

### Cantor Fitzgerald Ireland Ltd ("Cantor")

SSAP/ARF/PRB/PR	SA CLIENT S	SET UP CHECKLIST:
I have completed to do so.	d Part A, Part (	Section 7 and signed and dated in all places where the beneficial owner is required
I have completed	the CRS/FATO	CA form. (ONLY if the pension is NOT a trust structure)
I have attached a please ensure it i		O (Passport/Drivers Licence) certified by a Garda, Solicitor or Cantor member of staff -
I have attached t		ills or two originals of the bills listed below, issued in the last 6 months and with the application:
<ul><li>Gas, electricity,</li><li>Bank statemen</li></ul>	•	tor insurance certificate/home insurance certificate/tax certificate nk
• Social insuranc	e document o	r Revenue Commissioners document
A list of acceptable/u	nacceptable Ai	nti Money Laundering documents can be found on our website cantorfitzgerald.ie
PENSION PROVIDI	ER* ACCOU	NT SET UP CHECKLIST:
We have comple	ted Part B and	co-signed and dated Part C of the attached form.
We have comple	ted the CRS/F/	ATCA form. (ONLY if the pension IS a trust structure)
We have a pensi	on provider ac	count already in place and submitted Anti-Money Laundering documentation for
ALL authorised s	ignatories.	
We have attache	ed a DWT exen	nption form related to the product.
We have attache	ed SSAP Reven	ue Approval Letter and Trust Deed (where applicable).
*Professional Trustee in t Fund (ARF), PRSA Provi	the case of Tru der in the case	st Scheme, Qualifying Fund Manager (QFM) in the case of Approved Retirement of PRSA, Retirement Bond Provider in the case of Retirement Bond.
Fitz is o	gerald Ireland	rclays Bank details below for any Electronic Fund Transfers to your account in Cantor Ltd. Please do not transfer funds until your Cantor Fitzgerald Ireland Ltd. account I need an account number as a reference.
	nk Name:	Barclays Bank Ireland
Acc	ount Name:	Pershing Securities International Limited Client Asset Account – Hub Account
Sor	t Code:	990212
Acc	ount No:	45525315
	IFT Code:	BARCIE2D
IBA Pot	iN: erence:	IE10BARC99021245525315  Client Name and CFIL Client Reference Number (starting with DS)
	erence.	
DUE	BLIN: Canto ERICK: Canto	eted application and identification to: r Fitzgerald Ireland Ltd, Cantor Fitzgerald House, 23 St Stephen's Green, Dublin 2 r Fitzgerald Ireland Ltd, Crescent House, Hartstonge St., Limerick r Fitzgerald Ireland Ltd, 45 South Mall, Cork

# . RELEVANT SECTIONS MUST BE COMPLETED

PPS Number

Date of Birth

Nationality

Country of Residence

If your nationality is British please enter your NI number:

## **Pension – Intermediary Execution Only Account Opening Form**



Account Opening Form	Inngerala
Intermediary Cantor Fitzgerald Account Number Intermediary Firm Client Cantor Fitzgerald Account Number Type of Pension SSAP ARF PRB	DS DS PRSA
NEW CLIENT: Please complete ALL sections as directed EXISTING CLIENT: Please include your account referes since you last completed this form including contact  Part A: To be filled out by Beneficial Owner	nce above and complete sections 3(ii) & 7. If any details have changed
1. Beneficial Owner Details (PLEASE USE BLOC	CK CAPITALS)
Title Mr Mrs Ms Miss Othe  Surname  Forename(s)	Civil Status Married Single Separated  Divorced Widow(er) Civil Partnership  Spouse's/Civil Partner's Details  (if relevant)

Surname

Forename(s)

Date of Birth

2. Contact D	etails (PLEASE USE BLOCK CAPITALS)
Home Address	
Home No.	Mobile No.
Email*	Office No.
*This will be the e	mail address for account communications. An email address is required to open an account.

