Terms of Business including Remuneration details and Schedule of Fees & Charges– Version 6.0 Effective from March 2020

ODM Financial Limited t/a ODM Financial Advisers

These Terms of Business set out the general terms under which our firm will provide business services to you and the respective duties and responsibilities of both the firm and you in relation to such services. Please ensure that you read these terms thoroughly and if you have any queries, we will be happy to clarify them. If any material changes are made to these terms, we will notify you.

Authorised Status

ODM Financial Limited t/a ODM Financial Advisers is regulated by the Central Bank of Ireland as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations, 2018; as an Investment Intermediary authorised under the Investment Intermediaries Act, 1995, as a Mortgage Intermediary authorised under the Consumer Credit Act, 1995 and as a Mortgage Credit Intermediary pursuant to the European Union (Consumer Mortgage Credit Agreements) Regulations 2016. Copies of our regulatory authorisations are available on request. The Central Bank of Ireland holds registers of regulated firms. You may contact the Central Bank of Ireland on 1890 777 777 or alternatively visit their website at www.centralbank.ie to verify our credentials. Our registration number is C144209.

Statutory Codes

ODM Financial Advisers is subject to the Consumer Protection Code, Minimum Competency Code and Fitness & Probity Standards which offer protection to consumers. These Codes can be found on the Central Bank's website www.centralbank.ie

Our Services

ODM Financial Advisers is a member of Brokers Ireland. As a member of Brokers Ireland, we must be in a position to place insurance with at least five insurers of the relevant form (life/non-life) and therefore can generally give consumers greater choice than agents and tied agents.
Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life & pensions/mortgages. A full list of insurers, product producers and lending agencies with which we deal is available on request.

Fair and Personal Analysis

We offer advice on a ***fair and personal analysis basis*** in relation to all Financial Services products and services. This describes the extent of the choice of products and providers offered by an intermediary within a particular category of life assurance, general insurance, mortgages, and/ or a specialist area. The number of contracts and providers considered must be sufficiently large to enable an intermediary to recommend a product that would be adequate to meet a client's needs.

The number of providers that constitutes 'sufficiently large' will vary depending on the number of providers operating in the market for a particular product or service and their relative importance in and share of that market. The extent of fair analysis must be such that could be reasonably expected of a professional conducting business, taking into account the accessibility of information and product placement to intermediaries and the cost of the search.

In order to ensure that the number of contracts and providers is sufficiently large to constitute a fair analysis of the market, we will consider the following criteria:

- The demands and needs of the customer,
- the size of the customer order,
- the number of providers in the market that deal with brokers,
- the market share of each of those providers,
- the number of relevant products available from each provider,
- the availability of information about the products,

- the quality of the product and service provided by the provider,
- cost, and
- any other relevant consideration.

Life, Pensions & Investments

ODM Financial Advisers provides life assurance, pensions and investments on a fair and personal analysis basis i.e. providing services on the basis of a sufficiently large number of contracts and product producers available on the market to enable us to make a recommendation, in accordance with professional criteria, regarding which contract would be adequate to meet your needs.

We will provide assistance to you for any queries you may have in relation to the policies or in the event of a claim during the life of the policies and we will explain to you the various restrictions, conditions and exclusions attached to your policy. However, it is your responsibility to read the policy documents, literature and brochures to ensure that you understand the nature of the policy cover; particularly in relation to PHI and serious illness policies.

Specifically, on the subject of permanent health insurance policies it is our policy to explain to you a) the meaning of disability as defined in the policy; b) the benefits available under the policy; c) the general exclusions that apply to the policy; and d) the reductions applied to the benefit where there are disability payments from other sources.

For a serious illness policy, we will explain clearly to you the restrictions, conditions and general exclusions that attach to that policy.

Non-Life

We can introduce you to JLT Ireland Ltd, they can arrange for you all the commercial, general and health insurance needs. We cannot advise on this area, but we can make an introduction for you. We do not receive a remuneration from JLT in respect of any referral.

Mortgages

Through the lenders or other undertakings with which we hold an agency, ODM Financial Advisers can provide advice on and arrange mortgage products from the following range: fixed-rate loans, variable rate mortgages, capital & interest mortgages, interest only mortgages, endowment mortgages, pension mortgages and residential investment property. ODM Financial Advisers provides mortgage advice on a fair analysis basis (providing services on the basis of a sufficiently large number of contracts and product producers available on the market to enable the firm to make a recommendation, in accordance with professional criteria, regarding which contract would be adequate to meet your needs).

We will need to collect sufficient information from you before we can offer any advice on housing loans. This is due to the fact that a key issue in relation to mortgage advice is affordability. Such information should be produced promptly upon our request.

