CLAFFEY EGAN

FINANCIAL BROKERS

SPECIALISTS IN MANAGING YOUR FINANCIAL FUTURE

TERMS OF BUSINESS & INVESTMENT GUIDE

Managing your investments
for your future

Claffey & Egan Financial Brokers are a Midlands based Financial Brokerage Company.

As Brokers we aim to give qualified advice on mortgages, a wide range of Investment, Pension, Life and General Insurance products.

Claffey & Egan Financial Brokers have over 20 year's experience in the financial service industry.

We research the entire market to identify the most suitable policy to meet our client's needs. Our recommendation, being the best fit for you, may include a single policy option or a blended option (multiple policies). We also are in a position to arrange finance and leasing to our clients.

Company Directors:
Finbar Egan and Vinny Claffey.

Terms of Business

VINFIN LIMITED T/A CLAFFEY & EGAN FINANCIAL BROKERS

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. If any material changes are made to these terms, we will notify you.

Authorisation with the Central Bank of Ireland:

Claffey & Egan Financial Brokers is regulated by the Central Bank of Ireland, as a Multi-Agency Intermediary, authorised under the Investment Intermediaries Act, 1995; as a Mortgage Intermediary authorised under the Consumer Credit Act, 1995; and as an Insurance Intermediary registered under the European Communities (Insurance Mediation) Regulations, 2005. 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 on 1890 200 469, or alternatively visit their website at www.centralbankofireland.ie to check our authorisations.

Agencies held by Claffey & Egan:

Claffey & Egan Financial Brokers hold written appointments with the following life assurance providers and/or investment companies; Irish Life, New Ireland, Zurich, Royal London, Friends First, Standard Life, Aviva, BCP, Wealth Options, EBS, PIBA Mortgages, ITC, Haven, Merrion Capital Group, Greenman Open, Dilosk and Phoenix Ireland.

Our Services:

Claffey & Egan Financial Brokers are a member of Brokers Ireland. As a member of Brokers Ireland we can generally give consumers a greater choice of provider. Claffey & Egan Financial Brokers review the market for Savings, Protection, Investments and Pensions products on a fair analysis basis.

As a Financial Broker Claffey & Egan are required to hold a minimum of 6 insurance agencies.
Our principal business is to provide advice and arrange transactions on behalf of clients, in relation to protection, pensions, investments, mortgages and also to refer general insurance products. A full list of all insurers, product producers, lending agencies, are included in this document.

Protection:

As a Multi-Agency Intermediary, Claffey & Egan Financial Brokers can provide advice on and arrange products from the following range: life cover, serious illness cover, income protection, income on death, whole of life cover, business protection, directors insurance and inheritance insurance. We will provide assistance to you for any queries you may have in relation to the 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. It is however, 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 PHI and serious illness protection.

Fair Analysis:

Claffey & Egan use Best Advice in order to ensure that the best value for money is achieved for our clients. Best Advice is a comparison website which compares the six main Life companies in Ireland.

Claffey & Egan also use Clear Choice, which are a product only based comparison website, in order to ensure that the product recommended is the most suitable for the client's needs.

The objectives of Clear Choice are to raise the knowledge, standards & quality of advice within the financial planning industry.

Claffey & Egan Financial brokers use a specific designed mechanism from Clear Choice, to analyse and identify the most suitable protection product on the market for you, with your stated objectives and preferences in mind.

Retirement Planning:

As a Multi-Agency Intermediary. Claffey & Egan Financial Brokers can provide advice on and arrange any products from the following range: PRSA's, (both Standard & Non-Standard), Personal pensions, SSAP's, Executive pensions and company pensions. We will assess your risk profile through our Attitude to Risk Questionnaire and then endeavour to match your investment strategy with your risk profile. We will provide assistance to you for any queries you may have in relation to the 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. It is however, your responsibility to read the policy documents, literature and brochures to ensure that you understand the nature of the policy.

