

Cantor Fitzgerald Ireland Ltd ("Cantor") Pension – Intermediary Execution Only Account Opening Form

SSAP/ARF/PRI	B/PRSA CLIENT	SET UP CHECKLIST:
I have comp to do so.	bleted Part A, Part (C section 7 and signed and dated in all places where the beneficial owner is required
I have comp	leted the CRS/FAT	CA form. (ONLY if the pension is NOT a trust structure)
	hed a copy of my I re it is in date.	D (Passport/Drivers Licence) certified by a Garda, Solicitor or Cantor member of staff -
same addre		
	ricity, pnone or mo ement from any ba	tor insurance certificate/home insurance certificate/tax certificate nk
		r Revenue Commissioners document
A list of acceptal	ble/unacceptable A	nti Money Laundering documents can be found on our website cantorfitzgerald.ie
PENSION PRO	VIDER* ACCOU	NT SET UP CHECKLIST:
We have co	mpleted Part B and	l co-signed and dated Part C of the attached form.
		ATCA form. (<u>ONLY if the pension IS a trust structure</u>)
	•	count already in place and submitted Anti-Money Laundering documentation for
	sed signatories.	
We have at	tached a DWT exer	nption form related to the product.
We have at	tached SSAP Reven	ue Approval Letter and Trust Deed (where applicable).
*Professional Truste Fund (ARF), PRSA	e in the case of Tru Provider in the case	ist Scheme, Qualifying Fund Manager (QFM) in the case of Approved Retirement e of PRSA, Retirement Bond Provider in the case of Retirement Bond.
Payment Details	Fitzgerald Ireland is open as you wi	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 II need an account number as a reference.
	Euro Bank Deta	
	Bank Name:	Barclays Bank Ireland Pershing Securities International Limited Client Asset Account – Hub Account
	Sort Code:	990212
	Account No:	45525315
	SWIFT Code:	BARCIE2D
	IBAN:	IE10BARC99021245525315
	Reference:	Client Name and CFIL Client Reference Number (starting with DS)
Post/Delivery	DUBLIN: Canto LIMERICK: Canto	eted application and identification to: or Fitzgerald Ireland Ltd, Cantor Fitzgerald House, 23 St Stephen's Green, Dublin 2 or Fitzgerald Ireland Ltd, Crescent House, Hartstonge St., Limerick or Fitzgerald Ireland Ltd, 45 South Mall, Cork

www.cantorfitzgerald.ie



Intermediary Cantor Fitzgerald Account Number	DS	
Intermediary Firm		
Client Cantor Fitzgerald Account Number	DS	
Type of Pension SSAP ARF PRB	PRSA	

<u>NEW CLIENT</u>: Please complete ALL sections as directed.

EXISTING CLIENT: Please include your account reference above and complete sections 3(ii) & 7. If any details have changed since you last completed this form including contact details please complete the form in full.

Part A: To be filled out by Beneficial Owner

1. Beneficial Owner Details (please use block capitals)								
Title Mr Mrs	Ms Miss Other		Married Single Separated Divorced Widow(er) Civil Partnership					
Surname Forename(s)		Spouse's/Civ (if relevant)	il Partner's Details					
PPS Number		Surname						
Date of Birth	DD MM YY	Forename(s)						
Country of Residence		Date of Birth	DD MM YY					
Nationality								
If your nationality is British plea	ase enter your NI number:							

2. Contact Details (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.



3. Source of Wealth/Funds (PLEASE USE BLOCK CAPITALS)	
 Source of Wealth/Funds (i) Please indicate how your <u>overall wealth</u> was accumulated. You can indicate more than one option. 	(ii) Please indicate the source of funds provided for this investment. You can indicate more than one option.
Savings	Current Account
Inheritance	Deposit Account
Equity/Fund Investment	Transfer from other Investment/Pension Provider
Property Investment	Other: If other please specify
Sale of Business	
Retirement Fund	
Redundancy	
Other: If other please specify	
Dividends Unless you specify otherwise you will receive cash dividends and in	·
If you wish to receive stock dividends (where available) please tick h	nere

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

WARNING: All of the following sections must be completed in order for us to open an account for you. This information is required by law to allow us to complete an appropriateness assessment, if required.

*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 appropriateness assessment.

