Newcourt PRSA Preliminary Disclosure Certificate

This Preliminary Disclosure Certificate **("PDC")** contains some important information about your Newcourt PRSA. This is a non-standard PRSA.

This PDC has been prepared based on a typical contributor. The contributions and charges projected in this document arefor illustrative purposes only. Once your contract is issued, you will receive a Statement of Reasonable Projection **("SORP")** which will contain a projected table of benefits specific to your Newcourt PRSA.

1. Important Information

(a) Benefits

This section outlines the benefits available to you under the Newcourt PRSA.

Benefits payable on Retirement

The purpose of the Newcourt PRSA is to provide a tax efficient means of saving for retirement with a wide range of investment options.

You can begin to receive retirement benefits on or after your 60th birthday or before your 75th birthday. You may be able to receive your retirement benefits before your 60th birthday if you provide appropriate supporting evidence that you qualify for ill health early retirement.

In the case of an individual being an employee you can retire at age 50 years or over and receive your retirement benefits subject to certain Revenue requirements being met. Your PRSA can accept contributions after your retirement age, provided you are still under 75 years of age.

You must take your retirement benefits from the PRSA before your 75th birthday otherwise the benefits can only be accessed in the event of your death.

You can use the value of your PRSA at retirement to avail of any options provided for by legislation including:

1. A tax-free lump sum subject to maximum legislative limits.
2. An annuity on your life or on a joint life basis with your spouse. Please note that the Default Investment Strategy may not be suitable for PRSA contributors who want to generate an income for retirement through purchasing an annuity.
3. Once you commence taking benefits, you may opt to retain the funds in the PRSA and withdraw funds from the PRSA as you wish. This is then deemed a **"Vested PRSA".** Tax will be deducted from withdrawals under the PAYE system.
4. Alternatively, the value of the assets in your PRSA may be transferred to an Approved Retirement Fund **("ARF").**
5. There may be other options provided by legislation.

If you choose the "Vested PRSA" option, a minimum of €63,500* must be used to purchase an annuity payable immediately or be kept in the PRSA until you reach 75 years of age, unless you have a pension or annuity payable for life in excess of €12,700* per annum (including any Social Welfare Pension to which you may be entitled).

If you choose to invest in an ARF, a minimum of €63,500* must be used to purchase an annuity payable immediately or be kept in an Approved Minimum Retirement Fund **("AMRF")** until you reach 75 years of age, unless you have a pension or annuity guaranteed for life in excess of €12,700* per annum (including any Social Welfare Pension to which you may be entitled). The funds in an ARF may be withdrawn at any time or invested in an Annuity. Tax will be deducted from withdrawals under the PAYE system. The **Finance Act 2014** introduced a change to the imputed distribution requirement on Approved Retirement Funds (ARFs) of 4% where an individual is aged 60 or over for the full tax year and 5% if aged 70 or over for the full tax year, where the value of the individual's combined ARF(s) and/or Vested PRSA(s) are under €2,000,000. Where an individual has an ARF(s) and/or Vested PRSA(s), with a combined total value in excess of €2,000,000 the imputed distribution requirement increases to 6%, if aged 60 or over for the full tax year. The imputed distribution is calculated on the value of the fund(s) as at 30th November each year.

For an AVC PRSA the tax-free lump sum is determined in accordance with the rules of the scheme of which you are a member. In addition to this, any tax-free lump sum payments will be restricted in accordance with current tax legislation. We shall also liaise with the Trustees of your approved or statutory pension scheme prior to making available to or paying to any other person (i.e. surviving spouse or legal personal representative) the amount or value of any AVC PRSA assets.

* These thresholds may change in the future

Benefits payable on Death

In the event of your death prior to drawing benefits from your PRSA we will transfer the value of your funds to your surviving spouse or to your estate. The benefits may be subject to inheritance tax.

In the event of your death after you have drawn down your benefits from the PRSA and you have funds invested in a "Vested PRSA" the assets in the PRSA at the time of death will be transferred to your estate. The benefits may be subject to inheritance tax and income tax under the PAYE system.

Benefits payable on Transfer

Where you have elected to transfer some or all of the proceeds of your PRSA to another PRSA contract you have entered into or to a Revenue approved retirement benefits scheme of which you are a member, we will calculate your transfer value on processing your request. No transfer charge will apply.