Post Retirement Planning:

As a Multi-Agency Intermediary, Claffey & Egan Financial Brokers can provide advice on and arrange products from the following range: Annuities (both Standard &capital protected) and ARF's (Approved Retirement Funds). We will assess your risk profile through our Attitude to Risk Questionnaire and then endeavour to match your investment strategy with your risk profile. We will provide assistance to you for any queries you may have in relation to the 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. It is however, your responsibility to read the policy documents, literature and brochures to ensure that you understand the nature of the policy.

Investments:

As a Multi-Agency Intermediary, Claffey & Egan Financial Brokers can provide advice on and arrange products from the following range: regular savings plans, lump sum investments (both capital protected and non capital protected). We will assess your risk profile through our Attitude to Risk Questionnaire and then endeavour to match your investment strategy with your risk profile. We will provide assistance to you for any queries you may have in relation to the 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. It is however, your responsibility to read the policy documents, literature and brochures to ensure that you understand the nature of the policy cover.

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 create the Investment Products we advise on, and it will be their documentation we are relying and providing on when advising you on sustainable investments. All information regarding Sustainable Finance Disclosures will be adhered to by the Product Producers and their brochures and documents will outline their disclosures.

Non-Life:

We refer our non life business to the following companies and they will provide quotes to our clients; Zurich, Richardson Insurance, Planalife and Irish Health Insurance, in relation to products from the following range: household, motor, commercial, public liability, employer liability, health insurance and travel insurance. We will also offer assistance to you in relation to processing claims on policies taken out with us, and in seeking renewal terms on your cover. To ensure continuity of cover, where you have an existing policy which is due to expire, and where we have been unable to contact you, Zurich, Irish Health Insurance Ltd., Planalife and The Crotty Group / Get Cover may put continuing cover in force, whilst awaiting your instruction. You have the right not to avail of this service.

Mortgage:

Through the lenders, or other undertakings with which we hold an agency, Claffey & Egan Financial Brokers can provide advice on, and arrange products from the following range: fixed-rate loans, variable rate mortgages, capital & interest mortgages, interest-only mortgages, endowment mortgages, pension mortgages, 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 request.

We also refer some of our Mortgages through PIBA Mortgages to PTSB, Haven, Pepper as they can provide the specialist expertise required to take mortgages from start to completion. We also have an agency with Dilosk and Broker Assist. We will always advise clients if we are referring them to a third party and make them aware of any potential costs charged by that 3rd party.

Disclosure of Information:

Any failure to disclose material information may invalidate your claim and render your policy void. Claffey & Egan Financial Brokers are remunerated by fees or commission, from product producers or lenders on the completion of business.

Fees:

Any fees being charged to the client directly by Claffey & Egan will be disclosed and agreed with the client before any business is transacted. Fees may be charged in relation to commissioned based work. Claffey & Egan Financial Brokers provide the option for our clients to pay us fees rather than the Life Companies paying us. Initial commission will be accepted in cases where the client wishes to do so.

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.

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 of changes in your circumstances, or request a review, may result in you having insufficient insurance cover and/or inappropriate investments.

Trail Fund Based Commission:

When we apply a Trail Fund management charge we provide the following services.

- **A full personal risk assessment (Attitude to Risk ie: A.T.R) through EValue Ltd.**
- **Complete a full market analysis and identify most suitable funds for your pension and investment.**
- **We will provide a personalised investment report suitable for your needs and objectives.**
- **You will receive a yearly investment report, review, market updates and portfolio re-balancing, if required, from Claffey & Egan Financial Brokers.**
- **A market update and review, and how this may potentially affect your funds performance.**
- **An annual Benefits statement from the Life Company you are invested in.**

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 payment by clients:

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 the details of such provisions. Mortgage lenders may seek early repayment of a loan and interest, if you default on your repayments. Your home is at risk, if you do not maintain your agreed repayments.

Complaints:

Verbal complaints will be acknowledged in writing within 5 working days. We will carry out a full investigation and revert in writing in relation to same. If you are not satisfied we will ask you to submit your compaint in writing. 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 Ombudsman, or the Pensions Ombudsman. A full copy of our complaints procedure is available on request.

Data Protection:

Claffey & Egan Financial Brokers endeavours to fully comply with the requirements of the Data Protection Acts, 1988 and 2003 at all times. 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.

