

## Cantor Fitzgerald Ireland Ltd ("Cantor")

## **Corporate Advisory Account Opening Document**

## HOW TO PROCEED

ACCOUNT SET	UP CHECKLIST:
1.   I/We have	ve completed the attached application form in full and signed and dated same.
2.	ve completed the attached CRS/FATCA form and have signed and dated.
3. Please also e	nclose the following (Documents must be certified if the entity is <b>NON</b> Irish):
A. Copy	y of the latest Audited Accounts
В. Сору	y of Constitutional Documents
C. Copy	y of Certificate of Incorporation
D. Copy	y of the Company's register of shareholders**
incorpo	of the shareholders with 25% or more holding is a corporate entity, please provide the certificate of oration, constitutional documents for this entity including a company structure chart showing the te beneficial owners.
	ified copy* of registered office address – <b>MUST</b> be a bank statement that matches the I provided on the application form.
F. <b>(i)</b> C	ertified copy* of ID (Passport/Drivers Licence) - please ensure it is in date.
	wo certified copies* or two originals of the bills listed below issued in the last 6 months and with the same address as noted on the application.
• Ga	s, electricity, phone or motor insurance certificate/home insurance certificate/tax certificate
	nk statement from any Irish Bank
	cial insurance document or Revenue Commissioners document
	st be stamped and certified to be a true copy of the original by a member of Garda/Police, Solicitor Cantor member of staff.
A list of a cantorfitz	acceptable/unacceptable Anti Money Laundering documents can be found on our website gerald.ie
FOR	TWO Directors
FOR	<b>ALL</b> Authorised Persons
	<b>EACH OF</b> the ultimate beneficial owner(s) who have 25% or more shares or voting rights be company
4.	re completed and attached the Corporate Declaration of Residence in Ireland (if applicable).
ost/Delivery	Return the completed application and identification to:
	DUBLIN: Cantor Fitzgerald Ireland Ltd, Cantor Fitzgerald House, 23 St Stephen's Green, Dublin 2
	LIMERICK: Cantor Fitzgerald Ireland Ltd, Crescent House, Hartstonge St., Limerick  CORK: Cantor Fitzgerald Ireland Ltd, 45 South Mall, Cork
Queries/Advice	Call your Financial Advisor or your Cantor Fitzgerald Account Manager:
	DUBLIN: +353 1 633 3800. CORK: +353 21 422 2122. LIMERICK: +353 61 436 500

Email Queries to Client Services at ireland@cantor.com

www.cantorfitzgerald.ie

## COMPLETED

## **Advisory Account Opening Document**





FOR OFFICE USE OF Cantor Broker Owne		Client Account Number DS
1. Company	Details (PLEASE USE BLOCK CAPITALS)	
Name		
Registered Addr	ess	
		Country:
Principal Addres	S	
		Country:
Tel		Reg No.
Nature of Comp	any Businesss	
Country of Inco	rporation	LEI* Code.
Tax Identification	n No.	
2. Director I	Details (PLEASE USE BLOCK CAPITALS)	
Director 1		Director 2
Title M	Ar Mrs Ms Miss Other	Title Mr Mrs Ms Miss Other
Surname		Surname
Forename(s)		Forename(s)
Residential Address		Residential Address
Nationality		Nationality

## COMPLETED ALL SECTIONS MUST



3. Shareholder Details (PLEASE USE BLOCK CAPITALS)	
Please Note: A beneficial owner is defined as a personal the entity.	n/entity who have 25% or more share holding OR voting rights in
2. Is one or more shareholder a company structure? Yes If "Yes" please provide a copy of the Trust/Company ownership	No No structure up to and including the ultimate beneficial owner(s).
<u>Ultimate Beneficial Owner 1</u>	Ultimate Beneficial Owner 2
Title Mr Mrs Ms Miss Other	Title Mr Mrs Ms Miss Other
Surname	Surname
Forename(s)	Forename(s)
Residential Address	Residential Address
Co of Residency	Co of Residency
Nationality	Nationality
% Holding	% Holding
Illaimeata Banafisial Osuman 3	Ultimate Danefisial Owner 4
Ultimate Beneficial Owner 3  Title Mr Mrs Ms Miss Other	Ultimate Beneficial Owner 4  Title Mr Mrs Ms Miss Other
Surname	Surname
Forename(s)	Forename(s)
Residential Address	Residential Address
Co of Residency	Co of Residency
Nationality	Nationality
% Holding	% Holding

# ALL SECTIONS MUST BE COMPLETED

## **Advisory Account Opening Document**

Corporate Account Application Form



Cantor will op	g persons are authorised to issue instructions perate on the instruction of one Authorised I the below persons will be the only people to	Person.	
Authorised Pe	erson 1 (Key Contact Person)	Authorised F	Person 2
Title N	Ar Mrs Ms Miss Other	Title	Mr Mrs Ms Miss Other
Surname		Surname	
orename(s)		Forename(s)	
Residential Address		Residential Address	
Email*		Email	
ēl		Tel	
signature		Signature	
This will be the le	ead email for account communications. An email addres	 ss is required to op	en an account.
uthorised Pers	son 3	Authorised F	Person 4
tle N	1r Mrs Ms Miss Other	Title	Mr Mrs Ms Miss Other
ırname		Surname	
rename(s)		Forename(s)	
sidential ddress		Residential Address	
nail		Email	
		Tel	
		Signature	