(b) Investment Strategy

The Newcourt Self Directed PRSA allows you to invest your retirement savings as follows:

1. Direct share dealing facilities through a nominee stock broking account
2. Direct property and syndicated investments
3. Bank deposit and current accounts
4. Structured products – tracker bond

5. Institutional funds including many leading external investment managers
6. A variety of collective investment schemes including unit trust arrangements

It should be noted that the value of your PRSA can move up and down in line with the value of the underlying investments held in your contract. Newcourt at all times reserves the right to refuse a PRSA contributor to invest in a specific asset. No specific reason must be given or is required for such refusals.

Default Investment Strategy

The Default Investment Strategy ("DIS") is the New Ireland Assurance PRIME 3 Fund. It aims to fulfil the reasonable expectations of a typical contributor who is expected to remain invested in their PRSA on retirement or invest it in an equity based Approved Retirement Fund ("ARF"). It has been assumed that the "typical investor" is willing to accept a low to medium degree of risk if using this DIS.

The DIS may not be suitable for contributors who want to generate an income in retirement through purchasing an annuity. If you invest in the DIS you will be exposed to investment risks.

In the event you do not choose specific investments (including cash) the contributions to your Newcourt PRSA will be automatically invested in the Default Investment Strategy. The PRIME 3 Fund with New Ireland Assurance has been nominated as the DIS for the following reasons:

- The objective of the fund is to generate returns reflective of the risk profile of the fund by investing in a range of passive funds
- It adopts a multi-asset approach – offering access to the return potential that can come from exposure to equities, bonds and a range of alternative assets
- Passive investment approach – it invests in a range of funds which adopt a passive investment strategy. This is one that tracks market weighted indices or portfolios rather than relying on a fund manager to make investment decisions
- It provides a Risk Conscious Solution **- a**n adjustment process is in place to reduce risk during times of high market volatility. Through a dynamic risk adjustment mechanism, exposure to equities is reduced in order to deliver a smoother, more stable investment journey

The PRIME 3 Fund has exposure to 6 asset classes – Developed World Equities (risk adjusted), Euro Government Bonds, Diversified Alternatives, Cash, Euro Corporate Bonds and Property.

To achieve its risk goals, PRIME 3 can vary its exposure to developed world equities. If market volatility is high, indicating short and sharp movements and an increased risk of investors losing money, exposure to these equities is reduced. If market volatility is low, indicating the market is steady, exposure to equities is increased.

Further information about the New Ireland Assurance PRIME 3 Fund is available on request.

The DIS aims to fulfil the reasonable expectations of a typical contributor. The asset mix of the DIS does not vary with term as the typical contributor is expected to remain invested in their PRSA on retirement or invest it in an equity based Approved Retirement Fund (ARF).

It is not intended that the DIS is free of risk and benefits are dependent on investment returns and general economic and market conditions.

(c) Tax

The following information is intended to give an illustration of the current taxation requirements of your PRSA. It is based on Newcourt Retirement Fund Managers' understanding of current tax legislation and Revenue guidelines. This information does not aim to be a definitive interpretation of the current tax regime. Please consult your tax advisor in relation to the taxation of your PRSA.

Tax Relief on Contributions

Income tax relief on personal and employer (if any) contributions is currently limited to a maximum net relevant earnings (NRE)* limit and a percentage of net relevant earnings which varies based on your age in the year in question:

Age attained in tax year	% NRE
Under 30	15% of NRE
30 – 39	20% of NRE
40 – 49	25% of NRE
50 – 54	30% of NRE
55 – 59	35% of NRE
60 and over	40% of NRE

* Maximum Net Relevant Earnings on which relief is allowed is €115,000.

Note that income tax relief does not apply to transfer values paid into your PRSA.

Taxation of Investment growth

Your Newcourt PRSA is exempt from the following tax:

1. DIRT
2. Irish Dividend Withholding Tax
3. Exit tax, in respect of investment in Irish unit linked and collective investment funds
4. Irish Capital Gains Tax
5. Irish Income Tax

Note that if you invest in certain assets in other jurisdictions within your Newcourt PRSA, investment growth may be subject to local taxes which may not be recoverable.

Taxation of Benefits

On retirement you can choose to take a tax-free lump sum of up to 25% of your accumulated fund subject to certain restrictions. The maximum tax-free lump sum that you can take is €200,000. The next €300,000 will be taxed on a one off basis at the standard rate of income tax and anything in excess of this will be taxed at the marginal rate of income tax and will also be subject to PRSI (up to age 66) and the Universal Social Charge. Any retirement lump sums taken on or after 7th December 2005 will count towards these limits.

There is a limit on the maximum fund that can be built up on retirement. This is currently €2,000,000. This figure includes all of your pension funds, including the capital value of any retirement benefits drawn down since 7th December 2005. Where the relevant limit is exceeded, the excess in your pension funds at retirement will be liable to a once off Income Tax charge.

