



Terms of Business Document

Version 5.0 – 22nd September 2021

These terms of business set out the basis upon which Symmetry Financial Management Ltd will provide Financial Advisory, Mortgage and Insurance services to you. They also contain details of our regulatory and statutory obligations and the respective duties of both our firm and you in relation to such services. This is an important document – please read carefully and if you have any questions please contact us. If there are any material changes to the information in this document, you will be issued with a revised copy as soon as possible.

These Terms of Business are valid from 22/09/2021 until further notice.

Authorised Status

Symmetry Financial Management Ltd is regulated by the Central Bank of Ireland as an Investment Business Firm and Deposit Broker under Section 10 the Investment Intermediaries Act 1995 (as amended), registered as an Insurance Intermediary under the European Union (Insurance Distribution) Regulations 2018, and as a Mortgage Intermediary & Mortgage Credit Intermediary pursuant to Section 31 (10) & the European Union (Consumer Mortgage Credit Agreements) Regulations 2016 and section 151A (1) and the Consumer Credit Act, 1995.

Copies of our statements of Authorised Status from the Central Bank of Ireland are available on request. Alternatively, the Central Bank of Ireland holds registers of regulated firms which can be viewed on their website www.centralbank.ie. Alternatively, you may contact the Central Bank of Ireland on 1890 777 777. Our registration number is C174844.

Statutory Codes

Symmetry Financial Management Ltd is subject to and complies with the Consumer Protection Code 2012, Minimum Competency Code 2017, The Handbook of Prudential Requirements for Investment Intermediaries 2014, The Fitness and Probity Standards 2014. These codes offer protection to consumers and can be found on the Central Bank's website www.centralbank.ie

Our Services

Symmetry Financial Management is a member of Brokers Ireland.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Life Assurance, Pensions, Mortgages and Investments. A full list of insurers, banks and product producers with which we deal is available on request.

Symmetry Finance Ltd acts as a **Broker** which means that:

1. the principal regulated activities of the firm are provided on the basis of a fair analysis of the market; and
2. you have the option to pay in full for our services by means of a fee.

Symmetry Financial Management Ltd provides advice on a fair analysis basis in relation to Financial Services including Insurance Policies, Tracker Bonds, Investments, Mortgages, Pensions and PRSAs. This means we conduct broad based research across the market to find the most suitable product for you irrespective of whether we hold an agency with particular providers. Fair analysis of the market means that our firm provides its services on the basis of a sufficiently large number of contracts and product producers available on the market to enable our firm to make a recommendation, in accordance with professional criteria, regarding which contract would be adequate to meet our client's consumer needs.

Our firm does not have a 'tied' relationship with any institution. We offer our clients an extensive choice of suitable products that best serve their needs and circumstances as we hold agencies with most of the life companies in Ireland. We also hold agencies with a wide array of investment and pension product providers, ensuring we can give you a well-informed view on the different options available at all times. On receipt of your instructions we will transmit orders on your behalf to one or more product producers with whom we hold a written appointment (a list of which is available on request).

We offer advice on a **Limited analysis basis** in relation to Deposits. The scope of our research and advice will be limited to the product producers we hold an appointment with based on which we will make a professional recommendation to best serve your needs and circumstances. On receipt of your instructions we will transmit orders on your behalf to one or more product producers with whom we hold a written appointment (a list of which is available on request).

Life, Pension & Investments

Symmetry Financial Management Ltd provide Life Assurance and Pension Products on a fair analysis basis. We will provide assistance to you for any queries you may have in relation to these policies, or in the event of a claim during the life of the policies, and we will explain to you the various restrictions, conditions and exclusions attached to your policy. However, it is your responsibility to read the policy documents, literature and brochures to ensure that you understand the nature of the policy cover, particularly in relation to Income Protection and Serious Illness Policies.