## COMPLETED MUST ALL SECTIONS



5. Bank Details (PLEASE	USE BLOCK CAPITALS)	
Bank Name		
Bank Address		
Account Name		
IBAN*		BIC
*IBAN includes account number and so	ort code and is an international standard for identif	ying bank accounts across national borders.This is detailed on the bank statement.
6. Financial Backgrou	nd (Please use block capitals)	
Please complete ALL sections	5	
•	f the most recent or indicative Net A	Asset Value of the Company €
	•	ision of advice and the suitability of investments so a value must be
provided for these purposes.  (ii) Please provide details of	of the following: Any incomplete will	ha assumad as €0
Debts €	Other Investments €	Cash Deposits €
Debts	Other investments	Casil Deposits -
Source of Wealth/Funds		
(iii) Please indicate how yo	our <u>overall wealth</u> was indicate more than one option.	(iv) Please indicate the source of your <u>initial transfer</u> to Cantor. You can indicate more than one option.
Company Profits	ndicate more than one option.	Bank Deposit Account
Property Investment		Saving Account
Sale of Business		Transfer from other Investment Provider
Jaic Of Dusificss		
Equity/Fund Investment		Other (please specify):
		Other (please specify):
Equity/Fund Investment		Other (please specify):
Equity/Fund Investment		Other (please specify):
Equity/Fund Investment Other (please specify):  Dividends	e you will receive cash dividends and in	

## COMPLETED ALL SECTIONS MUST



7. Investment Objectives and Ris	k (Based on Both Applicants if a Joint Ap	PLICATION)
Portfolio Individual Transaction Size (Ple	ease answer all)	
(i) What is your anticipated total portfolio size	(ii) What is your average anticipated transaction size	(iii) If you have a specific investment time horizon for your account
Less than €20,000	Less than €10,000	please indicate below
Between €20,000 and €50,000	Between €10,000 and €50,000	Less than 1 year
Between €50,000 and €150,000	Between €50,000 and €250,000	Between 1 and 5 years
Between €150,000 and €500,000	Over €250,000	Over 5 years
Over €500,000		
Income Requirement		
Any incomplete will be assumed as €0.		
Please state the approximate income require	ement, if any, from your investment with Canto	or <u></u> €
Which of the following best describes y		_
Capital Growth only	Mix of Income with Capital Growth	Income only
Permitted Investment Instruments Please tick which instruments you would could go not select any we will assume all a		n one option.
Equities	Structured Products	Investment Funds (May include derivative
Government Bonds	Corporate Bonds	Corporate Finance Product
Derivatives including CFDs*	Other (please specify)	
Very Cautious Investor* You are risk averse. Your investment prestrategy is at the expense of potential cast this category is not 100% capital guarantee.  Cautious Investor You are prepared to accept low levels of Considered Investor You are looking for a balance of risk and multiple the potential income from investigation.  Considered Risk Taker	f risk for the prospect of slightly higher returns d reward. You accept during periods of marke	ital. You acknowledge that this investment  5. t risk potential losses may exceed by a
returns. You accept that volatility in mar  Risk Taker  You are willing to accept high volatility I You acknowledge that in light of the un potential loss in excess of the initial amo	evels and fluctuations in the value of your investigation in the value of your investigation in the value of your investigation invested.	estments for the prospect of higher returns.
(ii) You find it interesting to explore inv		trangly Disagrap
Strongly Agree Agree Neith	er Agree nor Disagree Disagree S	trongly Disagree  Please continue to next page

## **Advisory Account Opening Document**





7. Investment Objectives and Risk continued
(iii) Six months after making an investment where your capital is at risk, your investment performs poorly in line with weak financial markets. Which option described below, best suggests your possible course of action?
Sell all the investment and put the proceeds in a deposit account to prevent further loss
Sell part of the investment, purchasing a less risky investment with the proceeds to reduce further losses
Monitor the investment ahead of deciding what to do
Invest more monies to avail of weaker prices expecting recovery
Make a riskier investment to recover all losses in the expectation of recovery

## 8. Knowledge & Experience Relevant to the <u>Decision Maker\*</u> (PLEASE USE BLOCK CAPITALS)

Warning: The following information requested in this form will be used by Cantor to carry out a suitability assessment for you. This is to enable us to act in your best interest. Please provide additional information where you feel it may be relevant.

\*Decision Maker is a person authorised on the account and appointed to make decisions on behalf of the account i.e. the account holder, beneficial owner or authorised signatory. A group of two or more natural persons are required to designate one person's Knowledge & Experience for the purposes of conducting the suitability assessment.