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

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

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 i) Please indicate your invest asic: Have some knowledge but iood: Have knowledge and have 	t limited trac	ding history	<i>ı</i> .	the following	Financial Instruments	:
xtensive: Have knowledge and			-	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)						
*If you have selected NONE for an NUMBER OF TRADES IN THE LAS		strument ex	kperience, yc	ou do not need to	o complete NUMBER OF `	YEARS EXPERIENCE and
i) If you have answered '0' for tained your years experience?	NUMBER O				art (ii) above, please ex	plain how you have
v) Relevant Professional Qua	lification o	r Experien	ce			
Do you have a relevant profes	sional qualif	ication?				Yes 📃 No 🗌
Please list qualification(s)						
Do you work as an investmen	t manager/a	dvisor?				Yes 📃 No 🗖
Are you a member of a profe	ssional body	? e.g. ACC	I, LIA, IIB, C	hartered Accou	intants Ireland etc.	Yes No

Part B: To be completed by the Pension Provider

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

C O M P L E T E D

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MUST

RELEVANT SECTIONS

ALL



6. Bank Details (PLEASE USE BLOCK CAPITALS) These details are required so we can transfer monies electronically from your Cantor account	to your pe	nsion bank account.
Bank Name Bank Address		
Account Name		
IBAN* BIC	· · · · · ·	detailed on your bank statement.
art C: Acknowledgment, Investment Form and Joint Mandate for Opening/C Pension Account	ontinuin	g Execution Only
7. Indicative Investment Details Indicative Investment Details (to be completed and s Advisor and Authorised Signatory). Indicative investment Orders will not be actioned until your a have been lodged and your Cantor representative has confirmed the requested orders with you.	igned by th account is si	e investor and signed by accessfully opened, funds
A) Corporate Finance/Collective Investment (Private Equity Incl EIIS/Private Loan Notes/ Property Investments)		Amount to Invest
		€
		€
B) Structured Products Product Options (if a (Full capital protection at maturity, Partial capital protection at maturity, Kick Out Products ar		
		€
		€
C) Open Ended Products Product Options (if a (Full capital protection at maturity, Partial capital protection at maturity, Kick Out Products ar		
		quivalent Notes of Bonds).
		€
		[]
		€
D) Cantor Investment Funds	nt OF	€ € € Amount to Invest
	nt OF	€ € € Amount to Invest
	nt OF	€ € • • • • • • • •
Image: Solution of Amount Image: Solu		 € € Amount to Invest € € €
		 € € Amount to Invest € € €
Image: Solution of Amount Image: Solu		 € € Amount to Invest € € € € Amount to Invest
Image: Solution of Amount Image: Solu		 € € Amount to Invest € € € Amount to Invest €



7. Indicative Investment Details CONTINUED

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.

F) Shares/Bonds	% of Amount	OR	Amount to Invest
			€
			€
] [€
			€
G) Certificate Sales			Number to be sold
] [
] [

INVESTMENT ADVISOR DECLARATION:

I confirm that I have provided financial advice to the client(s) above in relation to this product and have fully explained all of the potential risks involved, including the risk of total capital loss. I confirm the following:

- Having conducted a full review of this investor's financial circumstances, that this product is consistent with the investor's i) investment objectives and risk appetite.
- ii) I/We can confirm that I/we have given due consideration to the target market assessment as outlined in the product brochure and manufacturer KID document and are satisfied that the investor falls within the positive target market.
- iii) I have complied with legislative requirements as set out under Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 & Criminal Justice Amendment Act 2013.
- iv) Where an investor has been identified as potentially vulnerable (e.g. over 60 years of age), I have taken the necessary precautions to protect the investor in this regard.

Advisor Firm Name	
Advisor Name (Print)	
Advisor Signature:	Date: DD MM YY
INVESTOR DECLARAT	ION:

I declare that:

- 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
- 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.



7.	Investment	Details	CONTINUED	Please see ban	k details o	on the	front	cov
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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 DD MM YY	Date Signed DD MM YY

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.



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



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 for FATCA and CRS (PLEASE USE BLOCK CAPITALS)
INSTRUCTIONS ON HOW TO COMPLETE THIS FORM: Please select the relevant account type and complete Section 1(a), 2 and 5. Individual Joint ARF AMRF Cantor PRB Cantor PRSA Image: Cantor PRSA Image: Cantor PRSA
Please select the relevant account type, and complete Section 1(b), 2, 3, 4 (if applicable) and 5.
Corporate Trust Charity Institutional Pension (e.g. Trust Structure) Partnership
Other type of entity (Please note legal structure):
PLEASE NOTE: If you believe the above instruction does not apply to your account type please complete the form as per your local tax advice.
SECTION 1: Account Details
1(a): Personal Details Please complete if applicable to your account type, based on the instructions noted above:
Person 1 Person 2
Title Mr Mrs Ms Other
Surname Surname
Forename(s) Forename(s)
Residential Residential Address
1(b): Entity Details Please complete if applicable to your account type, based on the instructions noted above:
Entity Name (Legal)
Registered Address
Country:
SECTION 2: Declaration of Person or Entities Tax Residency All account types MUST complete
Name of Person/Entity Country of Tax Residency(List all) Tax ID Number (TIN) If TIN not available, please indicate reason
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 GIIN (if applicable)
Reporting Model 1 FFI
Reporting Model 2 FFI
(continued on following page)

