

Discretionary Managed Service Pension Account Application Form

SSAP/PRB/PRSA/ARF - External Pension Provider

In order to establish and operate your account with us, we would ask you to please:

1. Complete the enclosed Application Form and provide the requested additional documents. For your convenience, we have attached a checklist below. Please contact your Cantor Relationship Manager for clarification or assistance if you are unsure. You may also wish to obtain independent advice prior to completing the form.
2. Consider your answers carefully. In providing a discretionary managed service, we naturally rely on the information you provide us.
3. Undertake a short Risk Tolerance Questionnaire via email which will be issued via a separate link.
4. Once you receive your client account number, please transfer funds electronically in advance of any purchase to our custodian Pershing Securities International Limited, quoting your Cantor client account number.

Euro Bank Details

Bank Name: Barclays Bank Ireland
Account Name: Pershing Securities International Limited Client Asset Account – Hub Account
Sort Code: 990212
Account No: 45525315
BIC: BARCIE2D
IBAN: IE10BARC99021245525315
Reference: Client Name and Cantor Client Account Number (starting with DS)

Please note that unfortunately any monies sent without your Cantor client account number will have to be returned to you.

ACCOUNT SET UP CHECKLIST:

- I/We have completed the attached application form in full and have signed and dated.
- I/We have completed the attached CRS/FATCA form and have signed and dated.
- I/We have attached a current (in date) copy of my ID (Passport/Driving License) certified by a Garda, solicitor, or Cantor member of staff.
- I/We have attached a certified bill/or original copy of a bill issued in the last 6 months with the same address as provided on the application form, being one of:
 - Gas, electricity, phone or motor/home insurance certificate, tax certificate OR
 - Social Insurance document or Revenue Commissioners document

Pension Provider Checklist*:

- We have completed the relevant Revenue DWT form
- We have a pension provider account already in place and submitted Anti-Money Laundering documentation for ALL authorised persons
- We have enclosed SSAP Revenue Approval Letter and Trust Deed (where applicable) A list of permissible Anti Money Laundering documents can also be found on our website cantorfitzgerald.ie

*Professional Trustee in the case of Trust Scheme, Qualifying Fund Manager (QFM) in the case of Approved Retirement Fund (ARF), PRSA Provider in the case of PRSA, Retirement Bond Provider in the case of Retirement Bond.

Queries/Advice Call your Financial Advisor or your Cantor Fitzgerald Relationship 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

Discretionary Managed Service

Pension Account Application Form



Part A: To be filled out by Beneficial Owner

1. Beneficial Owner Details (PLEASE USE BLOCK CAPITALS)

Title	Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Ms <input type="checkbox"/> Miss <input type="checkbox"/> Other <input type="text"/>	Civil Status	Married <input type="checkbox"/> Single <input type="checkbox"/> Separated <input type="checkbox"/> Divorced <input type="checkbox"/> Widow(er) <input type="checkbox"/> Civil Partnership <input type="checkbox"/>
Surname	<input type="text"/>	Spouse's/Civil Partner's Details (if relevant)	
Forename(s)	<input type="text"/>	Surname	<input type="text"/>
PPS Number	<input type="text"/>	Forename(s)	<input type="text"/>
Date of Birth	<input type="text"/> DD <input type="text"/> MM <input type="text"/> YY	Date of Birth	<input type="text"/> DD <input type="text"/> MM <input type="text"/> YY
Country of Residence	<input type="text"/>		
Nationality	<input type="text"/>		
If your nationality is British please enter your NI number:		<input type="text"/>	

2. Contact Details (PLEASE USE BLOCK CAPITALS)

Home Address	<input type="text"/> <input type="text"/>		
Home No.	<input type="text"/>	Mobile No.	<input type="text"/>
Email*	<input type="text"/>	Office No.	<input type="text"/>

**This will be the email address for account communications. An email address is required to open an account.*

4. Financial Background (PLEASE USE BLOCK CAPITALS)

Under this discretionary service we are required to assess Suitability and only recommend suitable products to you. Suitability is an assessment of your financial situation, knowledge and experience, investment objectives, risk profile and personal circumstances. This information ensures we only recommend products and services that are suitable to your needs and objectives. We would ask that you provide us with complete and as accurate as possible answers to enable us to provide investment advice and recommendations that are suitable to your personal circumstances. If matters change after your Cantor account is opened, we would ask you to inform us as soon as is practicable and before any additional advice is provided.