(i) Please select your previous trading experience: (You can select more than one option if applicable)

<b>EXECUTION ONLY</b> (no advice)	<b>ADVISORY</b> (broker advises, you decide)	<b>DISCRETIONARY/MANAGED</b> (broker agrees investment parameters with you and has discretion to transact)	NO PREVIOUS EXPERIENCE

(ii) Please indicate your investment experience in relation to the following Financial Instruments:

Basic: Have some knowledge but limited trading history.

**Good:** Have knowledge and have traded over a number of years.

**Extensive:** Have knowledge and have traded consistently over the past 5 years.

## THESE COLUMNS ARE MANDATORY

## THESE COLUMNS ARE MANDATORY

FINANCIAL INSTRUMENTS	NONE**	BASIC	GOOD	EXTENSIVE	NUMBER OF YEARS EXPERIENCE	NUMBER OF TRADES IN THE LAST 5 YEARS (if 'zero' trades please note 0 in the box)
Equities						
Corporate Bonds						
Government Bonds						
Investment Funds						
Structured Products						
Corporate Finance/ Unquoted Investments						
Derivatives (CFD's, Options, Futures)						
Illiquid Investments (Cannot be easily accessed and/or not traded on an exchange)						

<sup>\*\*</sup>If you have selected NONE for any Financial Instruments experience, you do not need to complete NUMBER OF YEARS EXEPERIENCE and NUMBER OF TRADES IN THE LAST 5 YEARS





8. Knowledge & Experience Relevant to the Decision Maker* continued		
(iii) If you have answered '0' for NUMBER OF TRADES IN THE LAST 5 YEARS in part (ii) above, please e attained your years experience? (If not applicable please write N/A or leave blank)	xplain how you	have
(iv) If you have Derivatives experience noted in part (ii) above, please answer the following:		
1. Did you use Derivatives for Hedging purposes? i.e. to reduce risk	Yes	No
2. Did you use Derivatives for Speculative purposes? i.e. trading financial instruments involving high risk, in an expectation of significant returns	Yes	No _
(v) Relevant Professional Qualification or Experience		
1. Do you have a relevant professional qualification?	Yes	No
Please list qualification(s)		
2. Do you work as an investment manager/advisor?	Yes	No _
3. Are you a member of a professional body? e.g. ACOI, LIA, IIB, Chartered Accountants Ireland etc.	Yes	No 🗆
9. Research and Product Information		
Weekend Papers Summary  Ethical Investing  10. Resolutions of board of directors		
We certify that at a meeting of the directors of ("Client"), dulyday of, 20, the following resolutions were duly passed.	convened and h	eld on t
Authority to open a Securities dealing account		
That an account or accounts be opened with Cantor Fitzgerald Ireland Ltd (the 'Company') at 75 Steph the terms and conditions outlined in the foregoing Account Opening Document, the Terms and Conditions below. The Client authorises the persons specified in <b>Part 2</b> above to execute the Account Cobehalf.	onditions bookle Opening Documer	et and t nt on th
The Client confirms the information provided by the nominated decision maker in Section 8 is correct at the information that will be used to determine the knowledge and experience of the client.	and understands	that this
Authority to Cantor Fitzgerald Ireland Ltd (the 'Company')  The other Cantor Fitzgerald Ireland Ltd (the 'Company')  The other Cantor Fitzgerald Ireland Ltd (the 'Company')  The other Cantor Fitzgerald Ireland Ltd (the 'Company')		
That the Company be authorised and instructed to undertake the following:  1. To act on instructions on dealings with securities, etc.		
Subject to the terms and conditions outlined in the Company's Account Opening Document to act of "Authorised Persons" specified in <b>Part 4</b> above (or as varied from time to time) with regard to the part dealings, in securities or documents of the Client or any foreign currency transactions (without prejuto refuse to allow accounts become overdrawn).	ourchase or sale o	f, or oth
2. To honour orders		
To honour and comply with any orders to withdraw any or all money on any account or accounts of the and with instructions to deliver, dispose of or deal with any securities, deeds or documents or other time to time in the Company's possession for the account or accounts of the Client whether by way or otherwise provided that the instructions are received as agreed with the Company.	r property whatso	bever fro
	Please continue	to next n

PAGE 8

## **Advisory Account Opening Document**

Corporate Account Application Form



## 10. Resolutions of board of directors continued

## • Not to restrict Company's right to lien, etc.

The Client agrees that nothing in the arrangements between the Company and the Client shall be treated as constituting, an implied agreement restricting or negating any lien, charge, pledge or right of set-off.

## • To furnish the Company with memorandum, etc.

That the Company be furnished with an up to date copy of the Memorandum and Articles of Association and the Certificate of Incorporation.

## · To provide list of directors, etc.

That the Company be furnished with a list of the names of the Directors, Secretary and other officers of the Client and with specimens of their signatures and that the Company be notified immediately in writing signed by any Director or the Secretary of the Client of any changes which may from time to time take place in these details and be entitled to act on any such notice and that until receipt of such notice the Company may continue to treat the last list received as correct.