# RELEVANT SECTIONS MUST BE COMPLETED



Source of Wealth/Funds			
i) Please indicate how you accumulated. You can in	ur <u>overall wealth</u> was dicate more than one option.	(ii) Please indicate the source of f investment. You can indicate m	
Savings		Current Account	
Inheritance		Deposit Account	
Equity/Fund Investment		Transfer from other Investment/F	Pension Provider
Property Investment		Other: If other please specify	
Sale of Business			
Retirement Fund			
Redundancy			
Other: If other please sp	ecify		
nless you specify otherwise	you will receive cash dividends a dividends (where available) please		
Inless you specify otherwise you wish to receive stock o	dividends (where available) please		ITALS)
Juless you specify otherwise you wish to receive stock of the stock of the following was a person holder, beneficial owner of the following was a person holder, beneficial owner or the following was a person holder, beneficial owner or the following was a person holder, beneficial owner or the following was a person holder, beneficial owner or the following was a person holder.	rience Relevant to the Dewing sections must be complete an appropriate authorised on the account and rauthorised signatory. A group of	etick here  ecision Maker* (PLEASE USE BLOCK CAPeted in order for us to open an account fateness assessment, if required.  appointed to make decisions on behalf of the fateness are required.	for you. This information
Inless you specify otherwise you wish to receive stock of the Knowledge & Expension Warning: All of the following required by law to allow to allow to allow the following property of the following warning and the following the following the following the following the following warning the following the follo	rience Relevant to the Dowing sections must be complete an appropriate authorised on the account and reauthorised signatory. A group of the purposes of conducting the	etick here  ecision Maker* (PLEASE USE BLOCK CAPeted in order for us to open an account fateness assessment, if required.  appointed to make decisions on behalf of the of two or more natural persons are required e appropriateness assessment.	for you. This information ne account i.e. the account to designate one person
NARNING: All of the folks required by law to allow Decision Maker is a persor holder, beneficial owner of Knowledge & Experience for the select your previous process.	rience Relevant to the Dowing sections must be complete an appropriate authorised on the account and reauthorised signatory. A group of the purposes of conducting the four trading experience: (You continue to the purpose of the purpose of conducting the four trading experience: (You continue to the purpose of the purpose of conducting the four trading experience: (You continue to the purpose of the purpose of the purpose of conducting the four trading experience: (You continue to the purpose of t	etick here  etick	for you. This information he account i.e. the accour to designate one person
WARNING: All of the folious required by law to allow both the folious required by law to allow both the folious required by law to allow both the folious required by law to allow to allow the folious required by law to allow the foli	rience Relevant to the Dowing sections must be complete an appropriate authorised on the account and reauthorised signatory. A group of the purposes of conducting the	etick here  ecision Maker* (PLEASE USE BLOCK CAPeted in order for us to open an account fateness assessment, if required.  appointed to make decisions on behalf of the of two or more natural persons are required e appropriateness assessment.	for you. This information ne account i.e. the account to designate one person



	THESE	COLUMN	S ARE MA	NDATORY	THESE COLUMNS	ARE MANDATORY
INANCIAL 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)
quities						
Corporate Bonds						
Government Bonds						
nvestment Funds						
Structured Products						
Corporate Finance/ Inquoted Investments						
Derivatives CFD's, Options, Futures)						
lf you have selected NONE for ar NUMBER OF TRADES IN THE LAS		strument ex	xperience, yo	ou do not need to	o complete NUMBER OF \	YEARS EXPERIENCE and
) If you have answered '0' for ained your years experience?					art (ii) above, please ex	plain how you have
) Relevant Professional Qua	lification o	r Experien	ce			
Do you have a relevant profes	ssional qualif	ication?				Yes No
Please list qualification(s)						
Please list qualification(s)	. Do you work as an investment manager/advisor?  Yes No					
	nt manager/a	dvisor?				

5. Pension Details (P	LEASE USE BLOCK CAPITALS)
Registered Pension Name	
Pension Provider	DSPP
Pension Type Required	SSAP ARF PRSA Retirement Bond



<b>6. Bank Details</b> (PLEASE USE BLOCK CAPITALS)  These details are required so we can transfer monies electronically fro	m your Cantor account to you	ır pen	sion bank account.
Bank Name			
Bank Address			
Account Name			
IBAN*	BIC		
*Your IBAN includes your account number and sort code and is an international standard for identifying	ng bank accounts across national borders	.This is (	detailed on your bank statement.
Part C: Acknowledgment, Investment Form and Joint Mand	date for Opening/Contir	nuing	Execution Only
Pension Account			
7. Indicative Investment Details Advisor and Authorised Signatory). Indicative investment Orders will not have been lodged and your Cantor representative has confirmed the requ	be actioned until your accoun	by the t is su	e investor and signed by ccessfully opened, funds
A) Corporate Finance/Collective Investment (Private Equity Incl EIIS/Private Loan Notes/ Property Investments)			Amount to Invest
(Frivate Equity incl Elis/Frivate Loan Notes/ Froperty investments)			€
			€
B) Structured Products (Full capital protection at maturity, Partial capital protection at maturity)	<b>Product Options (if applic</b> ty, Kick Out Products and oth		
			€
			€
C) Open Ended Products (Full capital protection at maturity, Partial capital protection at maturity)	<b>Product Options (if applic</b> ty, Kick Out Products and oth		
			€
			€
D) Cantor Investment Funds	% of Amount	OR	€ Amount to Invest
	72 23 23 23 23 23 23 23 23 23 23 23 23 23		€
			€
			€
E) ETFs/ETCs/Trusts/Third Party Funds	% of Amount	OR	Amount to Invest €
			€
			€
			€
			Please continue to next page



