



# Compliance with CP116

We, Moneybox Financial Ltd trading as Moneycube, act as intermediary (broker) between you, the consumer, and the product provider with whom we place your business.

Our Remuneration: statement in compliance with provision 4.58A of the Central Bank of Ireland's September 2019 Addendum to the Consumer Protection Code

**Last update: 25 January 2024**

## **The background**

Pursuant to provision 4.58A of the Central Bank of Ireland's September 2019 Addendum to the Consumer Protection Code, all intermediaries must make available in their public offices, or on their website if they have one, a summary of the details of all arrangements for any fee, commission, other reward or remuneration provided to the intermediary which it has agreed with its product producers.

## **What is Remuneration?**

Remuneration is the payment earned by the intermediary for work undertaken on behalf of both the provider and the consumer. The amount of remuneration is generally directly related to the value of the investments made.

## **What is Commission?**

Commission is payment that may be earned by an intermediary for work undertaken for both provider and consumer.

Moneycube receives two types of commission in connection with its investment and pension services:

**Single commission model:** where payment is made to the intermediary shortly after the sale is completed and is based on a percentage of the amount invested.

**Trail/Renewal commission model:** Further payments at intervals are paid throughout the life span of the product.

## **Life Assurance/Investments/Pension Products**

For Life Assurance products commission is divided into initial commission and renewal commission (related to premium), fund based or trail (relating to accumulated fund).



Trail commission, bullet commission, fund based, flat commission or renewal commission are all terms used for ongoing payments. Where an investment fund is being built up through an insurance-based investment product or a pension product, the increments may be based on a percentage of the value of the fund or the annual premium. For a single premium/lump sum product, the increment is generally based on the value of the fund.

Life Assurance products fall into either individual or group protection policies and Investment/Pension products would be either single or regular contribution policies. Examples of products include Life Protection, Regular Premium Life Assurance Investments, Single Premium (lump sum) Insurance-based Investments, and Single Premium Pensions.

### **Investments**

Investment firms, which fall within the scope of the European Communities (Markets in Financial Instruments) Regulations 2007 (the MiFID Regulations), offer both standard commission and commission models involving initial and trail commission. Increments may be based on a percentage of the investment management fees, or on the value of the fund.

### **Clawback**

Clawback is an obligation on the intermediary to repay unearned commission. Commission can be paid directly after a contract is concluded but is not deemed to be 'earned' until after a specified period of time. If the consumer cancels or withdraws from the financial product within the specified time, the intermediary must return commission to the product producer.

### **Fees**

The firm may also be remunerated by fee by the product producer such as policy fee, admin fee, or in the case of investment firms, advisory fees. *Include arrangements etc*

### **Other Fees, Administrative Costs/ Non-Monetary Benefits**

The firm may also be in receipt of other fees, administrative costs, or non-monetary benefits such as:

- Attendance at product provider seminars
- Assistance with Advertising/Branding

### **Sustainability factors**

When assessing products, we will consider the different approach taken by product providers in terms of them integrating sustainability risks into their product offering. This will form part of our analysis for choosing a product provider.

### **Detailed listing**

Below is a list of the providers that Moneycube deals with, which for ease of reference is in alphabetical order.



## Aviva

### Flexible Protection, Mortgage Protection Plan, Personal and Executive Pension Term Assurance

Rate	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7+
Range	22%- 150%	3%- 22%	3%- 22%	3%- 22%	3%- 22%	3%- 22%	3%- 22%

The clawback period is up to 2 years

### Personal & Executive Income Protection & WageProtector

Rate	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7+
Range	30%- 200%	15%- 30%	15%- 30%	15%- 30%	3%- 30%	3%- 30%	3%- 30%

The clawback period is up to 4 years

### Single Contribution Pension

Initial 2.5%

Trail 0.5%

### Regular Contribution Pension

Initial 15%

Trail 0.5%

### Investment bonds

Initial 1%

Trail 0.5%

### Investment regular savings

Initial 15%

The clawback period is up to 4 years on Regular Premium Products, Early Encashment Charges of up to 5% on Single Premium Products.



## Conexim

Personal, Joint, Corporate, and Trust investments, Pension and ARFs

Initial charge	0.5% - 1%
Ongoing charge	0.5%



## Davy

Personal, Joint, Corporate, and Trust investments, Pension and ARFs

Initial commission	0.5% - 1%
Ongoing fees	0.5%



## Irish Life Assurance

### Single Premium Pre-Retirement

	Initial commission	Trail Commission (p.a.)	Renewal Commission (p.a.)	Other commission
Private Pension, PRSA, CP & PRB - Annual premium				
Max	17.5%	0.5%	17.5%	n/a
Private Pension, PRSA, CP & PRB - Single premium				
Max	5%	0.75%	n/a	n/a
AMF/ AMRF - Single premium				
Max	5%	0.75%	n/a	n/a
Annuity - Single premium				
Max	3%			n/a
Investment bonds - Single premium				
Max	3%	0.5%	n/a	n/a
Investment only - Single premium				
Max	5%	0.5%	n/a	n/a
Savings products - Annual premium				
Max	5.5%	0.25% to yr 8 0.5% from yr 9	5.5%	n/a

