

Terms of Business

Effective from 1st June 2023

Venture Wealth Ltd T/a Clan Wealth Management

Reg. Address: 51 Ashfort, Golf Links Road,
Castletroy, Limerick

Business Registration No: 727100

Director: Keith Matthews

Central Bank Registration no. is CB505630

Contact details:

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087-9918154

www.clanwealth.ie

These Terms of Business set out the general terms under which our firm will provide business services to you and the respective duties and responsibilities of both the firm and you in relation to such services. Please ensure that you read these terms thoroughly and if you have any queries, we will be happy to clarify them. If any material changes are made to these terms, we will notify you.

Regulation & Authorisation

Clan Wealth Management CB505630 is regulated by the Central Bank of Ireland authorised as an investment intermediary under Section 10 of the IIA, registered as an insurance intermediary under Regulation 10 of the IDR. Copies of our regulatory authorisations are available on request, or you can verify our regulatory status by checking the Central Bank financial service providers register at www.centralbank.ie.

Codes of Conduct

Clan Wealth Management is subject to the Consumer Protection Code, Minimum Competency Code and Fitness & Probity Standards which offer protection to consumers. These Codes can be found on the Central Bank's website www.centralbank.ie.

Our Services

We offer general (unregulated) financial planning advice to clients, covering all aspects of your current financial situation, and future goals and objectives. We also offer specific (regulated) savings and investment, pension, and life insurance advice and, where appropriate make product recommendations. A full list of insurers, product producers and lending agencies with which we deal is available on request.

Fair and Personal Analysis

Our advice is provided on a "fair analysis" basis, which means we recommend the best product for the consumer after researching a sufficiently large section of the market, not just the product providers we have agencies with.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to investment, pension, mortgages, and life insurance products. Prior to arranging a product for you, our written Statement of Suitability will advise you of the product's suitability, based on your financial information, your risk profile, and your needs and objectives, as set out by you in the Clan Wealth Management Client Questionnaire and in subsequent documented conversations. All advice given will be based on this information, our analysis of financial markets and products, and our understanding of current law and Revenue practice.

Life & Pensions/Deposits & Life Wrapped Investments

We provide life assurance and pensions on a fair and personal analysis basis i.e., providing services based on a sufficiently large number of contracts and product producers available in the market to enable us to make a recommendation, in accordance with professional criteria, regarding which contract would be adequate to meet your needs.

We will provide assistance for any queries you may have in relation to the policies or in the event of a claim during the life of the policy 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 (PHI) and serious illness policies.

Specifically on the subject of permanent health insurance policies we will explain to you; the meaning of disability as defined in the policy; the benefits available under the policy; the general exclusions that apply to the policy and 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.

Sustainable Investing

We will consider adverse impacts of investment decisions on sustainability factors in our investment and insurance-based Investment advice. We will gather your preferences of Sustainable Investing and build them into our Statement of Suitability for you. Ultimately, it is the Product Producers we have agencies with that build the Investment Products we advise on, and it will be their documentation we are relying on when advising you on Sustainable investments. All information re Sustainable Finance Disclosures will be adhered to by the Product Producers and their brochures and documents will outline their disclosures.

Statement of Charges

We are remunerated by commission and other payments from product producers or lenders on the completion of business. A summary of the details of all arrangements for any fee, commission other reward or remuneration paid or provided to us which have agreed with product providers is available in our office or on our website – www.clanwealth.ie

In certain circumstances, it will be necessary to charge a fee for services provided. We will notify you in writing in advance and agree the scale of fees to be charged if different from fees outlined above.

If we receive commission from a product provider, this may/will be offset against the fee which we will charge you. Where the commission is greater than the fee due, the commission may become the

amount payable to the firm unless an arrangement to the contrary is made.

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, may result in you having insufficient insurance cover and/or inappropriate investments.

Disclosure of Information

Any failure to disclose material information may invalidate your claim and render your policy void.

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.

Default on payments by clients

We will exercise our 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 or other products arranged for you. We would refer you to policy documents or product terms for details of such provisions.

Complaints

Whilst we are happy to receive verbal complaints, it would be preferable that any complaints are made in writing. We will acknowledge your complaint in writing within 5 business days and we will fully investigate it. We shall investigate the complaint as swiftly as possible, and the complainant will receive an update on the complaint at intervals of not greater than 20 business days starting from the date on which the complaint is made. On completion of our investigation, we will provide you with a written report of the outcome.

In the event that you are still dissatisfied with our handling of or response to your complaint, you are entitled to refer the matter to the Financial Services and Pensions Ombudsman (FSPO).

Data Protection

We are subject to the requirements of the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018. Clan Wealth Management is committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights as a client.

The data will be processed only in ways compatible with the purposes for which it was given and as outlined in our Data Privacy Notice; this will be given to all our clients at the time of data collection.

We will ensure that this Privacy Notice is easily accessible. Please refer to our website www.clanwealth.ie. If this medium is not suitable, we will ensure you can easily receive a hard copy. Please contact us at info@clanwealth.ie if you have any concerns about your personal data.

Investor Compensation Scheme

We are members of the Investor Compensation Scheme established under section 30 of the Investor Compensation Act 1998. The Act provides that compensation shall be paid to eligible investors (as defined in the Act) to the extent of 90% of an investor's net loss or €20,000, whichever is the lesser, and is recognised as being eligible for compensation. Further details are available on request.

Handling Client Money

We do not operate bank accounts or accept payments in cash for client monies due to product providers. All such cheques and drafts should be made payable directly to the relevant financial institution where they are being invested / paid as a premium. We will issue a receipt for each payment received. This is pursuant to Section 30 of the Investment Intermediaries Act, 1995.

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 to comply with the prevailing Criminal Justice (Money Laundering and Terrorist Financing) legislation.

Acceptance of these Terms

I/We have read, understood, and accept these Terms of Business and confirm my/our agreement to Clan Wealth Management acting as my/our Financial Planner and agree to pay in full any fees incurred on my/our behalf in respect of any agreed services.

I/We authorise you to hold my/our personal data on file, to contact me/us in writing, by telephone or by email in respect of financial matters, and to obtain or provide any relevant information in respect of my/our existing accounts, policies, pensions, or investments directly from or to the appropriate data processors, product, or investment providers.

I/We understand that the quality of the advice given will depend on the accuracy of any information provided by me/us.

Signed: _____

Name: _____

Date: _____

Signed: _____

Name: _____

Date: _____