

Terms of Business

Cadence Capital Advisors Limited ("Cadence") is regulated by the Central Bank of Ireland as an investment intermediary authorised under the Investment Intermediaries Act, 1995 and as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations 2018. Copies of our regulatory authorisations are available on request. The Central Bank of Ireland holds registers of regulated firms. You may contact the Central Bank of Ireland by email at retailintermediaries@centralbank.ie or alternatively visit their website at www.centralbank.ie to verify our credentials.

These Terms of Business ("Terms") outline the basis on which we provide regulated financial services to our clients. Please ensure that you read this document. These Terms apply to all business transactions undertaken for you or services provided to you and will remain in force until further notice. Should we make any material changes to our Terms, we will advise you in advance of providing any further services to you.

Contact Details

Our registered office is at 9 Fitzwilliam Square East, Dublin 2, D02FX96. Our company registered number is 644517 and our Central Bank registration number is C191261.

Statutory Codes

Cadence is subject to the Central Bank of Ireland's Consumer Protection Code, Minimum Competency Code and Fitness and Probity Standards. These Codes offer protection to consumers and can be found on the Central Bank website at www.centralbank.ie.

Services

Cadence is authorised by the Central Bank of Ireland to provide investment advice and to receive and transmit orders in the following investment instruments:

- Personal Retirement Savings Accounts (PRSAs)
- Shares and Bonds
- Collective Investment Schemes

We hold appointments with a number of product producers, including insurance companies and investment firms. A full list of these product producers is available on request.

We provide investment advice based on an analysis of the investment instruments and insurance products available to our clients via the producers we have appointments with,

details of which are available on request. Our appointments enable us to recommend a wide range of investments including, *inter alia*, listed shares, investment trusts, Exchange Traded Funds (ETFs) and investment funds.

We are also authorised to recommend and arrange transactions on behalf of clients in relation to life assurance products and we hold appointments with a number of insurance companies whose products we recommend.

Account Opening requirements and Anti-Money Laundering

In order to comply with legal and regulatory requirements we are obliged to request information from you to verify your identity as well as your source of funds and to keep a record of this information. Before opening an account for you, we will request such information and documentation where we deem it necessary to meet our obligations.

Should you not provide satisfactory evidence of your identity within a reasonable time, we may not be in a position to open an account for you. We may request updated identity and verification documents from time to time.

Fact find, Statement of Suitability and Ongoing Advice

All clients are required to complete Cadence's account opening Application Form. This document contains key information on your contact details, financial information, investment objectives and risk appetite and investment time horizon. We will also obtain further information in that regard through meeting with you.

It is important that the information you provide is complete and accurate as it will form the basis for future investment recommendations, and we accept no liability for any omissions or oversights on your part. You are also requested to notify us of any material changes to your personal circumstances as these may impact on the investment advice we provide to you.

Prior to providing any investment advice or recommendation, we will issue a Statement of Suitability to you demonstrating why we believe such investment advice or recommendation is appropriate to your needs. This statement sets out our understanding of your needs, objectives and circumstances and the reasons why we are recommending certain investments, including the costs of our recommendations.

We review our recommendations on a regular basis and in the event that we recommend any changes to your portfolio we will provide an updated Statement of Suitability on each such occasion.

Sustainability Factors and Suitability Preferences

We are required to gather information about your preferences around sustainability as these relate to your approach to investing and investments. Your sustainability preferences will be captured as part of the initial fact finding exercise.

When providing advice, the firm does not currently consider the adverse impacts of investment decisions on sustainability and is not in a position to incorporate your sustainability preferences. This is because the information available to us in product producers' literature to compare financial products and to make informed investment decisions about ESG products is not sufficient at present to allow us to make a reliable comparison. We expect that this position will change, and we will revisit our decision within six months. When we are satisfied that we are in a position to do so, your sustainability preferences will form part of the assessment of investments that are suitable for you.

Fees and Charges

Although we are primarily a fee only advisor whereby, we will charge you a fee for the investment advice we provide and will not charge a commission on transactions, we will disclose the specific fees and/or commissions that are payable by you in advance of providing a service to you. These vary and are subject to change.

Investor Compensation Scheme

The Investor Compensation Act, 1998 provides for the establishment of a compensation scheme operated by the Investor Compensation Company Limited (ICCL) and for the payment of compensation to clients that are deemed to be 'eligible investors'. Cadence is a member of this compensation scheme. The amount of compensation that you may receive under the compensation scheme is 90% of the net amount you have lost or €20,000; whichever is less. Full details of the Investor Compensation Scheme are available on www.investorcompensation.ie.