## • Change in Decision Maker

The Client undertakes to inform CFIL if the nominated decision maker is no longer valid (ie. is no longer a beneficial owner/authorised signatory of the client). On such an event, the client acknowledges that it is its responsibility to nominate a new decision maker for the purposes of providing the information in Section 8 for the assessment required.

## To communicate resolutions to the Company

That these resolutions be communicated to the Company and shall constitute the Account Opening Document and remain in force until an amending resolution shall be passed by the board of Directors and a copy of such resolutions certified by any Director or the Secretary of the Client shall be communicated to the Company.

## Interpretation

That in this resolution the expressions Director(s) and Secretary shall be construed as Director(s) and Secretary of the Client and shall, in the case of Director(s) include Alternate Director(s) and in the case of Secretary, shall include any Joint Secretary, Assistant Secretary or Temporary Secretary.

## Statements of Account

The Client agrees that it will examine all statements supplied by the Company setting out transactions on any of its account within 30 days.

## . Entry of resolutions in minute book

We certify that the above resolutions have been duly entered in the minute book and signed by the Chairman and are in accordance with the Articles of Association of the Company and are, at this date, in full force and effect.

DIRECTOR'S SIGNATURE	DIRECTOR'S SIGNATURE
Print Name	Print Name
Date Signed DD MM YY	Date Signed DD MM YY

# LL SECTIONS MUST BE COMPLET

## **Advisory Account Opening Document**

Corporate Account Application Form



## 11. Acknowledgement

In signing this document it will constitute a contract, both legally binding and enforceable. If you have any queries about any aspect of the account opening documentation please contact Cantor for clarification or, if you think it appropriate to do so, obtain independent legal advice.

The undersigned hereby acknowledges that:

- (a) I/We have carefully read, acknowledge and understand the terms of the below listed documentation which I/we have been presented with and have had an opportunity to consider. I/We hereby agree that by signing this acknowledgement that I/we will be bound by all terms and conditions contained in the following documents:
  - 1. Corporate Advisory Account Opening Document
  - 2. Terms and Conditions booklet:
    - i. Terms and Conditions of Service
    - ii. Conflicts of Interest Policy
    - iii. Order Execution Policy
    - iv. Information on Financial Instruments
- (b) The service description set out in the Terms and Conditions booklet incorporates the service to be provided by Cantor to me/us in its entirety, and for which I/we now hereby apply.
- (c) The risk profile, investment experience and restrictions provided in the Account Opening Document is a complete and accurate record of all information relevant and necessary to allow Cantor to provide an advisory service to the company.
- (d) I/We acknowledge that Cantor will arrange for a nominee account to be opened with Pershing Securities International Limited on behalf of the company.
- (e) I/we have been presented with and have had an opportunity to consider the **Client Asset Key Information Document** and I/We have carefully read, acknowledge and understand the arrangements Cantor have put in place for holding client assets and the risks associated with them.
- (f) I/We have been presented with a current rate card and I/we are aware that any changes to this will be updated to the Cantor Fitzgerald website for my/our reference.
- (g) Electronic Communications

By opening an account with Cantor Fitzgerald Ireland you are consenting to the electronic delivery of communications and documentation through our online portal, to which we will issue you the necessary access as part of account opening process. Within our online portal you can view your account information, transactions, documentation and communications.

If you do not want documentation issued to you electronically please tick the box below:

I/We wish to receive any communications and documentation issued to my/our client portal in paper format.

Please note if you choose NOT to avail of electronic communications through our online portal charges may be incurred for paper documentation. These charges will be deducted from your account. Please see our rate card for further details.

You may receive periodic documentation in paper format not related to this consent.

## Client Acceptance DIRECTOR'S SIGNATURE Print Name Print Name Date Signed DD MM YY Date Signed DD MM YY

CANTOR FITZGERALD - DUBLIN: Cantor Fitzgerald House, 23 St Stephen's Green, Dublin 2, D02 AR55. Tel: +353 1 633 3800. Fax: +353 1 633 3856. CORK: 45 South Mall, Cork, T12 XY24. Tel: +353 21 422 2122. LIMERICK: Crescent House, Hartstonge St., Limerick, V94 K35Y. Tel: +353 61 436500.

email: ireland@cantor.com web: www.cantorfitzgerald.ie

## **Declaration of Residence in Ireland**

## Please complete this section if the Declaration is being made by a **Company resident in Ireland.**

	pany:	
Address of Co	mpany:	
Irish tax refe	ence number for the Company:	
the relevator for the pu	that, at the time of making this declaration, the above-named control distributions in respect of which this declaration is made, there rposes of Chapter 8A of Part 6 of the Act.	by being an "excluded person" an "excluded person", I will, by
written no	tice, bring that fact to the attention of the "relevant person" in relati	on to the relevant distributions.
Authorised Si	gnatory: (Declarant)	Title: (Mr./Ms. etc.)
Print name of	Signatory here:	
	Signatory here:	Date: /
		Date:/
		Date:/
		Date:/