Disclosure of Information

It is your responsibility to provide complete and accurate information for insurers when arranging a policy. Failure to disclose any material information to your insurers may invalidate your cover and could mean that all or part of a claim will not be paid. It is also your responsibility to provide complete and accurate information to Financial Institutions in order for them to conduct a proper credit worthiness assessment when arranging Mortgage finance

Regular Reviews

It is in your best interests that you review, on a regular basis, the products which we have arranged for you. As your circumstances change, your needs will change. You must advise us of those changes and request a review of the relevant policy so that we can ensure that you are provided with up to date advice and products best suited to your needs. Failure

to contact us in relation to changes in your circumstances or failure to request a review, may result in you having insufficient insurance cover and/or inappropriate investments.

Periodic Assessment of Suitability: Insurance Based Investments Instruments (IBIP) and other Investment Instruments (MiFID)

The firm does not provide ongoing suitability assessments.

Conflicts of interest

It is the policy of our firm to avoid conflicts of interest in providing services to you. However, where an unavoidable conflict of interest arises, we will advise you of this in writing before providing you with any service.

Default on payments by clients

Our firm will exercise its legal rights to receive payments due to it from clients (fees and insurance premiums) for services provided.

Product producers may withdraw benefits or cover in the event of default on payments due under policies of insurance or other products arranged for you. We would refer you to policy documents or product terms for the details of such provisions.

Mortgage lenders may seek early repayment of a loan and interest if you default on your repayments. Your home is at risk if you do not maintain your agreed repayments.

Complaints

While we are happy to receive verbal complaints, it would be preferable that any complaints are made, in writing. We will acknowledge your complaint within 5 business days, and we will fully investigate it. We will provide a written reply to all complaints received. We shall investigate the complaint as swiftly as possible, and, the complainant will receive an update on the complaint at intervals of not greater 20 business days starting from the date on which the complaint is made.

On completion of our investigation, we will provide you with a written report of the outcome. In the event that you are still dissatisfied with our handling of or response to your complaint, you are entitled to refer the matter to the Office of the Financial Services & Pensions Ombudsman (01-5677000 or info@fspo.ie). A full copy of our complaint's procedure is available on request.

Data Protection

ODM Financial Advisers complies with the requirements of the General Data Protection Regulation 2018 (GDPR) and the Irish Data Protection Act 2018.

We collect your personal details in order to provide the highest standard of service to you and are committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights as a client. The data will be processed only in ways compatible with the purposes for which it was given and as outlined in our Data Privacy Notice, this will be given to all our clients at the time of data collection. We would also like to keep you informed of mortgage, insurance, investment and any other services provided by us or associated companies with which we have a formal business arrangement, which we think may be of interest to you. We would like to contact you by way of letter, email or telephone call. If you do wish to receive such marketing information, we will note your wishes in our client declaration.

Compensation Scheme

We are members of the Investor Compensation Scheme operated by the Investor Compensation Company Ltd. See below for details.

Investor Compensation Scheme

The Investor Compensation Act, 1998 provides for the establishment of a compensation scheme and the payment, in certain circumstances, of compensation to certain clients (known as eligible investors) of authorised investment firms, as defined in that Act.

The Investor Compensation Company Ltd. (ICCL) was established under the 1998 Act to operate such a compensation scheme and our firm is a member of this scheme.

Compensation may be payable where money or investment instruments owed or belonging to clients and held, administered or managed by the firm cannot be returned to those clients for the time being and where there is no reasonably foreseeable opportunity of the firm being able to do so.

A right to compensation will arise only:

- If the client is an eligible investor as defined in the Act; and
- If it transpires that the firm is not in a position to return client money or investment instruments owned or belonging to the clients of the firm; and
- To the extent that the client's loss is recognised for the purposes of the Act.
- Where an entitlement to compensation is established, the compensation payable will be the lesser of:
- 90% of the amount of the client's loss which is recognised for the purposes of the Investor Compensation Act, 1998; or
- Compensation of up to €20,000.

For further information, contact the Investor Compensation Company Ltd. at (01) 224 4955.

Anti - Money Laundering/Countering the Financing of Terrorism

Our firm reserves the right to request any facts about a client which it reasonably believes it needs to know in order to comply with the prevailing Criminal Justice (Money Laundering and Terrorist Financing) legislation.

Remuneration - Schedule of Fees & Charges:

Life, Pensions & Investments (Life Assurance Company)

ODM Financial Advisers is remunerated by commission and other payments from Life Assurance Companies on the completion of business. You may choose to pay in full for our services by means of a fee; our fee structure is outlined in **Table 2.** Where we receive recurring commission, this forms part of the remuneration for initial advice provided as detailed in **Table 1**.

We reserve the right to charge additional fees if the number of hours relating to on-going advice/assistance exceeds 3 hours, these fees will be charged in line with our hourly fee structure below. We will notify you in advance when these fees are applicable.