### Protection

	Year 1	Additional Commission (p.a.)	Renewal Commission (p.a.)
Option 1	100%	From year 2-5: 20%	From year 6: 3% level From year 6: 6% indexed
Option 2	25%	From year 2-10: 25%	From year 11: 10% level
	28% indexed	From year 2-10: 28%	From year 11: 13% indexed
Option 3	20% level		From year 2: 20% level
	23% indexed		From year 2: 23% indexed
Option 4	80% level	5 years	From year 2: 12% level
	80% indexed	5 years	From year 2: 15% indexed

### Income Protection

	Year 1	Year 3 & Year 6	Years 7+	Years 7+
Max	120%	30%	3% level	6% indexed

### Group Protection

	Life	Income protection	Serious illness cover
Renewal commission	6%	12.5%	12.5%



## New Ireland Assurance Company plc

### Single contribution products

	Initial commission	Clawback period	Trail commission
Single Contribution Pension			
Max	5%	5 years	1%
Single Contribution PRSA			
Max	7%	5 years	0.5%
Approved (minimum) retirement funds			
Max	5%	n/a	1%
Annuities			
Max	3%	n/a	n/a
Single Premium investment policies			
Max	4%	3 years	1%

### Regular contribution products

	Initial commission	Clawback period	Renewal Commission (p.a.)	Trail Commission (p.a.)
Regular Contribution Pension				
Max	25%	5 years	8%	1%
Regular Contribution PRSA				
Max	25%	5 years	6%	0.5%
Single Premium investment policies				
Max	10%	5 years	2.5%	1%

### Individual Protection

	Year 1	Year 2	Years 3-5	Years 6+
Max	225%	50%	20%	12.5%
Clawback period	5 years			

### Group Protection

	Death in Service	Permanent Health insurance
	Year 1+	Year 1+
Max	15%	20%
Clawback period	1 year	1 year



## Standard Life

### Single contribution products

	Initial commission	Clawback period	Trail commission
Single Contribution Pension			
Max	5%	N/A	1%
Single Contribution PRSA			
Max	5%	N/A	0.5%
Approved (Minimum) Retirement Funds			
Max	4%	N/A	1%
Annuities			
Max	2%	N/A	N/A
Single Premium investment policies			
Max	4%	N/A	1%

Clawback period is the timeframe where Standard Life can take a proportion of the commission paid back from an advisor if the premium/ contribution ceases, reduces, or the product is closed.

### Regular contribution products

	Initial commission	Clawback period	Renewal Commission (p.a.)	Trail Commission (p.a.)
Regular Contribution Pension				
Max (front loaded)	1.25% X term (max 25%)	5 years*	2%	1%
Regular Contribution Pension				
Max (level)	5%	n/a	5%	1%
Regular Contribution PRSA				
Max	5%	n/a	5%	0.5%
Savings Plan (funded initial commission)				
Max	0-15%**	5 years*	n/a	1%
Savings Plan (premium based)				
Max	0-15%	n/a	n/a	1%

\*if the initial contributions are not maintained for 5 years, a proportion of the initial commission paid will be clawed back from Moneycube.

\*\*Percentage payable as a lump sum after the first premium is paid.

\*\*\*For every 1% taken there is a corresponding plan charge of 0.04% per annum. Commission is paid after the first premium is paid. FIC is subject to commission clawback.



## Royal London

Individual protection

Year	Maximum Commission Rate
1	225%
2	0%
3	0%
4	0%
5	0%
6	3%
7	3%
8	3%
9+	3%

The clawback period is up to 4 years.



## Zurich Life

Single contribution products (Pensions, Investments)

	Initial commission	Trail commission
Single Contribution Pension		
Max	5.5%	0.50%
Single Contribution PRSA (Standard)		
Max	5.50%	0.00%
Single Contribution PRSA (Non-Standard)		
Max	5.0%	0.50%
Approved (Minimum) Retirement Funds		
Max	5.0%	0.50%
Annuities		
Max	3.0%	N/A
Investment Bonds		
Max	5.0%	0.50%
Trustee Investment Plans		
Max	5.0%	0.50%

Commission clawback typically does not apply on single contribution products

Regular contribution products (Pensions, Savings)

	Initial commission	Renewal / Bullet Commission	Trail commission
Regular Contribution Pension			
Max	20.0%	3.0% renewal	0.50%
Regular Contribution PRSA (Standard)			
Max	5.0%	5.0% renewal	0.0%
Regular Contribution PRSA (Non-Standard)			
Max	5.0%	5.0% renewal	0.50%
Savings Plan			
Max	10.0%%	1.0% renewal	0.50%

Commission clawback applies over a 4 year period for all initial commission.

Commission clawback also applies over a 4 year period for any bullet commission noted.



### Individual Protection

#### Guaranteed Term Protection & Guaranteed Mortgage Protection

	Year 1	Years 2-10	Years 11+
Max	100%	12%	3%

Commission paid in year 1 is earned over a 12 month period.

#### Guaranteed Whole of Life

	Year 1	Years 2-5	Years 6+
Max	90%	18%	3%

Commission paid in year 1 is earned over a 12 month period.

#### Group Protection, Group Life Cover

	Year 1	Year 2	Year 3
Max	6.0%	6.0%	6.0%

Commission clawback does not apply. Commission is paid as premiums are received.

#### Group Permanent Health Insurance & Group Serious Illness Cover

	Year 1	Year 2	Year 3
Default			
Max	12.5%	12.5%	12.5%

Commission clawback does not apply. Commission is paid as premiums are received.