## **CRS/FATCA Individual/Entity Self-Certification**

Please see our useful forms section on our website for the Common Reporting Standard "CRS" and Foreign Account Tax Compliance Act "FATCA" Appendix with further definitions and information on the below classifications

Self-Certification	Tor FAICA and CRS (PLEASE USE I	LOCK CAPITALS)
	ON HOW TO COMPLETE THIS Fevant account type and complete Second Technology of the Complete Second Technology	
Please select the rele	evant account type, and complete Se	ction 1(b), 2, 3, 4 (if applicable) and 5.
		utional Pension (e.g. Trust Structure) Partnership
Other type of entire	ty (Please note legal structure):	-
		ply to your account type please complete the form as per your local tax
SECTION 1: Acco	unt Details	
1(a): Personal Detail:	S Please complete if applicable to your a	ccount type, based on the instructions noted above:
Person 1		Person 2
Title Mr	Mrs Ms Miss Other	Title Mr Mrs Ms Miss Other
Surname		Surname
Forename(s)		Forename(s)
Residential		Residential
Address		Address
1(b): Entity Details P	Please complete if applicable to your acco	ount type, based on the instructions noted above:
ŕ		
Entity Name (Legal)		
Registered Address		
		Country:
SECTION 2: Decla	aration of Person or Entities Ta	x Residency All account types MUST complete
Name of Person/Entity		
SECTION 3: Entity this form	y's Classification Please complete if	applicable to your account type, as per the instructions at the start of
You are required to ch	oose one CRS classification and one FAT	CA classification within this section.
	e of the below options:	
FATCA Classification		GIIN (if applicable)
Reporting Model 1		
Reporting Model 2		
(continued on following	ng page)	

# ALL RELEVANT SECTIONS MUST BE COMPLETED

## **CRS/FATCA Individual/Entity Self-Certification**



Participating FFI	
Registered Deemed Compliant (other than Reporting Model 1 FFI/Sponsored FFI or Non-Reporting IGA FFI) Sponsored Direct Reporting NFFE	
Direct Reporting NFFE	
Sponsored FFI	
Non-Reporting IGA	
Foreign Government	
Entity Wholly Owned by an Exempt Beneficial Owner	
501 (c) Organization	
International Organization	
Exempt Retirement fund	
Active Non-Financial Foreign Entity	
Non-Profit Organization	
Passive Non-Financial Foreign Entity (also complete Section 4 for Controlling Persons)	
Other Specify:	
the GIIN provided above is issued in the name of your sponsor, plea	se provide vour sponsor's name and sponsor's GIIN
ime of the sponsoring Entity	se provide your sponsor s marrie and sponsor's aim
IN number of the sponsoring Entity	
in that iber of the sportsoning entry	
u MUST choose one of the below options:	
S Classification	
Financial Institution other than investment entity (custodial institut	ion, depository institution/specified insurance company)
Financial Institution non-reporting according to local jurisdiction le	gislation where you are a resident
Investment Entity with Tax Residence in a non-participating jurisdic (also complete Section 4 for Controlling Persons)	ction and managed by another FI
Passive Non-Financial Entity (also complete Section 4 for Control	olling Persons)
Active Non-Financial Entity which is a Government/Central Bank/Ir	nternational Organization
Active Non-Financial Entity (corporation that is publically traded or	an affiliate of a publicly traded corporation)
Active Non-Financial Entity-other	

## CRS/FATCA Individual/Entity Self-Certification CANTOR Bitzgerald



## Self-Certification for FATCA and CRS (PLEASE USE BLOCK CAPITALS)

SECTION 4: CRS and FATCA - Controlling Persons ("CP") Identification Please complete this section if you have completed section 1(b) AND have selected an entity classification, in the previous section, that notes section 4 must be completed.

- For a Trust this includes the settlor, the trustees, the protector (if any) and any known beneficiaries
- For a Corporation or Non-Corporate entity (other than a Trust) this would include natural persons who own or control, directly or indirectly, 25% or more of the entity
- Where no natural person is identified, the senior managing official is a controlling person
- TIN or equivalent must be provided
- Refer to table below for CP types

Controlling

## Should the below space not be sufficient, please provide information on a separate sheet.

Should Controlling Persons have more than one tax residence, please use the below space or provide information on a separate sheet.

Controlling Persons type code	Date of birth (dd/mm/yyyy)	Full residence address	Tax residence country	TIN /If TIN not available please indicate reason

<sup>\*</sup>By signing you are confirming the information to be accurate and complete.