Compensation Scheme:

We are members of the Investor Compensation Scheme, operated by the Investor Compensation Company Ltd. (ICCL). The Investor Compensation Act, 1988 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 ICCL was established under the 1988 Act, to operate such a compensation scheme, and our firm is a member of this scheme. For further information, please contact the Investor Compensation Company Ltd. At (01) 224 4955.

GDPR

Claffey & Egan Financial Brokers endeavours to fully comply with the requirements of the European Union - wide framework known as the General Data Protection Regulation (GDPR) which came into force across the E.U on 25 May 2018.

INVESTMENT GUIDE

This booklet is designed to help you understand investment risk.
It's purpose is to guide you on how an investment with a particular risk rating might behave.
This will help you decide which investment is right for you.

WHAT DO WE MEAN BY RISK ?

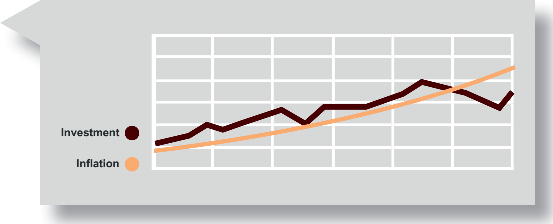
There are a number of different types of risk you need to consider before making an investment. Here are just a few to think about.

Market Risk

This is the first thing most people think about when they consider investment risk. The risk that you may lose some or all of your initial investment. How would you feel if this happened?

Inflation Risk

Although your initial investment may be intact, the investment and it's growth enjoyed may not have kept pace with the rate of inflation. This means the value of your investment at the end of your term has lower purchasing power than it would have had at the outset of your investment.



Counterparty Risk

You may invest in a product which provides a guarantee. Counterparty Risk is the risk that the institution providing the guarantee isn't able to honour its promise. This risk also applies to funds which invest in bank deposit accounts, corporate or government bonds. The risk to each party in a contract is that the counterparty will not live up to its contractual obligations. Counterparty risk is a risk to both parties and should be considered when evaluating a contract. In most financial contracts, counterparty risk is also known as "default risk".

Liquidity Risk

You might plan to invest for a long time but your circumstances can change unexpectedly. You should take into account that not all investments are easy to **exit** from early. Some may not give you the full value you might expect, others may not allow you access at all.

Concentration Risk

"All your eggs in one basket". If your wealth is concentrated in too few assets, or asset types, and these assets are exposed to a fall in the market, then your investment will suffer a significant loss, due to the lack of diversification.

Investment Suitability

How do we rate investment risk ?

Where an investment does not offer capital protection Claffey Egan apply the standardised risk rating system approved by the European Securities and Markets Authority (ESMA). ESMA is an independent committee of European Securities regulators. It's role is to help improve co-ordination between different securities regulators and act as an advisory group to assist the European Commission.

It has produced guidelines as to how investment managers should represent risk and return to consumers. It is intended that these guidelines will be adopted as the standard approach across all European fund managers.

The ESMA Risk Rating methodology uses a 7 point scale based on 5 year annualised volatility which is a measure of how sharply an investments value goes up and down. Investment theory suggests that if you have an understanding of an investments long term average annual return, and its volatility, you can give an indication of the range of returns the investment may produce over time.

Where an investment does offer some form of capital protection Claffey Egan will describe it either as a very low risk or low risk investment. A very low risk investment may contain a promise that your initial investment is safe and give certainty as to how much interest you will earn. A low risk investment may only promise that you will be entitled to some or all of your initial investment back, but not give any guarantee as to how much growth you may get.

Investment Type

Risk Rating - 1

1

1 out of 7 - Very Low Risk Investment

We would classify an investment as very low risk if it guarantees that your initial investment is safe and provides certainty as to how much growth you are likely to earn. A deposit account would be such an investment.

However, one should be aware of counterparty, inflation and liquidity risks.

Investment Type

Risk Rating - 2

2

2 out of 7 - Low Risk Investment

We would classify an investment as very low risk if it guarantees that all or a high proportion of your initial investment is safe at the end of the investment term. Such an investment may not, however, give you any promises as to how much growth you might earn.