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CRS/FATCA Individual/Entity Self-Certification



Self-Certification for FATCA and CRS (PLEASE USE BLOCK C	APITALS)			
_				
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:				
If the GIIN provided above is issued in the name of your sponsor, please provide your sponsor's name and sponsor's GIIN				
GIIN number of the sponsoring Entity				
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 jurisdic	tion and managed by another FI			
	(also complete Section 4 for Controlling Persons)			
Passive Non-Financial Entity (also complete Section 4 for Contro	olling Persons)			
Active Non-Financial Entity which is a Government/Central Bank/In	ternational 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 C	KS/FAICA Appendix accessible at cantorfitzgerald.ie			



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

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

*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

BE COMPLETED



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)
Print Name	Print Name
Print Name Date Signed DD MM YY	Print Name Date Signed DD MM YY

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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.



CLIENT ASSETS KEY INFORMATION DOCUMENT

1. Introduction

When Cantor Fitzgerald Ireland Ltd ("CFIL" or the "firm") provides investment services to you as our client under our terms of business, we have a 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, Client Asset Requirements, of the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Investment Firms) Regulations 2023 (SI No. 10 of 2023) and Schedule 3 Safeguarding Client Financial Instruments and Funds, EU MiFIR 2017. In addition, the CBI has issued a Guidance Note on the Central Bank Client Assets Requirements. 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 requirements require CFIL to provide retail clients 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 6 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 riskbased approach is adopted in safeguarding your assets.

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



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; unless such money relates exclusively to an activity which is not a regulated financial service. 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.
- c) A cheque or other payable order received from the client is not honoured by the paying institution; and
- d) Funds are due and payable to CFIL by the client in the ordinary course of business, including fees and commissions.
- e) A decision has been made to utilise the funds for the purpose of a non-regulated investment. The point at which they are transferred to the Non-regulated asset is when they must be removed from the Client Asset Bank account.

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.
- 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.

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) To 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.



Product / Service	In scope of Client Asset Requirements
Wealth Management	Yes
Custody of Client Financial Instruments	Yes
Holding of Client Funds	Yes
Administration of Pension Accounts	No
Investment in Private Equity and Direct Property	No – These assets are not deemed 'transferrable securities' as defined in MiFID and are therefore not regulated and must be held separate from client assets
Holding of cash relating to Private Equity and Direct Property Investments	No – this 'other money' as defined in the CAR is associated with an activity that is deemed unregulated.

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.

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 Requirements.

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 holding the assets.

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

5.1 Client Funds:

Funds received are lodged to an omnibus Client Asset Account with an eligible bank or credit institution. This means that a number of clients' 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 omnibus account. We refer to section 6 regarding the risks associated with omnibus 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.

When funds, which include 'other money' not qualifying as client funds, is deposited to PSIL's Client Asset Account the 'other money' is promptly transferred post confirmation of same to a non-client asset bank 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 CBI Client Asset 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 Asset Requirements applicable may differ to those applicable within this state.
- (ii) The Investor Compensation scheme in operation in Ireland will not apply to any default by the foreign custodian.

PSIL hold client assets on an omnibus 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 6 regarding the risks associated with omnibus 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 clients' 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 Asset 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 Ireland Limited. The principal risks associated with holding your assets in this manner include exposures relating to:

- Loss of Client 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 omnibus accounts: Under an omnibus 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 sub custodians 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 Ireland Limited endeavours to minimise these risks by confirming that PSIL do the following:

- Undertake risk assessments, as set out below, of institutions with whom your assets are held.
- Have written confirmation, in line with the Requirements, 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 funds held for clients as per their records with the client funds 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:

- (i) The institution's credit rating (where available)
- (ii) Known service levels for the institution (where we have past experience with the institution)
- (iii) Whether the institution is independent of the firm.
- (iv) 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 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 Requirements, will be obtained from the institution. No client assets will be lodged prior to receipt of the facilities letter.

7. Unregulated activity

Assets held in connection with an activity that is not a regulated financial service:

- a. Are held separately from client assets.
- b. Will not be protected as client assets; and
- c. Will not be covered under the Investor Compensation Scheme.

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December 2024