## **Controlling Persons Type codes:**

CP of legal person – ownership	801	CP of legal arrangement – trust – other	808
CP of legal person – other means	802	CP of legal arrangement – other – settlor-equivalent	809
CP of legal person – senior managing official	803	CP of legal arrangement – other – trustee-equivalent	810
CP of legal arrangement – trust – settlor	804	CP of legal arrangement – other – protector-equivalent	811
CP of legal arrangement – trust – trustee	805	CP of legal arrangement – other – beneficiary-equivalent	812
CP of legal arrangement – trust – protector	806	CP of legal arrangement – other – other-equivalent	813
CP of legal arrangement – trust – beneficiary	807	Unknown	UN

# LL RELEVANT SECTIONS MUST BE COMPLETED

## **CRS/FATCA Individual/Entity Self-Certification**



## Self-Certification for FATCA and CRS (PLEASE USE BLOCK CAPITALS)

## SECTION 5: Declaration and Undertakings All account types MUST complete

- (a) I declare that all statements made in this declaration are, to the best of my knowledge and belief, correct and complete.
- (b) I acknowledge that the information contained in this form and information regarding the Account Holder and any Reportable Account(s) may be provided to the tax authorities of the country/jurisdiction in which this account(s) is/are maintained and exchanged with tax authorities of another country/jurisdiction or countries/jurisdictions in which the Account Holder may be tax resident pursuant to intergovernmental agreements to exchange financial account information under the Common Reporting Standard (CRS) and Foreign Account Tax Compliance Act (FATCA).
- (c) I certify that I am the Account Holder (or am authorised to sign for the Account Holder) of all the account(s) to which this form relates.
- (d) If there is a change in circumstances that affects the tax residence status of the Account Holder or causes the information contained herein to become incorrect or incomplete, I understand that I am obligated to inform Cantor Fitzgerald Ireland of the change in circumstances within 30 days of its occurrence and to provide a suitably updated CRS or FATCA self-certification.

## **Client Acceptance**

If you completed section 1(a) please ensure all beneficiaries sign below:

PERSON 1	PERSON 2 (if applicable)
Print Name	Print Name
Date Signed DD MM YY	Date Signed DD MM YY
If you completed <u>section 1(b)</u> please ensure the relevant authorised	signatories sign below:
AUTHORISED SIGNATORY 1	AUTHORISED SIGNATORY 2 (if applicable)
AUTHORISED SIGNATORY 1	AUTHORISED SIGNATORY 2 (if applicable)
Print Name  Date Signed DD MM YY	AUTHORISED SIGNATORY 2 (if applicable)  Print Name  Date Signed DD MM YY

CANTOR FITZGERALD - DUBLIN: Cantor Fitzgerald House, 23 St Stephen's Green, Dublin 2, D02 AR55. Tel: +353 1 633 3800. Fax: +353 1 633 3856. CORK: 45 South Mall, Cork, T12 XY24. Tel: +353 21 422 2122. LIMERICK: Crescent House, Hartstonge St., Limerick, V94 K35Y. Tel: +353 61 436500.

email: ireland@cantor.com web: www.cantorfitzgerald.ie



## CLIENT ASSETS KEY INFORMATION DOCUMENT

## 1. Introduction

As you are aware when Cantor Fitzgerald Ireland Ltd ("CFIL" or the "firm") provides investments services to you as our client under our terms of business, we have regulatory responsibility over client assets (both funds and financial instruments) in your account with us.

## 2. An explanation of the Regulations

The manner in which we handle your assets is governed by Part 6 of the Client Asset Requirements, Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Investment Firms) Regulations 2017 (SI 604 of 2017) and Schedule 3 Safeguarding Client Financial Instruments and Funds, EU MiFIR 2017. In addition, the CBI has issued guidance on the implementation of the Regulations. These documents can be found on the CBI Website at the following web address:

https://www.centralbank.ie/regulation/industry-market-sectors/client-assets

The regulations requires CFIL to provide you with a Client Assets Key Information Document ("CAKID") with the below objectives:

- Explain the key features of the regulatory regime that applies to the safeguarding of client assets;
- Explain what constitutes client assets under that regime
- Explain the circumstances in which that regime applies and does not apply,
- Explain the circumstances in which the investment firm will hold client assets itself, deposit client assets with a third party and deposit client assets with a third party outside the State,
- Explain the arrangements applying to the holding of client assets and the relevant risks associated with these arrangements.

Please read this document in conjunction with the firm's terms of business.

## **Key Principles of the Client Asset Regulations**

The purpose of the Regulations is to regulate and safeguard the handling of client assets to enable swift and safe return of these assets to the clients. However, it is important to note that it can never fully eliminate all risks relating to client assets some of which are identified in Section 5 below.

The key principles of these Regulations require that:

- client assets are segregated from the firm's own assets through registration of client assets in designated client asset accounts with the relevant institution holding the assets;
- all client assets are clearly identified in internals records and identifiable from the firm's own assets;
- we ensure the accuracy of both our records and those of the institutions holding the assets through regular reconciliations and daily calculations;
- we inform you through our terms of business and the CAKID of our arrangements and where relevant obtain your consent to the manner in which your assets are held;
- CFIL have appropriate risk management processes and systems, including documented policies and procedures to ensure that a risk based approach is adopted in safeguarding your assets.

## 3. An explanation of what constitutes client assets under the Regulations

## Client Assets include both

- (i) Client Funds: Any money, to which you are beneficially entitled, which we have received from you or on your behalf. It includes cash, cheques or other payable orders, current and deposit accounts including pledged accounts you may have.
- (ii) Client Financial Instruments: Any financial instrument (for example, shares, bonds and units held in collective investment schemes) held by us on your behalf including any held with a nominee.