A 'tracker bond' would be such an investment. It may promise to pay you at least 95% or 100% of your investment at the end of the term, but any growth might be dependent on the performance of an underlying stock market index or other investment.

When looking at such an investment you need to be aware of counterparty, inflation and liquidity risks as well as the specific risks associated with the underlying investment any growth may be linked to.

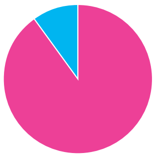
* Compounding may increase the gains or losses in an investment

Could be suitable for an investor who is looking for the potential to beat cash returns over the medium term but who is not comfortable with fluctuations in the value of their investment in the short term. It will not guarantee to protect the initial amount invested so is designed for someone who accepts that a little risk, is required in order to generate growth.

Investment Type

3

3 out of 7 - Low to Medium Risk Investment



- Defensive Assets - 90%
- Growth Assets - 10%

2.75% Long Term Average Expected Return

This is an annual figure and does not take account of charges or inflation.

RISK RATING - 3

A diversified investment will have a mix of defensive and growth assets.

This mix will determine how risky the fund is and what would be a reasonable long term growth potential.

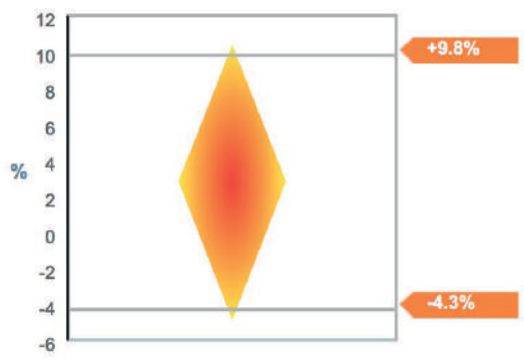
The more growth assets held, the riskier the investment but the higher the long term growth potential.

A fund with a risk rating of 3 is likely to have a significant weighting to defensive assets. Based on Society of Actuaries in Ireland guidelines, 2.75% p.a. would be a reasonable long term average expected return for such an investment.

Investment Suitability - Short Term Volatility

3 Long Term Average 2.75%

Range of probable outcomes in any 12 month period*



Although it is reasonable to have a long term average expected return, the returns in any one year are going to be higher or lower than this.

Depending on the expected volatility of the investment, it is possible to estimate a range of annual outcomes which would be deemed 'normal' for that type of investment.

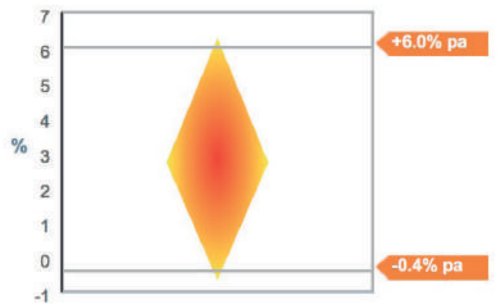
The graphic opposite illustrates the likely spread of annual returns. You will see that the majority of the time returns will be around the long term expected average. However, more extreme outcomes are probable.

*This assumes 95% probability, more extreme outcomes are possible.

Investment Suitability - Long Term Volatility

3 Long Term Average 2.75%

Range of possible outcomes after 5 years investment term*



Over the life of your investment you will experience both positive and negative returns.

The longer your investment period, the closer the predicted range of annual returns will get to the long term average.

However, you should also note the impact of compounding. A small annual profit or loss can have a significant impact on the value of your investment over a long period of 5-10 years, or an even longer term.

*This assumes 95% probability, more extreme outcomes are possible.

* Compounding may increase the gains or losses in an investment

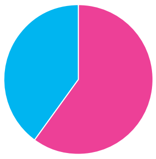
INVESTMENT SUITABILITY

Could be suitable for an investor who is looking for the potential to beat cash returns over the medium term but who is not comfortable with large fluctuations in the value of their investment in the short term. It will not guarantee to protect the initial amount invested so is designed for someone who accepts that some risk, is required in order to generate growth.

Investment Type

4

4 out of 7 - Medium Risk Investment



Defensive Assets - 60%

Growth Assets - 40%

3.50%

Long Term Average Expected Return

This is an annual figure and does not take account of charges or inflation

RISK RATING - 4

A diversified investment will have a mix of defensive and growth assets.