In certain circumstances you may have a Personal Fund Threshold, which will allow you a fund in excess of €2,000,000 however any lump sum that can be drawn down tax-free is still restricted to €200,000 with the next €300,000 taxed on a one off basis at the standard rate of income tax. Amounts in excess can be drawn but will be taxed under the PAYE system as set out above.

If you transfer your retirement fund to an Approved Retirement Fund (ARF) or purchase an annuity, income tax under the PAYE system, PRSI and USC may apply to the benefits paid under these contracts.

If you are paying AVCs into your PRSA then the amount you can take as a tax-free lump sum will depend on the rules of your main pension scheme and limits set by the Revenue Commissioners.

In the event of your death prior to drawing benefits from your PRSA we will transfer the value of your funds to your surviving spouse or to your estate. The benefits may be subject to inheritance tax. In the event of your death after you have drawn down the benefits from the PRSA and you have funds invested in a “Vested PRSA” the assets in the PRSA at the time of death will be transferred to your estate. The benefits may be subject to inheritance tax and income tax under the PAYE system.

(d) Risk Factors

Investment risk

The benefits from your PRSA are not guaranteed. The value of the underlying PRSA investments may fall as well as rise. The value of your PRSA at retirement will depend on the contributions made and the investment return achieved on these contributions. The investment return is not guaranteed and with certain investments you may lose your capital investment. It is worth noting that short-term investment returns can be quite volatile particularly in equity and property based funds. You will be exposed to currency risk if you invest in assets which are denominated in currencies other than euro. Newcourt does not accept liability for the performance of the underlying assets of your PRSA.

It is important to note that the Default Investment Strategy may not be suitable for contributors who want to generate an income for retirement through purchasing an annuity. If you invest in the DIS you will be exposed to investment risks.

Newcourt PRSA Preliminary Disclosure Certificate

Accessing your PRSA funds and Early Retirement

Under normal circumstances your PRSA funds cannot be accessed before you reach age 60. You may be allowed to access your PRSA funds before age 60 in certain circumstances, for example, if you either retire from an employment or retire as a result of ill health.

The benefits outlined in your Statement of Reasonable Projection have been set out assuming that you retire at a certain retirement date. If you retire earlier than expected, your fund value and benefits may be lower than if you retired at the original expected retirement date. If this is the case then the benefits may also have to be provided for a longer period of retirement than expected.

Contributions

As mentioned above the value of your PRSA at retirement will depend on the level of contributions made during the lifetime of your PRSA. The more you contribute, the larger your expected fund at retirement. If you fail to make sufficient contributions or if you stop paying regular contributions, your fund at retirement may be lower than expected and may not be sufficient to support you in your retirement.

Delay periods

In certain circumstances there may be a delay in switching funds or transferring out of your PRSA. These delays may occur where the assets are illiquid (e.g. property investments) and "in specie" transfers are not possible because of the nature of the receiving pension arrangement.

2. The Projected Level of Benefits

The benefits that will emerge from your PRSA will depend, in particular, on the level of your contributions, how long you pay those contributions and the investment return achieved. The table below illustrates the projected benefits that might be obtained from this PRSA contract.

The illustrations have been prepared based on the following personal details:

- Age at Entry: 40
- Normal Retirement Age: 60
- Single Contribution: €200,000
- Investment Term: 20 years

Note that in projecting the table of benefits below, it has been assumed that the contributor mainly invests in property with a small cash holding. The investment return and charges used in this projection reflect this asset mix. It has also been assumed that the contributor does not invest in the Default Investment Strategy. The charges assumed in this projection are as follows:

- Annual Management Charge: 1.00%
- Underlying Fund Charge: 0.50%

In particular, the charges used in this illustration may not reflect the specific charges that will be deducted from your PRSA. These charges will depend on fund value and asset mix. Please see Section 4 – Information on Charges for more details on this.

The information below contains details of the retirement income that could be purchased with the value of your PRSA assets on retirement. This retirement income has been calculated based on an annuity that is assumed to be paid monthly in advance for life, with guaranteed payments for 5 years. The annuity is payable on your life only and is assumed to increase by 1% per annum during your lifetime. This annuity rate is not guaranteed. It is based on long term rates. If you choose to purchase an annuity at retirement, the rate you receive will depend on annuity rates at that time which could be higher or lower than this rate.

The Default Investment Strategy may not be suitable for a contributor who wishes to purchase an annuity on retirement. Please see Section 1(b) - Investment Strategy for more details.