The values assigned to your investments are not covered by these Regulations.



## 4. The circumstances in which the Regulations apply and do not apply

Client assets cease to be client assets where:

- a) they are paid, or transferred, to the client whether directly or into an account with a third party or a relevant party in the name of the client (not being an account which is also in the name of the investment firm); or
- b) where they are paid, or transferred, to a third party on the written instructions of the client and are no longer under the control of CFIL. In addition, acting in accordance with the terms of an investment management agreement or the completion of an order or application form will be considered to be a request from the client to pay the client assets to the relevant third party.

It is important to note that the Client Asset Regulations:

## Do apply:

- For funds or financial instruments that have been received in respect of activities which are regulated financial services.
- (ii) Once a cheque or other payable order is received by the firm except where it is payable to a third party and transmitted by CFIL to that party.
- (iii) Once interest is received where it has been agreed in writing that it is payable on your client funds.
- (iv) Until a cheque sent to you by us has been cashed.

## Do not apply:

- (i) When funds or financial instruments have been received in respect of activities which are not regulated financial services.
- (ii) Where you have transferred full ownership of funds or financial instruments to cover or secure present or future, actual or contingent or prospective obligations.
- (iii) Where we receive a cheque or other payable order from you or on your behalf payable to a third party and we transmit that to the third party.
- (iv) Funds that are due and payable to the firm in accordance with our terms of business.
- (v) Where a cheque or other payable order received from you on your behalf is not honoured by the bank.
- (vi) Where funds have been paid to you or a nominated third party (within the limited circumstances such instructions can be undertaken). Please note that payments to third parties can only be done on written instruction from you. Completion of an order or application form is considered a request to pay a third party.

- (vii) Where financial instruments are registered in your own name and we are not providing safe custody.
- 5. An explanation of the circumstances in which the firm will hold clients assets, hold client assets with a third party and hold client assets in another jurisdiction

Client Assets are never held directly by CFIL except where they have been received as part of the settlement process or held while in transit to the client or custodian. CFIL may hold physical assets for up to 10 days on limit orders. These assets are securely stored on CFIL premises and reconciled daily.

Cantor Fitzgerald have entered into an agreement ("the Pershing Agreement") with Pershing Securities International Limited ("PSIL", "Custodian")), Riverside Two, Sir John Rogerson's Quay, Grand Canal Dock, Dublin 2, D02 KV60, www.pershing.ie on behalf of ourselves and each of our clients whereby PSIL has agreed to provide clearing and settlement, safe custody, and other associated services for clients whom Cantor introduces to them. PSIL are regulated by the Central Bank of Ireland and are bound by the Client Asset Regulations.

All client asset accounts are clearly designated as "Client Asset Accounts" in both the internal records of PSIL and the records of any of the institutions actually holding the assets.

Those assets must be identifiable from ours or PSIL's own assets.

## 5.1 Client Funds:

Funds received are lodged to a pooled Client Asset Account with an eligible bank or credit institution. This means that a number of client's funds are held in the same client asset account with the bank or credit institution. However PSIL maintain detailed records identifying the amount being held for each client within the pooled account. We refer to section 5 regarding the risks associated with pooled accounts.

The funds are lodged to an account in the same currency as they are received unless PSIL do not have a client asset account in that currency and it would be unduly burdensome to open one. Amounts are converted at the rates prevailing when lodged to the Client Asset Account.

Where funds are received which include funds not qualifying as Client Funds the total funds are lodged to PSIL's client funds account but an immediate transfer is made of portion not deemed client funds to a non-client asset account.

Our preference is to receive funds by way of electronic transfer from clients. To facilitate this, details of PSIL's client asset bank account is provided to you.



## **5.2 Client Financial Instruments**

Where you have elected to use the safe custody services of PSIL, you consent that your investments will not be registered in your own name. Documents of title to your investments shall be held in physical or dematerialised form by PSIL or an Eligible Third Party.

Your investments will be held in a safe custody account designated as a client asset account and will be registered either in the name of

- (i) A nominee company owned by PSIL,
- (ii) A member of PSIL's group,
- (iii) An exchange which is a regulated market, or
- (iv) An Eligible Third Party, in accordance with the CBOI Client Assets Requirements. PSIL will exercise due skill, care and diligence in the selection, appointment and periodic review of any Eligible Third Party and the arrangements for holding and safekeeping of your investments, but PSIL shall not be responsible for any acts, omissions or default of any such Eligible Third Party save where such a default is caused by fraud, wilful default or negligence on the part of PSIL or its nominee company.

In some instances, due to the characteristics of a particular financial instrument it is not possible for PSIL to hold the assets within the Irish jurisdiction. In such cases they will be held with a custodian in the relevant jurisdiction. It is important to note that where assets are held outside this jurisdiction:

- (i) The Client Assets Regulations applicable may differ to those applicable within this state.
- (ii) The Investment Compensation scheme in operation in Ireland will not apply to any default by the foreign custodian.