Regular Income (per annum)

Please complete ALL sections. Any incomplete will be assumed as "€0".

APPLICANT

Employment/Pension Income	€ <input type="text"/>
Property Income	€ <input type="text"/>
Investment Income	€ <input type="text"/>
Other Income	€ <input type="text"/>

Regular Commitments (per annum)

Pension	€ <input type="text"/>
Mortgage PPR	€ <input type="text"/>
Others (e.g. Loans)	€ <input type="text"/>

Occupation & Employment Capacity

Occupation	<input type="text"/>
Employment Capacity	<input type="checkbox"/> Self-employed / Director <input type="checkbox"/> Company Employee <input type="checkbox"/> Retired

Value of Personal Assets

Any incomplete will be assumed as €0.

Principal Private Residence (PPR)	€ <input type="text"/>
Mortgage on PPR	€ <input type="text"/>
Cash Deposits	€ <input type="text"/>
Other Investments	€ <input type="text"/>
Gross Value of Other Properties	€ <input type="text"/>
Total Debt on Other Properties/Investments	€ <input type="text"/>
Other Net Assets	€ <input type="text"/>
Pension Asset	€ <input type="text"/>

Please continue to next page

4. Financial Circumstance continued

Source of Wealth/Funds

Please indicate how your overall wealth was accumulated.

You can indicate more than one option.

- Personal Savings
- Inheritance
- Equity/Fund Investment
- Property Investment
- Sale of Business
- Pension Fund
- Redundancy
- Other: If other please specify:

Please indicate the source of your initial transfer to Cantor.

You can indicate more than one option.

- Bank Account
- Transfer from other Investment Provider
- Pension Fund
- Other: If other please specify:

5. Investment Objectives and Account Risk Profile

Anticipated Portfolio Details (Please answer all)

What is your anticipated total portfolio size

- €250,000 - €500,000
- €500,000 - €1,000,000
- €1,000,000 - €5,000,000
- €5,000,000 +

Investment Horizon for your proposed portfolio

- 1 - 3 years
- 3 - 5 years
- 5 - 10 years
- 10 - 15 years
- 15 - 20 years
- 20+ years

Annual Investment Income Requirement

Do you require regular predictable investment income?

Yes No

If you ticked yes above, please state the approximate annual investment income requirement from your Cantor account:

€

Which of the following best describes your investment objective

- Capital Growth only Mix of Investment Income with Capital Growth* Investment Income only*

*The Optimum strategies aim to reinvest dividends back into the portfolio. Regular income can be achieved through portfolio encashments.

Discretionary Managed Service

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6. Knowledge & Experience (PLEASE USE BLOCK CAPITALS)

Please indicate in what capacity or service level you gained any knowledge and experience in financial markets:

(You can select more than one option if applicable)

- Execution Only:** You made all the decisions without professional advice; only market information and updates
- Advisory:** You made all the decisions with the benefit of advice from a financial advisor
- Discretionary:** You agreed account parameters and allowed an investment advisor to make decisions on your behalf without reverting to you

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

None: You have no knowledge or experience investing in financial markets.

Limited You have some knowledge and experience of financial markets but limited actual trading history.

Good: You have reasonable knowledge and experience of financial markets and have traded over a number of years.

Extensive: You have good knowledge and experience and have traded consistently over the last number of years.

FINANCIAL INSTRUMENTS	KNOWLEDGE				EXPERIENCE	
	NONE	LIMITED	GOOD	EXTENSIVE	EXPERIENCE (No of Years)	TYPICAL NUMBER OF TRADES PER ANNUM
Equities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Bonds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Funds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Exchange Traded Funds (ETFs)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Structured Products	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Corporate Finance Products	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
CFDs or Other Derivatives	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>

If you have indicated Limited/Good/Extensive Knowledge and Experience but have no history of transacting, please indicate how you have attained this knowledge/attained your years experience?