In in	Indicative Investment Details CONTINUED dicative Investment Details (to be completed and signed by the investor vestment Orders will not be actioned until your account is successfully one confirmed the requested orders with you.			
F)	Shares/Bonds	% of Amount	OR	Amount to Invest
			€	ì
Ī				2
F				
G)	Certificate Sales			Number to be sold
F				
F				
IN	VESTMENT ADVISOR DECLARATION:			
	onfirm that I have provided financial advice to the client(s) above in restential risks involved, including the risk of total capital loss. I confirm		ave full	y explained all of the
i)		<u> </u>	sistent v	vith the investor's
ii)	I/We can confirm that I/we have given due consideration to the targ manufacturer KID document and are satisfied that the investor falls			the product brochure and
iii)	I have complied with legislative requirements as set out under Crimi 2010 & Criminal Justice Amendment Act 2013.	nal Justice (Money Launderin	ng and	Terrorist Financing) Act
iv)	Where an investor has been identified as potentially vulnerable (e.g.	over 60 years of age), I hav	e taken	the necessary precautions

### INVESTOR DECLARATION:

I declare that:

Advisor Firm Name

Advisor Name (Print)

**Advisor Signature:** 

- i) the above details are correct
- ii) I am over 18
- iii) I understand and accept that the Terms and Conditions of the product(s) set out in the brochure(s) are consistent with my risk profile and investment objectives

Date:

iv) I understand that the investment will not be deemed to have been made until the application has been accepted and that if accepted will commence on the issue date.

I hereby acknowledge, request and authorise you to:

- i) Place my capital investment in the product(s) issued by the issuer as detailed in the brochure(s).
- ii) Where I am investing through an authorised intermediary of Cantor and do not already have an account with Cantor Fitzgerald Ireland, to open an execution only account for the purposes of administering Structured Product only.
- iii) Should I wish to engage in trading or make any other investment I will need to complete supplementary documentation as requested by Cantor

By signing this application I am agreeing that Cantor Fitzgerald Ireland Ltd may use my information in the way described in this form and in the associated terms and conditions.

Please continue to next page



# 7. Investment Details CONTINUED Please see bank details on the front cover Indicative Investment Details (to be completed and signed by the investor and signed by Advisor and Authorised Signatory). Indicative investment Orders will not be actioned until your account is successfully opened, funds have been lodged and your Cantor representative has confirmed the requested orders with you. I declare that; I have received financial advice on this product. I fully understand all of the potential risks involved in this product, including the risk of total capital loss Beneficiary Signature Authorised Signatory Print Name Print Name Date Signed Date Signed Date Signed Date Signed

### 8. 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 have carefully read, acknowledge and understand the terms of the below listed documentation which I have been presented with and have had an opportunity to consider. I hereby agree that by signing this acknowledgment that I will be bound by all terms and conditions contained in the following documents:
  - 1. The Brochure or Information Memorandum pertaining to the Structured Product (if applicable)
  - 2. This Structured Product Application Form and Commitment Agreement (if required)
  - 3. Execution Only 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 in its entirety, and for which I now hereby apply.
- (c) The investment experience and information provided in this Account Opening Document is a complete and accurate record of all information relevant and necessary to allow Cantor to provide and Execution Only service to me.
- (d) I acknowledge that Cantor will arrange for a nominee account to be opened with Pershing Securities International Limited on my behalf.
- (e) I have been presented with and have had an opportunity to consider the **Client Asset Key Information Document** and I have carefully read, acknowledge and understand the arrangements Cantor have put in place for holding client assets and the risks associated with them.
- (f) We have been presented with a current rate card and we are aware that any changes to this will be updated to the Cantor Fitzgerald website for 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.

Please continue to next page



8. Acknowledgement CONTINUED	
Client Acceptance Beneficiary Signature	Authorised Signatory
Print Name	Print Name
Date Signed DD MM YY	Date Signed DD MM YY

### 9. Joint Mandate for Opening/Continuing Execution only Pension Account

As Professional Trustees in the case of Trust Scheme; Qualifying Fund Manager in the case of ARF, PRSA Provider in the case of PRSA, Retirement Bond Provider in the case of Retirement Bond [delete as appropriate], hereafter referred to as the 'Pension Provider' of the

[Insert name of Pension Scheme/ARF/PRSA/Retirement Bond] (the 'Account'), hereby appoint Cantor Fitzgerald Ireland Limited (the 'Company') as the Investment Manager to the Account.

The Pension Provider requests that you note the instructions below and act accordingly.