In certain circumstances, it will be necessary to charge a fee for services provided. Where such fees are chargeable, we will notify you in writing in advance. In other circumstances where fees are chargeable or where you choose to pay in full for our service by fee, we will notify you in writing in advance and agree the scale of fees to be charged if different from fees outlined below.

If we receive commission from a Life Assurance Company, this may be offset against the fee which we will charge you. Where the commission is greater than the fee due, the commission may become the amount payable to the firm unless an arrangement to the contrary is made.

In addition, we may earn a ***non-monetary benefit*** which we will only accept if it enhances the quality of our service to you our client. For example: attendance at a product seminar or assistance with branding, IT support etc.

A summary of all remuneration arrangements from each Life Assurance Company is available on our website www.odmfinancial.ie

Commission Based Remuneration (Table 1):

Product Type	**Commission (instead of fee)**	**Commission for servicing and Ongoing Advice**
Regular Premium Pension	15% of first annual contribution (min €500)	Up to 0.75% of the fund value
Single Pension Contributions and Transfers	Up to 5% of the amount invested	Up to 0.75% of the fund value
Approved Retirement Funds	Up to 5% of the amount invested	Up to 0.75% of the fund value
Retirement Bonds	Up to 5% of the amount invested	Up to 0.75% of the fund value
Single Top Ups to a Regular Premium Plan	Up to 5% of the amount invested	Up to 0.75% of the fund value
Investment Bonds & Portfolios	Up to 5% of the amount invested	Up to 0.75% of the fund value
Regular Monthly Investment Plans	10% of first annual contribution (min €250)	Up to 0.75% of the fund value
Single Top Ups to a Monthly Investment Plan	Up to 5% of the amount invested	Up to 0.75% of the fund value
Annuity	Up to 3% of the amount invested	Nil

As outlined above, you can opt to pay for our Financial Advice based on the Fees outlined below instead of our firm receiving commission from the Life Assurance Company.

Life, Pensions & Investments (Life Assurance Company ~~Non-MiFID~~) Fee based service (Table 2):

You may elect to deal with us on a fee basis

Principles / Directors	€300 per hour
Senior Advisers	€200 per hour
Support staff	€150 per hour

Additional fees may be payable for complex cases or to reflect value, specialist skills or urgency, our scale of fees for such cases range from a minimum of €300 to a maximum €500 per hour. We will notify you in advance and agree the scale of fees to be charged.

In addition, we may earn a non-monetary benefit which we will only accept if it enhances the quality of our service to you our client. For example: attendance at a product seminar or assistance with branding, IT support etc.

A summary of all remuneration arrangements from each Life Assurance Company is available on our website www.odmfinancial.ie

Remuneration MiFID Services:
We will be remunerated for MiFID Services by way of fee only from you our client. We will not receive nor accept any remuneration from the MiFID Product Producers to whom orders are transmitted. Fees are charged per hour or part thereof and are based on a professional expertise &/or on a time accrued basis. This will be discussed and agreed in writing in advance of any work being undertaken on a client's behalf.

Fees Table:

Professional Advisor	Professional Fee (Hourly Rate Ex VAT)
Directors	€300.00
Senior Advisers	€200.00
Support Staff	€150.00

- Additional fees may be payable for complex cases or to reflect value, specialist skills or urgency, our scale of fees for such cases range from a minimum of €300 to a maximum €500 per hour. We will notify you in advance and agree the scale of fees to be charged.
- Professional Fees are non-refundable if a policy is cancelled.
- In addition, we may earn a ***non-monetary benefit*** which we will only accept if it enhances the quality of our service to you our client. For example: attendance at a product seminar or assistance with branding, IT support etc.
- A summary of our fees structure is also available on our website www.odmfinancial.ie

Mortgages

We charge a fee of €1,000 net of vat payable by you in advance in respect of mortgage applications. The advance fee payable will be refunded to you should a mortgage be drawndown and a commission received from a mortgage lender. We receive up to 1% (or whatever maximum is applicable) of the loan for arranging mortgage finance. This commission is paid by the mortgage lender. The actual amount of commission will be disclosed at a later stage in the ESIS (European Standardised Information Sheet) which will be forwarded to you. Information on the variation in levels of commission payable by the different creditors providing credit agreements being offered are available on request.

Please note that lenders may charge specific fees in certain circumstances and if this applies, these fees will be specified in your Loan Offer. You have the right to pay a fee separately and not include it in the loan. Typically, this situation arises in relation to specialist lending.

In addition, we may earn a ***non-monetary benefit*** which we will only accept if it enhances the quality of our service to you our client. For example: attendance at a product seminar or assistance with branding, IT support etc.

A summary of all remuneration arrangements from each Mortgage Lender is available on our website www.odmfinancial.ie