Relevant Professional Qualification or Experience

Do you have a relevant professional qualification? Yes No

Please list qualification(s)

Do you work as investment manager/advisor OR in Financial Services? Yes No

If yes, please provide your title

Are you a member of a relevant financial services professional body? ('i.e. ACOI, LIA, IOB, etc.) Yes No

If yes, please list the professional body

7. Further Objectives & Restrictions (PLEASE USE BLOCK CAPITALS)

Please consider your answers carefully as this will allow us to tailor your portfolio to your specific Sustainability Preferences where available. Please note that if you do not have any sustainability preferences, you do not need to answer the remaining questions. It is important to note that the percentages provided for question 2 and 3 are cumulative and therefore the total of both answers cannot be greater than 100%.

1. Do you have sustainability preferences for your investments?

- No, I am only interested in the financial aspects of the investment. (No further answers are required)
- I don't know. I would need to give sustainability preferences more consideration. (Please consult with your Cantor Relationship Manager or Financial Advisor)
- Yes, I am interested in the sustainability attributes as well as the financial aspects of investments (Please proceed to Questions 2 – 4)

2. To what minimum extent do you want Environmentally Sustainable investments (i.e. make a substantial contribution towards an environmental objective) to form part of our recommendations to you and therefore your portfolio?

Generally speaking, for a business or business activity or product to be considered environmentally sustainable, it must:

- Contribute substantially to one or more of certain specified environmental objectives;
- Not significantly harm any of those environmental objectives
- Be carried out in compliance with certain minimum social safeguards; and
- Comply with technical screening criteria established by the EU Commission (the 'EU Taxonomy')

Please choose a percentage band: 0 - 25% 26% - 50% 51% - 75% 76% - 100%

3. To what minimum extent do you want Sustainable Investments to form part of our recommendations to you and therefore your portfolio?

By Sustainable Investments we mean an investment in business that contributes to an environmental and/or social objective. This objective should be measurable, for example, a key resource efficiency indicator on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions. It could measure the impact on biodiversity and the circular economy. It could be an investment in a business that contributes to a social objective, for example tackling inequality or that fosters social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities. This is provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

Please choose a percentage band: 0 - 25% 26% - 50% 51% - 75% 76% - 100%

4. To what extent are the below grouped Principal Adverse Impact important to you?

A Principal Adverse Impact (PAI) is the impact of your investment decision; by reference to the business activity of or the actual entity which issues the security which you purchase. A PAI refers to the negative effect on sustainability factors, such as environmental, social and employee concerns, respect for human rights, anti-corruption, and anti-bribery matters by an entity in which you invest, by virtue of its direct actions and such effect therefore in part facilitated by your investment.

A. Climate Change	B. Environmental	C. Social And Employee Matters	D. Governance
Greenhouse Gas Emissions	Activities that negatively affect bio-diversity-sensitive areas	Adherence to the UN Global Compact	Respect for Human Rights
Carbon Footprint	Emissions to Water	Unadjusted Gender Pay Gap	Anti-Corruption Matters
Greenhouse Gas Intensity	Hazardous Waste and radioactive waste ratio	Board Gender Diversity	Anti-Bribery Matters
Exposure to Companies active in the fossil fuel sector		Exposure to Controversial Weapons	

Please continue to next page

7. Further Objectives & Restrictions (PLEASE USE BLOCK CAPITALS) continued

A. To what extent are Climate Change Principal Adverse Impacts Important to You?

Not Important Maybe Important Somewhat Important Important Very Important

B. To what extent are Environmental Principal Adverse Impacts Important to You?

Not Important Maybe Important Somewhat Important Important Very Important

C. To What Extent are Social and Employee Principal Adverse Impacts Important To You?

Not Important Maybe Important Somewhat Important Important Very Important

D. To What Extent are Governance Principal Adverse Impacts Important To You?

Not Important Maybe Important Somewhat Important Important Very Important

Note: Please notify us as soon as possible of any material change in any information given above.

8. Target Market and Publications

Your Stated Investment Interests and Our Publications

You would like to receive the publications ticked below from our publication list and are interested in learning more about or reviewing or considering the investment types covered within these selected publications.

- Daily Market Updates:** Equity, Bond, and Macro Economic developments
- Weekly Trader:** Financial Market outlook and Equity/ETF and Bond reviews
- Monthly Talking Points Newsletter:** The latest on our services and products including structured products, funds, wealth management services and products
- Structured Products:** Details on our latest capital guaranteed or contingent capital (at risk) products
- Corporate Finance Investments:** Details on our EIS, Loan Note, and Private Equity products
- Investment Webinars:** Periodic webinars regarding our products

9. Further Information/Special Requirements

Cantor will endeavour to accommodate the needs of clients who may have certain requirements or vulnerabilities. This is to ensure we provide an appropriate level of care to you.