PSIL hold client assets on a pooled nominee basis. Under this structure, the share register of the companies in which the underlying investors hold shares (investment companies) will show one entry for the nominee company. This entry will be the aggregate of all the individual investors' holdings. We refer to section 5 regarding the risks associated with pooled accounts and where assets are held outside Ireland or the European Economic Area (EEA) as described above.

PSIL are obliged to keep a detailed breakdown of each individual investor's holding. The total of these holdings must equate to the aggregate on the investment company register.

The firm does not provide safe custody arrangements for the holding of share certificates in client's own names. Where the firm receives share certificates either from clients or on behalf of clients as a result of share transactions the firm immediately passes them to the client or relevant settlement

agent. In such cases the firm maintains a log of all receipts and dispatch of share certificates.

## 6. The arrangements applying to the holding of client assets and the relevant risks associated with these arrangements

Your assets are held by PSIL in a specifically designated Client Assets Account within the institutions outlined above.

Transactions in respect of your assets may only be undertaken by the institution based on an instruction from Cantor Fitzgerald. The principal risks associated with holding your assets in this manner include exposures relating to:

- Loss of financial instrument and /or client funds (The Assets):- the risk that those charged with safeguarding client assets fail to ensure clients assets are only released when authorized by the fund manager or agent on behalf of the underlying investor.
- Administrative risk:- the risk that due to administrative errors, accurate records are not maintained detailing correct shareholdings of the underlying investors.
- Default Risk:- the risk that the owner of the nominee company goes into liquidation or the custodian goes into liquidation.
- Corporate Actions Risk:- the risk that corporate actions are missed by the custodians.
- Negligence or the perpetuation of a fraud by persons employed by either this firm or the institution holding the assets
- Misappropriation of your assets.
- Risks associated with pooled accounts: Under a pooled arrangement, client assets are held along with investments belonging to other clients. The risks associated with this arrangement are: a) This involves a possibility where assets held for one client are temporarily used to meet the settlement obligations of another client; b) In the event of an irreconcilable shortfall, clients may not receive their full entitlement and may share in the shortfall in proportion to their original share, or on some other basis in accordance with the applicable law; c) When your investments are pooled, you may not receive the same treatment or options when there is a corporate action or other event as you would if the investment were held in a separately designated account with a nominee company or custodian, or held in your own name. For example, following an allocation or share issue that favours the small investor, your allocation may be less than it otherwise would have been



if your investments had been registered in your own name.

- Risks associated with investments held by subcustodians outside Ireland or the EEA: Investing in overseas securities may give rise to different settlement, legal and regulatory requirements from those in Ireland or the EEA and different practices for the separate identification of investments. This means that your protection may be less should a default occur on the part of the custodian or sub-custodian. In certain jurisdictions where different laws/regulations apply, your investments will not necessarily be separately identifiable and may be subject to third party claims made against the relevant custodian or sub-custodian.
- "Un-invested money" (i.e. money not immediately required to settle an investment transaction) will not attract credit interest but may attract cash handling charges. Negative cash balances on your account may attract debit interest.

Cantor Fitzgerald endeavour to minimise these risks by confirming PSIL:

- Undertake risk assessments, as set out below, of institutions with whom your assets are held.
- Have written confirmation, in line with the Regulations, from these institutions that your assets will be segregated from the firm's own assets and will be held in separately designated Client Asset Accounts.
- Undertaking regular reconciliations of their records with those of the institutions and following up any differences in a timely manner.

- Undertaking daily calculations of the client money held for clients as per their records with the client money resource that should be held with the bank or credit institution.
- Ensuring instructions on your account are passed to the institutions by appropriately authorised members of staff.
- Ensuring financial instruments are registered and designated as outlined above.
- Ensuring adequate oversight of your assets is maintained by them through appropriate documented procedures and controls to minimise the risk of loss for clients.

PSIL in selecting relevant institutions to hold client assets on behalf of this firm's clients undertake an assessment, at least biannually, covering: The institution's credit rating (where available)

- (i) Known service levels for the institution (where we have past experience with the institution)
- (ii) Whether the institution is independent of the firm.
- (iii) What clients rights would be in the event of insolvency of the institution.

Where the institution is not in the jurisdiction a similar assessment is undertaken. Particular attention is paid to the establishing the relevant guidelines and compensation scheme.

Once an institution has been selected to hold Client Assets a facilities letter confirming specified details, as set out in the Regulations, will be obtained from the institution. No Client Assets will be lodged prior to receipt of the facilities letter.

**DUBLIN:** 23 St. Stephen's Green, Dublin 2, Ireland. Tel: +353 1 633 3800. Fax: +353 1 633 3856/+353 1 633 3857

**CORK:** 45 South Mall, Cork. Tel: +353 21 422 2122.

November 2021

LIMERICK: Crescent House, Hartstonge Street, Limerick. Tel: +353 61 436500.

email: ireland@cantor.com web: www.cantorfitzgerald.ie

CAKID.22.1-V1