This mix will determine how risky the fund is and what would be a reasonable long term growth potential.

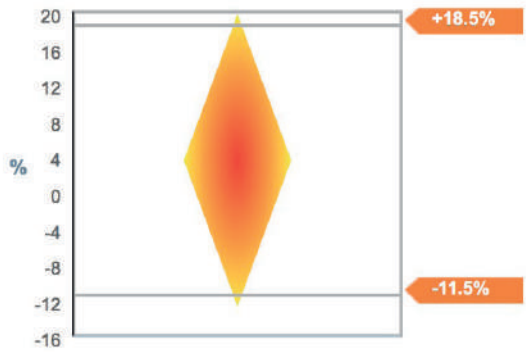
The more growth assets held, the riskier the investment but the higher the long term growth potential.

A fund with a risk rating of 4 is likely to have a good balance between defensive and growth assets. Based on Society of Actuaries in Ireland guidelines, 3.50% p.a. would be a reasonable long term average expected return for such an investment.

Investment Suitability - Short Term Volatility

4 Long Term Average 3.50%

Range of probable outcomes in any 12 month period*



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The graphic opposite illustrates the likely spread of annual returns. You will see that the majority of the time returns will be around the long term expected average. However, more extreme outcomes are probable.

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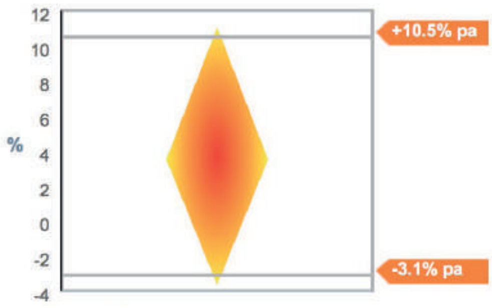
Investment Suitability - Long Term Volatility

4 Long Term Average 3.50%

Range of possible outcomes after 5 years investment term*



Over the life of your investment you will experience both positive and negative returns.

The longer your investment period, the closer the predicted range of annual returns will get to the long term average.

However, you should also note the impact of compounding. A small annual profit or loss can have a significant impact on the value of your investment over a long period of 5-10 years, or an even longer term.

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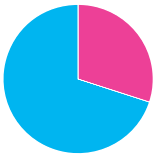
* Compounding may increase the gains or losses in an investment

Could be suitable for an investor who is looking for the potential to beat cash returns over the medium term but who is comfortable with fluctuations in the value of their investment in the short term. It will not guarantee to protect the initial amount invested so is designed for someone who accepts that risk, is required in order to generate growth.

Investment Type

5

5 out of 7 - Medium to High Risk Investment



Defensive Assets - 30%

Growth Assets - 70%

4.25%

Long Term Average Expected Return

This is an annual figure and does not take account of charges or inflation

RISK RATING - 5

A diversified investment will have a mix of defensive and growth assets.

This mix will determine how risky the fund is and what would be a reasonable long term growth potential.

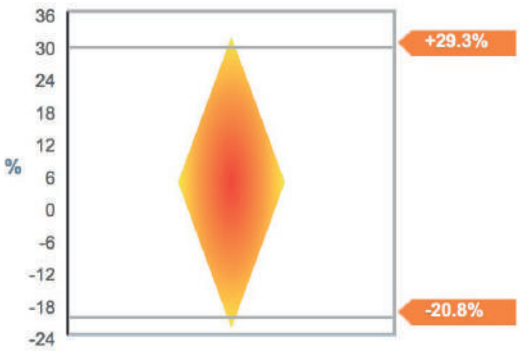
The more growth assets held, the riskier the investment but the higher the potential for long term growth.

A fund with a risk rating of 5 is likely to have a higher weighting in growth assets. Based on Society of Actuaries in Ireland guidelines, 4.25% p.a. would be a reasonable long term average expected return for such an investment.