We do not have sufficient information to produce a Certificate that reflects your specific circumstances. Consequently, the level of contributions, projected benefits and intermediary remuneration shown here may be misleading. If you accept the terms of this contract, we will subsequently send you a Statement of Reasonable Projection that will reflect your specific circumstances. You will then have 30 days in which to cancel the contract if you wish.

TABLE OF BENEFITS

	€	€	€	€
Year	Total amount of contributions paid into the PRSA contract to date	Projected investment growth to date	Projected PRSA contract value if no account is taken of applicable charges to date	Projected PRSA contract value if account is taken of applicable charges to date
1	200,000	8,100	208,100	204,996
2	200,000	16,565	216,565	210,153
3	200,000	25,410	225,410	215,474
4	200,000	34,653	234,653	220,965
5	200,000	44,313	244,313	226,630
10	200,000	99,534	299,534	257,744
15	200,000	168,351	368,351	294,019
19	200,000	235,415	435,415	327,276
Year 20 (Maturity)	200,000	254,109	454,109	336,236

IMPORTANT

THE PROJECTIONS SHOWN ABOVE MAKE NO ALLOWANCE FOR THE EFFECT OF INFLATION WHICH WILL REDUCE THE VALUE OF THE PROJECTED BENEFITS. THE PROJECTED MATURITY VALUE OF €336,236 SHOWN IN THE TABLE IS WORTH €249,645 IN TERMS OF CURRENT PRICES. THIS MATURITY VALUE COULD PURCHASE A RETIREMENT

Newcourt PRSA Preliminary Disclosure Certificate

INCOME[1] FOR THE REST OF YOUR LIFE STARTING FROM THAT DATE OF €585 PER MONTH IN TERMS OF CURRENT PRICES.

THESE ILLUSTRATIONS ASSUME AN INVESTMENT RETURN BEFORE RETIREMENT OF 4.20% PER ANNUM AND INFLATION OF 1.50% PER ANNUM. THESE RATES ARE FOR ILLUSTRATION PURPOSES ONLY AND ARE NOT GUARANTEED.

ACTUAL INVESTMENT GROWTH WILL DEPEND ON THE PERFORMANCE OF THE UNDERLYING INVESTMENTS AND MAY BE MORE OR LESS THAN ILLUSTRATED.

THE ANNUITY RATE USED IS A LONG TERM AVERAGE AND IS NOT GUARANTEED. THE ACTUAL ANNUITY RATE AVAILABLE AT RETIREMENT MAY DIFFER FROM THE ANNUITY RATE USED IN THE ILLUSTRATION. DIFFERENT ANNUITY OPTIONS CAN BE CHOSEN AT RETIREMENT.

WARNINGS
It is important to make adequate provision for retirement. At the date of this Certificate the State (Contributory) Pension payable under the Social Welfare (Consolidation) Act 2005 to a single person who is qualified to receive the maximum rate amounts to €253.30 per week and equates to 32% of the latest yearly figure for gross average earnings as published by the Central Statistics Office for all industrialworkers in all industries.

The value of your assets, and accordingly, the level of your benefits will depend on the value of the underlying investments of the PRSA and the income which they earn. These values are not guaranteed, and may fall from time to time, as well as rise.

This PRSA is intended to provide benefits over the duration of your life from retirement and it should be viewed as a long term investment.

It is recommended that you seek professional financial advice about the nature of this PRSA before signing the PRSA contract.

This illustration assumes an investment term of 20 years and a single contribution of €200,000 to your PRSA.

[1] Please note that the DIS may not be suitable for contributors who want to generate an income in retirement through purchasing an annuity. If you invest in the DIS you will be exposed to investment risks.

3. Intermediary Remuneration

ILLUSTRATIVE TABLE OF INTERMEDIARY REMUNERATION AND SALES REMUNERATION

Year	Contributions payable in that year	Projected total intermediary and sales remuneration payable in that year
	€	€
1	200,000	506
2	0	518
3	0	531
4	0	545
5	0	559
10	0	635
15	0	725
19	0	806
Year 20 (Maturity)	0	829

This remuneration is paid for by us from the charges we make on your contract.

4. Information on Charges

This section sets out all charges applicable to your Newcourt PRSA including how they are applied and when they are applied.

The Newcourt PRSA does not attract a contribution or entry/exit charge under any circumstances. An annual contract charge is applied to your PRSA called the **Annual Management Charge ("AMC").** The AMC depends on the level of funds in your PRSA on particular valuation dates as outlined below.

Where contributions are transferred in from another PRSA, an occupational pension arrangement, a retirement annuity contract, or from pension arrangements outside the State, no contribution charges are applied.