Specifically, on the subject of Income Protection Cover, it is our policy to explain to you:

- a) The meaning of disability as defined in the policy;
- b) The benefits available under the policy;
- c) The general exclusions that apply to the policy; and
- d) The reductions applied to the benefit where there are disability payments from other sources

For a Serious Illness Policy, we will explain clearly to you the restrictions, conditions and general exclusions that attach to that policy.

Investments & Deposits

Symmetry Financial Management Ltd provide Investment Products on a fair analysis basis. We provide professional advice in relation to Deposit Options and can arrange Deposits with the Deposit Provider(s) with whom we have a written appointment.

We can provide advice on Investments and Structured Products in the event of considering an Investment or Reinvestment; we will outline the various options available to you, particularly in relation to the nature of the Investment risk and/or other restrictions.

Mortgages

Symmetry Financial Management Ltd provides Mortgage advice on a fair analysis basis. Through the lenders or undertakings with which we hold an agency we can provide advice on and arrange Mortgage Products such as Fixed Rate Loans, Variable Rate Mortgages, capital & interest mortgages, interest only mortgages, endowment mortgages, pension mortgages and residential investment property.

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

Disclosure of Information

It is your responsibility to provide complete and accurate information for insurers when arranging a policy. Failure to disclose any material information to your insurers may invalidate your cover and could mean that all or part of a claim will not be paid. It is also your responsibility to provide complete and accurate information to Financial Institutions in order for them to conduct a proper credit worthiness assessment when arranging Mortgage finance. If you are unsure as to your disclosure requirements, please discuss this with us.

Complex Investments Instruments (MiFID*) & Periodic Assessment of Suitability

Where we provide an investment service that involves a periodic suitability assessments, we will provide you with a report annually outlining any changes in the services or instruments involved &/or the circumstances of you, our client. *Markets in Financial Instruments Directive

Schedule of Fees & Charges

Remuneration Financial Services

Symmetry Financial Management Ltd will be remunerated for business services we offer you our client by one or a combination of the following means:

- By commission earned from Insurers and Product Producers to whom orders are transmitted, for new business and/or based on quality of business introduced. Summary details of these payments will be included in a product information document which you will receive both from us and the Insurer/Product Producer.
and/or
- By the Investment Managers as a shared management fee deducted from your investment.
and/or
- By you directly in the form of a fee which we will discuss and agree in advance of all transactions
and/or
- You also have the option to pay for the services we provide by way of a professional fee or by way of a combination of commissions and fees which we will discuss and agree in advance of all transactions.

Where we receive recurring commission, this forms part of the remuneration for initial advice provided. We reserve the right to charge additional fees if the number of hours relating to on-going advice/assistance exceeds 5 hours.

Fee Table for Advisory and Financial Planning Services

Fees may be charged on an hourly rate and/or on a project basis. This will always be discussed and agreed in writing in advance of any work being undertaken on a client's behalf.

Professional Advisor	Professional Fee (Hourly Rate Ex VAT)
Directors	€250.00
Accounts Executive/ Qualified Financial Advisers	€175.00
Support Staff	€100.00

- Additional fees may be payable for complex cases to reflect expertise or urgency. The basic hourly rate as outlined may be subject to change should these additional factors arise. This will always be discussed and agreed in advance of any work taking place.
- Professional Fees are non-refundable in the event that a policy is cancelled.

Remuneration Mortgage Services

- We may receive commission on Mortgage products of up to 1% of the mortgage amount (or maximum payable). If we secure a mortgage loan offer for you, and you do not proceed with the loan, there will be a charge for our services – currently this amount is €250 but is liable to change from time to time.

Details of our mortgage commission levels payable from different creditors whom we place business with are available on request. If you wish we can charge a fee of 1% directly and we will refund any payments received from lenders.

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

Last Minute AVC Service

We can arrange a Last Minute AVC, where the client makes a lump sum contribution into a PRSA AVC in the preceding month to their retirement. No commission will apply on this contribution as we charge a flat fee for the advice instead. The once off fee for this service is €400.00 + VAT.