Investment Suitability - Short Term Volatility

5 Long Term Average 4.25%

Range of probable outcomes in any 12 month period*



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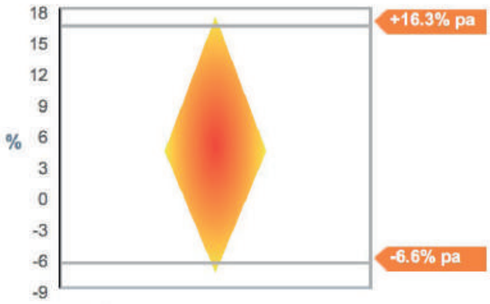
Investment Suitability - Long Term Volatility

5 Long Term Average 4.25%

Range of possible outcomes after 5 years investment term*



Over the life of your investment you will experience both positive and negative returns.

The longer your investment period, the closer the predicted range of annual returns will get to the long term average.

However, you should also note the impact of compounding. A small annual profit or loss can have a significant impact on the value of your investment over a long period of 5-10 years, or an even longer term.

*This assumes 95% probability, more extreme outcomes are possible.

* Compounding may increase the gains or losses in an investment

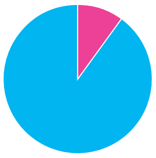
Could be suitable for an investor who is looking for the potential to beat cash returns over the medium term and who is comfortable with large fluctuations in the value of their investment in the short term. It will not guarantee to protect the initial amount invested so is designed for someone who accepts that greater risk, is required in order to generate the potential highest returns. This type of investor understands that there will be large changes in the value of their investment over time.

Investment Type

RISK RATING - 6

6

6 out of 7 - High Risk Investment



Defensive Assets - 10%

Growth Assets - 90%

4.75%

Long Term Average Expected Return

This is an annual figure and does not take account of charges or inflation

A diversified investment will have a mix of defensive and growth assets.

This mix will determine how risky the fund is and what would be a reasonable long term growth potential.

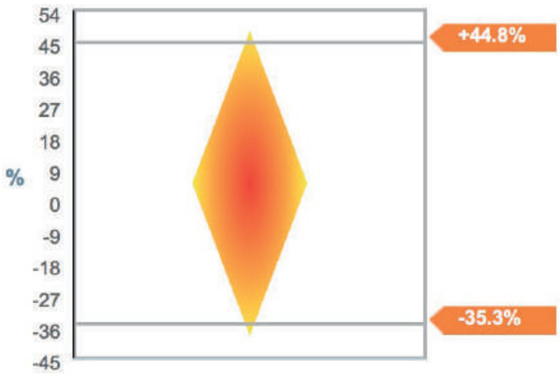
The more growth assets held, the riskier the investment but the higher the long term growth potential.

A fund with a risk rating of 6 is likely to have a significant weighting of growth assets. Based on Society of Actuaries in Ireland guidelines, 4.75% p.a. would be a reasonable long term average expected return for such an investment.

Investment Suitability - Short Term Volatility

6 Long Term Average 4.75%

Range of probable outcomes in any 12 month period*



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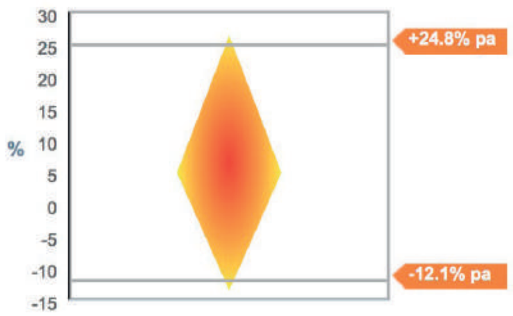
Investment Suitability - Long Term Volatility

6 Long Term Average 4.75%

Range of possible outcomes after 5 years investment term*



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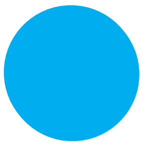
Investment Type

RISK RATING - 7

7

7 out of 7 - Very High Risk Investment



Growth Assets - 100%

5.00%

Long Term Average Expected Return

This is an annual figure and does not take account of charges or inflation

A diversified investment will have a mix of defensive and growth assets.

This mix will determine how risky the fund is and what would be a reasonable long term growth potential.