In the illustration above we have assumed that the PRSA assets are invested in a mixture of property and cash. We have not assumed that the assets are invested in the Default Investment Strategy. The charges assumed in this projection are as follows:

- Annual Management Charge: 1.00%
- Underlying Fund Charge: 0.50%

The charges under the Newcourt PRSA are competitive and transparent, as set out below:

Fund Size	**Annual Management Charge (inclusive of VAT)**
Less than €25,000	2.5%
Between €25,000 & €99,999	1.5%
Between €100,000 and €499,999	1.0%
Between €500,000 and €1,999,999	0.5%
Between €2,000,000 and €4,999,999	0.4%
€5,000,000 and over	0.25%

Newcourt PRSA Preliminary Disclosure Certificate

The Annual Management Charge **("AMC")** will be calculated by applying one of the above percentages to the entire fund value and is inclusive of VAT. The percentage to apply will be the percentage in the above table that corresponds to the size of your fund at the charging date.

Initially there will be two charge dates each year, which will fall on the 31st March and 30th September. The charge will be calculated on a daily basis from the date of commencement of the PRSA to the next assigned billing date. It will be calculated by multiplying the annual management charge by the fund value at the charge date and proportionately charging for the number of chargeable days. Thereafter the billing will be every six months (in arrears) and will be in line with the contributors six monthly statements of account.

If the contributor closes their PRSA contract the balancing fee will then be calculated on the basis of the number of days since the last billing date to the date the PRSA is closed. It will be the value of the fund at the last billing date by the management charge and proportionately charging for the number of days from the last billing date to the date it is closed. It will be deducted automatically from your nominee bank account, which will require certain liquidity to ensure such payments can be made. Please note that the AMC will be applied on specific charging dates each year as outlined above.

Newcourt does not levy any entry charges or exit charges to your PRSA contract. However charges and associated costs for any underlying investments may vary in these respects and professional investment advice should be sought in this regard. In addition, normal transaction costs, stamp duties and certain Government levies may apply and these will be deducted automatically from the value of your assets.

Underlying Investments Charges

In addition to the charges outlined above there may be charges associated with the underlying investments you choose to invest in through your PRSA. The charges that can apply on such investments can only range from 0% to 3% per annum. Investments with charges outside this range are not allowable under the Newcourt PRSA. Such charges may include those charged on stock broking accounts, annual management fees on investment funds or charges on collective investment schemes. This is not an exhaustive list. The frequency with which charges will be deducted can vary between underlying investments. Details of the exact charges that you will incur will be outlined to you before investment. These charges may include one off charges and/or ongoing charges. The underlying investment charges are in addition to the AMC outlined above.

If you choose to invest in the Default Investment Strategy **("DIS")** your fund will be invested in the New Ireland Assurance PRIME 3 Fund. The underlying investment charge for the DIS is 0.5%.

This underlying investment charge will apply in addition to the AMC outlined above. This charge will be reflected in the daily unit price of the New Ireland Assurance PRIME 3 Fund.

The projected fund values in the table of benefits above have been calculated assuming an underlying investment charge of 0.5% in addition to the AMC for illustrative purposes. The projections do not assume that you invest in the Default Investment Strategy. As mentioned above the underlying investment charge can range between 0% - 3%. The actual underlying investment charge deducted from your PRSA assets will depend on the assets you choose to invest in. Once your PRSA contract is issued to you, you will be provided with a Statement of Reasonable Projection that includes a projected table of benefits based on your specific details, including any underlying investment charge that applies to the assets that you choose to invest in.

Newcourt PRSA Preliminary Disclosure Certificate

We will give you at least two months notice if there are any proposed increases in the charges outlined above. We will also issue you with a new Statement of Reasonable Projection, reflecting the increase in charges and how this will affect your projected maturity value.

For your contract, the total effect of these charges on the benefits at maturity projected above is equivalent to a single charge of 1.6% per annum of the assets held under the contract.

5. Cooling Off Period

This contract is not enforceable until a period of 30 days has elapsed from the date on which you are given a Statement of Reasonable Projection and you may cancel this contract at any time during that period.

6. Certificate

This Preliminary Disclosure Certificate has been prepared under the provisions of Section 111 of the Pensions Act, 1990 for disclosure in connection with this PRSA on 1 February 2021***.*** This PRSA is not a Standard PRSA.

Signed:

Gerard Keane

Newcourt Retirement Fund Managers Limited,

Father Mathew Hall,

131 Church Street,

Dublin 7.

Date: 1 February 2021