Switcher 1% 36

First-Time Buyer

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Product Commission % Clawback Period (Months)

Mortgage - Equity Release 1% 36

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 %		<b>Recurring Commission</b>	%	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	100%	28%		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 100% 28% 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 %

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 100% 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

**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 Commission % Clawback Period (Months)

Mortgage - Switcher 1% 36

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 Commission % Clawback Period (Months)

Mortgage - First-Time Buyer 1% 36

**Equity Release** 

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Product Commission % Clawback Period (Months)

Mortgage - Equity Release 1% 36

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

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

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	oduct 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 %		<b>Recurring Commission</b>	%	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 %		<b>Recurring Commission</b>	%	Clawback Period
(Months)					
Income Protection	225%	50%		60	

PTSB



# Mortgage Switcher

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Product Commission % Clawback Period (Months)

Mortgage - Switcher 1% 36

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 Commission % Clawback Period (Months)

Mortgage - First-Time Buyer 1% 36

**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 Commission % Clawback Period (Months)

Mortgage - Equity Release 1% 36

Royal London Insurance DAC



# 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 %		<b>Recurring Commission</b>	%	Clawback Period
(Months)					
Whole of Life	200%	36%		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	200%	36%		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% 36% 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	200%	36%		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%	60%	60	

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 (Months)	Initial %		Recurring Commission	%	Clawback Period
Term Protection	170%	12%		12	

# **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 %		<b>Recurring Commission</b>	%	Clawback Period
(Months)					
Specified	100%	12%		12	

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 170% 40% 12