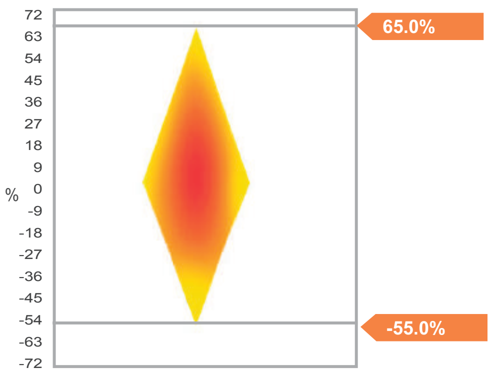
The more growth assets held, the riskier the investment but the higher the long term growth potential.

A fund with a risk rating of 7 is likely to have a significant weighting of growth assets. Based on Society of Actuaries in Ireland guidelines, 5.00% p.a. would be a reasonable long term average expected return for such an investment.

Investment Suitability - Short Term Volatility

7 Long Term Average 5.00%

Range of probable outcomes in any 12 month period*



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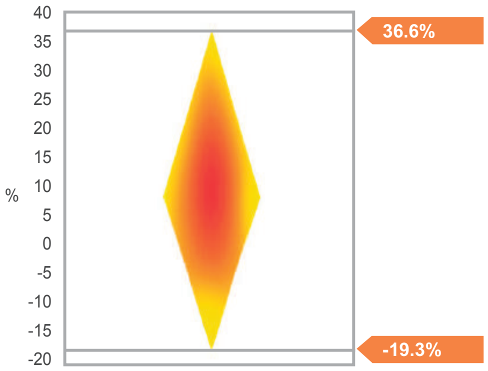
Investment Suitability - Long Term Volatility

7 Long Term Average 5.00%

Range of possible outcomes after 5 years investment term*



Over the life of your investment you will experience both positive and negative returns.

The longer your investment period, the closer the predicted range of annual returns will get to the long term average.

However, you should also note the impact of compounding. A small annual profit or loss can have a significant impact on the value of your investment over a long period of 5-10 years, or an even longer term.

*This assumes 95% probability, more extreme outcomes are possible.

* Compounding may increase the gains or losses in an investment

RECOMMENDATION

Based on your Financial Advisors consultation with you, they will recommend an investment product with a particular risk rating on the ESMA scale or similar risk profiling scales.

Risk Rating 1 out of 7 - Very Low Risk Investment
Annualised Volatility Band: 0.0% to 0.5%

Risk Rating 2 out of 7 - Low Risk Investment
Annualised Volatility Band: 0.5% to 2.0%

Risk Rating 3 out of 7 - Low to Medium Risk Investment
Annualised Volatility Band: 2.0% to 5.0%

Risk Rating 4 out of 7 - Medium Risk Investment
Annualised Volatility Band: 5.0% to 10.0%

Risk Rating 5 out of 7 - Medium to High Risk Investment
Annualised Volatility Band: 10.0% to 15.0%

Risk Rating 6 out of 7 - High Risk Investment
Annualised Volatility Band: 15.0% to 25.0%

Risk Rating 7 out of 7 - Very High Risk Investment
Annualised Volatility Band: 25.0%+

It is important to understand that your own capacity to take on risk, and prevailing market conditions, do change over time and you should therefore review your investments regularly to confirm if they are still suitable for your needs.

It is important to be aware that there are a number of different ways to look at assessing appetite for risk and it is not an exact science. This process does not take into account all your personal circumstances and therefore the calculations may not be appropriate to your personal circumstances. You should not rely solely on this process to make an investment decision. In all cases we recommend that you consult a Financial Broker or Advisor who will conduct a full financial review and fact-find with you and advise you accordingly.

The calculations provided by the Claffey & Egan Investment Suitability Process are for general illustration purposes only, based on the limited inputs you have given and assumptions made. Although Claffey & Egan endeavours to ensure that this 'Investment Suitability Process' is accurate, we cannot guarantee it is free of errors or suitable for any user's intended purposes. To the extent permitted by law, under no circumstances will Claffey & Egan be liable for any investment loss or damage caused by a user's reliance on information obtained by using this process.

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Phone: 090 6454550
Ballinahown, Athlone, Co. Westmeath
www.cefinance.ie

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