Please inform us if there is any additional information you would like us to consider in order to better service you.

12. Acknowledgement Continued

- (h) We have been presented with and have had an opportunity to consider the **Client Asset Key Information Document** and we have carefully read, acknowledge and understand the arrangements Cantor has put in place for holding client assets and the risks associated with them.
- (i) 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.
- (j) 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.

BENEFICIARY SIGNATURE

Print Name

Date Signed

AUTHORISED SIGNATORY

Print Name

Date Signed

13. Joint Mandate for Opening/Continuing Discretionary Pension Account

As Professional Trustees in the case of Trust Scheme; Qualifying Fund Manager in the case of ARF/ AMRF, 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/AMRF/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 75 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 Part A of the application. The Pension Provider and Client acknowledge that it is the Pension Provider's responsibility to ensure:

- that the Client invests in accordance with the rules which govern the Account;
- 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.

13. Joint Mandate for Opening/Continuing Discretionary Pension Account continued

(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

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.

(l) 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

Print Name

Date Signed

AUTHORISED SIGNATORY

Print Name

Date Signed

How we use your Personal Information

We collect your personal information to conduct your account opening process and to manage your account. We process your data in line with our privacy policy. For further information outlining the purposes for which personal data is collected, used, disclosed, how long it is kept, and the legal basis for processing your data, please visit <https://cantorfitzgerald.ie/privacy/>

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.

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

SECTION 1: Entity Details

Legal Pension Name

Registered Address

Country:

SECTION 2: Declaration of Tax Residency

Pension Name	Country of Tax Residency(List all)	Tax ID Number (TIN)	If TIN not available, please indicate reason
<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>
<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>

SECTION 3: Entity's Classification

Please complete if applicable to your account type, as per the instructions at the start of this form

You are required to choose one CRS classification and one FATCA classification within this section.
 You MUST choose one of the below options:

FATCA Classification

- Reporting Model 1 FFI
- Reporting Model 2 FFI
- 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:

GIIN (if applicable)

<input style="width: 100%;" type="text"/>
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If the GIIN provided above is issued in the name of your sponsor, please provide your sponsor's name and sponsor's GIIN

Name of the sponsoring Entity

GIIN number of the sponsoring Entity

(continued on following page)

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

You MUST choose one of the below options:

CRS Classification

- Financial Institution other than investment entity (custodial institution, depository institution/specified insurance company)
- Financial Institution non-reporting according to local jurisdiction legislation where you are a resident
- Investment Entity with Tax Residence in a non-participating jurisdiction and managed by another FI
(also complete Section 4 for Controlling Persons)
- Passive Non-Financial Entity **(also complete Section 4 for Controlling Persons)**
- Active Non-Financial Entity which is a Government/Central Bank/International Organization
- Active Non-Financial Entity (corporation that is publically traded or an affiliate of a publicly traded corporation)
- Active Non-Financial Entity-other
- Other investment entity

You can find further definitions on the different classification on our CRS/FATCA Appendix accessible at cantorfitzgerald.ie

SECTION 4: Declaration and Undertakings

- (a) I/We declare that all statements made in this declaration are, to the best of my/our knowledge and belief, correct and complete.
- (b) I/We 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/We certify that I/we am/are the Account Holder (or am/are 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/we understand that I/we am/are 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

AUTHORISED SIGNATORY 1

Print Name

Date Signed

AUTHORISED SIGNATORY 2

Print Name

Date Signed

CLIENT ASSETS KEY INFORMATION DOCUMENT

1. Introduction

As you are aware when Cantor Fitzgerald Ireland Ltd (“CFIL” or the “firm”) provides investment 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 internal 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:

- (i) 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)

- Known service levels for the institution (where we have past experience with the institution)
- Whether the institution is independent of the firm.
- 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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Cantor Fitzgerald Ireland Ltd is regulated by the Central Bank of Ireland and is a member firm of the Irish Stock Exchange and the London Stock Exchange.