- (a) Authority to open a Securities dealing account
  - That an account or accounts be opened with Cantor Fitzgerald Ireland Limited at 23 Stephen's Green, Dublin 2 under the terms and conditions outlined in the foregoing Account Opening Document, the Terms and Conditions booklet and the conditions below.
- (b) Authority to Cantor Fitzgerald Ireland Limited

That the Company be authorised and instructed to undertake the following:

- Investment instructions
  - Subject to the Terms and Conditions booklet, Cantor will act on foot of investment instructions received from the Client and in accordance with the Part A of the application. The Pension Provider and Client acknowledge that it is the Pension Provider's responsibility to ensure:
  - i. that the Client invests in accordance with the rules which govern the Account;
  - ii. that the assets of the Account are managed in accordance with Revenue requirements and obligations under the Pensions Act 1990 (as amended) and any other applicable law or regulation.
- (c) 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.
- (d) To furnish the Company with relevant qualifying documentation.
  - The Company will be furnished with an up to date copy of the Trust Deed or relevant qualifying documentation
- (e) Contributions
  - Contributions into the Account will only be accepted if they are received from the Pension Provider or the registered administrator of the Pension Provider, where applicable.
- (f) Withdrawals
  - Cantor will permit withdrawals from the Account of the Client under the instruction of an Authorised Signatory of the Pension Provider and the signature of the Client. In the event of early retirement due to ill health or the death of the beneficiary, Cantor will liquidate the account and permit a withdrawal on the sole instruction of the Pension Provider. The Company will be furnished with an up to date copy of the Trust Deed/ qualifying documentation of the Account.
- (g) Authorised Signatory Lists
  - That the Pension Provider has previously completed a Pension Provider application for the Company with a list of the names of all Authorised Signatories for and on behalf of the Pension Provider of the Account and with specimens of their signatures and that the Company be notified immediately in writing signed by the Authorised Signatories 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.
- (h) To communicate resolutions to the Company

Please continue to next page

# RELEVANT SECTIONS MUST BE COMPLETED

### Pension – Intermediary Execution Only Account Opening Form



### 9. Joint Mandate for Opening/ Continuing Execution Only Pension Account continued

That these resolutions be communicated to the Company and shall constitute the Account Opening Document and shall remain in force until an amending resolution shall be passed and a copy of such resolutions certified by the Authorised Signatories shall be communicated to the Company.

- (i) 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.
- (j) Contract Notes
  - Contract notes related to the Account will be sent to the Client as outlined in the Account Opening Agreement. The Client acknowledges that copies of any contract notes will be sent to the Pension Provider upon request.
- (k) Account Information
  - The Client acknowledges that any portfolio information will be provided to the Pension Provider upon request.
- (I) Entry of resolutions in minute book
  - We certify that the above resolutions have been duly entered in the minute book and signed by the Authorised Signatories and are in accordance with the Trust Deed and or relevant qualifying documentation and are, at this date, in full force and effect.

BENEFICIARY SIGNATURE	AUTHORISED SIGNATORY
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

Cantor Fitzgerald Ireland Ltd is regulated by the Central Bank of Ireland and is a member firm of Euronext Dublin and the London Stock Exchange

### **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	n for FAICA and CRS (PLEASE	USE BLOCK CAPITALS)
	ON HOW TO COMPLETE THE PROPERTY OF THE PROPERT	
Please select the rel	evant account type, and comple	te Section 1(b), 2, 3, 4 (if applicable) and 5.
Corporate	Trust Charity	Institutional Pension (e.g. Trust Structure) Partnership
Other type of ent	ity (Please note legal structure):	
		not apply to your account type please complete the form as per your local tax
SECTION 1: Acco	ount Details	
1(a): Personal Detai	Is Please complete if applicable to v	your account 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(h): Entity Details	Please complete if applicable to you	r account type, based on the instructions noted above:
_	Trease complete if applicable to you	account type, based on the mistractions notice above.
Entity Name (Legal)		
Registered Address		
		Country:
SECTION 2: Decl	aration of Person or Entition	es Tax Residency All account types MUST complete
Name of Person/Entit		/( <u>List all</u> ) Tax ID Number (TIN) If TIN not available, please indicate reason
	ty's Classification Please comp	lete if applicable to your account type, as per the instructions at the start of
this form		
•	hoose one CRS classification and on e of the below options:	e FATCA classification within this section.
FATCA Classification	·	GIIN (if applicable)
Reporting Model		
Reporting Model		
(continued on following		
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# 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, pleat	se provide vour sponsor's name and sponsor's GIIN
me of the sponsoring Entity	provide your sponsor s name and sponsor s and
N number of the sponsoring Entity	
in that iber of the sponsoring thaty	
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)	tion 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	
Theave Horr Financial Entity other	

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



### 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.

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