Conflicts of Interest

It is the policy of Cadence to act in the best interests of our clients and to avoid a conflict of interest when providing services. However, where an unavoidable conflict arises, we will advise you of this in writing before providing any business service and request your

written acknowledgment that you are aware of the conflict of interest and still want to proceed.

We have a written policy which sets out the steps that we take to ensure that we avoid or, where this is not possible, mitigate conflicts of interest that may arise in providing services to you. These steps include administrative and organisational arrangements appropriate to the size, nature and complexity of the business to ensure that staff always act in the best interests of clients. A copy of the policy is available on request, its main provisions are summarised in this Terms of Business.

It is our policy that none of our employees offer, give, solicit or accept gifts or rewards (monetary or otherwise). Employees of Cadence are remunerated substantially by salary rather than by variable remuneration based on commission or sales targets.

Some instances where conflicts may arise and the steps we take to mitigate them are as follows:

- In the normal course of business, Cadence may receive commission/intermediary remuneration from insurance companies' that business is placed with. All product recommendations we make are supported by a detailed Statement of Suitability which explains the basis for the recommendation. We never make recommendations based on the remuneration we receive from product producers.
- Cadence may receive minor non-monetary benefits from product producers we direct business to. In all cases these are designed to enhance the service we provide and will not conflict with the best interests of our clients.

Data Protection

Cadence is a Data Controller as defined in the Data Protection Acts 1988 to 2018 ("Acts"). We collect personal data about you in order to provide the highest standard of service to you and in order to comply with our legal and regulatory obligations. This includes account opening information and any other personal data you provide to us or that we collect or process in the normal course of providing the services set out in these Terms.

We take great care with personal data that is provided to us, taking steps to keep it safe, secure and private and to ensure it is used only for legitimate purposes and in accordance with data protection legislation including the Acts and the General Data Protection Regulation 2018.

The data which you provide to us will be held in electronic format on a computer database and/or on paper files. Your data will be processed only in ways compatible with the purposes for which it was given. We may use your personal data for the purposes of:

- Providing the services we have been contracted to provide to you including investment advice and receipt and transmission of orders.
- Reporting and management information, including quality assurance.
- Prevention of money laundering, financing of terrorism and fraud and otherwise complying with legal and regulatory obligations.
- Providing you with information about our services and products that may be of interest and relevance to you. You have the right to ask us not to send you marketing material and, at any time, you can 'opt out' of receiving marketing material.

We may share your personal data with:

- Product producers we transmit orders to for execution.
- Regulators, law enforcement agencies and any other public bodies we are legally obliged to disclose such information to.
- Service providers of Cadence who have undertaken to keep such information confidential.

In order to comply with regulatory obligations, we are obliged to retain personal data for a minimum period of 6 years or such longer period as we are directed to by law. You have the right at any time to request a copy of any 'personal data' that we hold about you in whatever format. You may have other rights in relation to your personal data which apply in certain circumstances and which are described in more detail in our privacy statement on the Cadence website. You may request a copy of your personal data by writing to Sandra Robertson, Cadence Capital Advisors Limited, 9 Fitzwilliam Square East, Dublin 2.

By agreeing to these Terms of Business you acknowledge the processing of your personal data as set out herein.

Complaints

Cadence has a written procedure in place for the handling of any complaints that are made against our firm for services provided by us. This procedure ensures that all complaints are recorded and acknowledged in writing within 5 business days and are fully investigated. Any complaints should be addressed to Sandra Robertson, Cadence Capital

Advisors Limited, 9 Fitzwilliam Square East, Dublin 2. If you are dissatisfied with our handling of, or response to your complaint, you can refer the matter to The Financial Services and Pensions Ombudsman. The Financial Services and Pensions Ombudsman is a statutory officer who deals independently with unresolved complaints from consumers about their individual dealings with financial services providers. It is a free service to the complainant.

Further details relating to the Financial Services and Pensions Ombudsman, including how to make a complaint, are available at www.financialombudsman.ie, by telephone on Lo-Call Number: 1890 88 20 90, or by writing to the Financial Services and Pensions Ombudsman, 3rd Floor, Lincoln House, Lincoln Place, Dublin 2.

Governing Law

These Terms of Business shall be governed by the laws of the Republic of Ireland. These Terms of Business are effective from September 2019 and apply until further notice.

Cadence Capital Advisors Limited is regulated by the Central Bank of Ireland.

Last Updated: 17 January 2023