Regular Reviews

It is in your best interests that you review, on a regular basis, the products which we have arranged for you. As your circumstances change, your needs will change. You must advise us of those changes and request a review of the relevant policy so that we can ensure that you are provided with up to date advice and products best suited to your needs. Failure to contact us in relation to changes in your circumstances or failure to request a review, may result in you having insufficient insurance cover and/or inappropriate investments.

Receipts

Our firm will issue a receipt for each negotiable or non-negotiable instrument or payment received pursuant to Section 3.5 of the Consumer Protection Code 2012.

Conflicts of interest

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

Default on payments by clients

Our firm will exercise its legal rights to receive payments due to it from clients for services provided. Product producers may withdraw benefits or cover in the event of default on payments due under policies of insurance arranged for you. We would refer you to policy documents or product terms for the details of such provisions.

Cancellation

You, the customer can cancel your policy at any time by giving notice in writing subject to the terms and conditions of the applicable policy.

Complaints

We ask that you make any complaint against our firm, relating to services provided by us, preferably in writing however, verbal complaints will also be accepted. We will acknowledge your complaint within 5 business days and we will fully investigate it. A written update will be issued to you every 20 days by a nominated individual within our firm. A comprehensive response to your complaint will be issued within 8 weeks of receipt of your initial complaint. You are entitled to refer the matter to the Office of the Financial Services & Pensions Ombudsman (01-5677000 or info@fspo.ie). A full copy of our complaints procedure is available on request.

Professional Indemnity Insurance Cover

We have Professional Indemnity Insurance Cover to the levels of €1.25m per claim, with €1.85m in aggregate, as required under the E.U. Insurance Mediation Directive.

Compensation Scheme

We are members of the Investor Compensation Scheme established under section 30 of the Investor Compensation Act 1998. The Investor Compensation Act, 1998 provides for the establishment of a compensation scheme and the payment, in certain circumstances, of compensation to certain clients (known as eligible investors) of authorised investment firms, as defined in that Act. The Investor Compensation Company Ltd. (ICCL) was established under the 1998 Act to operate such a compensation scheme and our firm is a member of this scheme.

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

A right to compensation will arise only:

- If the client is an eligible investor as defined in the Act; and
- if it transpires that the firm is not in a position to return client money or investment instruments owned or belonging to the clients of the firm; and
- To the extent that the client's loss is recognised for the purposes of the Act.

Where the entitlement to compensation is established, the compensation payable will be the lesser of:

- 90% of the amount of the client's loss which is recognised for the purposes of the Investor Compensation Act, 1998 or
- Compensation of up to €20,000.

Governing Law and Language

The laws of Ireland form the basis for establishing relations between you and our firm. All contracts, terms, conditions and communications relating to any policies you may enter into with this firm will be in English.

Anti - Money Laundering/Countering the Financing of Terrorism

Our firm reserves the right to request any facts about a client which it reasonably believes it needs to know in order to comply with the Criminal Justice (Money Laundering and Terrorist Financing) (Amended) Act 2013.

Data Protection

Symmetry Financial Management Ltd complies with the requirements of the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018.. We collect your personal details on a 'need to know' basis in order to provide the highest standard of service to you. We take great care with the information provided; taking steps to keep it secure and to ensure it is used only for legitimate purposes. The data which you provide to us will be held on a computer database and paper files for the purpose of arranging transactions on your behalf.

In order to provide a seamless service to you, Symmetry Financial Management Ltd may transfer any data we have received from you and any data we hold on you to our Business Partners located in Ireland. You have a right of access to and the right to rectify the data concerning you held by Symmetry Financial Management Ltd. You also have the right to request the transfer of your personal data to a new provider. Any requests should be forwarded to the Compliance Officer. Our data 'Privacy Policy' is available on our website – www.symmetryfinancial.ie



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