

**CASE COMP/ AT.40511 INSURANCE IRELAND:
INSURANCE CLAIMS DATABASE AND CONDITIONS OF ACCESS**

**COMMITMENTS OFFERED TO THE EUROPEAN COMMISSION UNDER ARTICLE 9 OF
COUNCIL REGULATION (EC) NO 1/2003**

In accordance with Article 9 of Council Regulation (EC) No 1/2003 (“**Regulation 1/2003**”), Insurance Ireland (Member Association) Company Limited by Guarantee (“**Insurance Ireland**”) offers the following commitments (“**Commitments**”) to the European Commission (the “**Commission**”) with a view to meeting the Commission’s preliminary concerns as set out in the Commission’s Statement of Objections dated 18 June 2021 (“**SO**”) in the context of its investigation in Case COMP/AT.40511, and enabling the Commission to adopt a decision pursuant to Article 9 Regulation 1/2003 confirming that the Commitments address its concerns (“**Commitments Decision**”).

The objective of these Commitments is to put in place clearly defined procedures to ensure that decisions regarding access to the InsuranceLink database are made on a fair, transparent, objective and non-discriminatory basis in a manner that is independent of the Board of Insurance Ireland, and to make clear that users of the InsuranceLink database are not required to be either full or associate members of Insurance Ireland. In addition, the Commitments are intended to provide a fair, transparent, objective and non-discriminatory basis for dealing with applications for membership of Insurance Ireland.

Consistent with Article 9 of Regulation 1/2003, these Commitments may not be interpreted as an acknowledgement by Insurance Ireland that it has infringed competition law.

This text shall be interpreted in the light of the SO, the Commitments Decision, the general framework of Community law, and in particular in the light of Regulation 1/2003.

SECTION A: DEFINITIONS

1. For the purpose of the Commitments, the terms listed below shall have the following meaning:

Associate Member means an entity that is an associate member of Insurance Ireland as described in the Terms and Conditions of Associate Membership of Insurance Ireland;

Associate Member Application Form means the form to be completed and submitted to Insurance Ireland as part of an application to become an Associate Member, a copy of which is attached in Annex 12;

Associate Member Criteria means the criteria to become an Associate Member as set out in the Terms and Conditions of Associate Membership, a copy of which is attached in Annex 10;

Code means the Code of Practice on Data Protection for the Insurance Sector 2013, which is available on the website of Insurance Ireland
(https://www.insuranceireland.eu/media/documents/20130626_Code_of_Practice_Final.pdf);

Conflict of Interest means any conflict of interest that impairs the Monitoring Trustee’s objectivity and independence in discharging its duties under the Commitments;

Effective Date means the date of notification of the Commitments Decision by which the Commission makes the Commitments binding on Insurance Ireland;

Event of Force Majeure means occurrence of (i) abnormal, unforeseeable and external circumstances and (ii) acts of God, limiting Insurance Ireland’s ability to comply with the Commitments that are outside the control of Insurance Ireland and the consequences of which could not, despite the exercise by Insurance Ireland of all due care, have been avoided. The

exercise of due care includes taking appropriate steps to guard against the consequences of abnormal, unforeseeable and external circumstances and acts of God without making unreasonable sacrifices;

Full Member means an entity that is a member of Insurance Ireland under the Insurance Ireland Constitution (a copy of which is provided at Annex 8) and as described in the Rules relating to Full Membership of Insurance Ireland;

Full Member Application Form means the form to be completed and submitted to Insurance Ireland as part of an application to become a Full Member, a copy of which is attached in Annex 11;

Full Member Criteria means the criteria to become a Full Member as set out in the Rules Relating to Admission to Full Membership, a copy of which is attached in Annex 9;

Insurance Ireland Constitution means the Constitution of Insurance Ireland (Member Association) Company Limited by Guarantee, which is available on the Insurance Ireland website (<https://www.insuranceireland.eu/about-us/about-us/insurance-ireland-membership/documents/annex8>) and a copy of which is attached in Annex 8. For the avoidance of doubt, the Insurance Ireland Constitution shall be read in conformity with the Commitments;

InsuranceLink means the InsuranceLink database and all features available to users of the InsuranceLink database, including the facility to request further information;

InsuranceLink Applicant means an entity applying to use InsuranceLink;

InsuranceLink Application Form means the form to be completed and submitted to Insurance Ireland as part of an application to become an InsuranceLink User, a copy of which is attached in Annex 2;

InsuranceLink Application Officer means the individual(s) of a sufficient level of seniority (i.e. manager level or above) designated by Insurance Ireland to process and determine applications for access to InsuranceLink pursuant to the InsuranceLink Application Procedure;

InsuranceLink Application Procedure means the procedure for application for access to InsuranceLink as set out in Annex 4;

InsuranceLink Criteria for Access means the criteria for accessing InsuranceLink set out in Annex 1;

InsuranceLink Oversight Committee means the governance body to be established by Insurance Ireland pursuant to paragraph 2.7 to provide, in accordance with the Terms of Reference of the InsuranceLink Oversight Committee, independent oversight of matters regarding access to InsuranceLink, including the hearing of appeals relating to: (i) any decision to not permit an InsuranceLink Applicant to access InsuranceLink or any of its facilities in accordance with the InsuranceLink Criteria for Access; (ii) any decision to withdraw, restrict or *de facto* deny an InsuranceLink User's rights of access (once granted) to InsuranceLink or any of its facilities; (iii) a failure to comply with any aspect of the InsuranceLink Application Procedure resulting in a delay to the processing of applications; or (iv) a failure to calculate the fees charged to an InsuranceLink User for access to InsuranceLink in accordance with the fee structure in place for InsuranceLink;

InsuranceLink Oversight Committee Rules of Procedure for Appeals means the rules governing appeals to the InsuranceLink Oversight Committee set out in Annex 5;

InsuranceLink Sub-Committee means a standing sub-committee of the Board of Insurance Ireland established in connection with the InsuranceLink Application procedure to review: (i) any decision to not permit an InsuranceLink Applicant to access InsuranceLink or any of its facilities in accordance with the InsuranceLink Criteria for Access; (ii) any decision to withdraw, restrict or *de facto* deny an InsuranceLink User's rights of access (once granted) to InsuranceLink or any of its facilities; (iii) a failure to comply with any aspect of the InsuranceLink Application Procedure resulting in a delay to the processing of applications; or (iv) a failure to calculate the fees charged to an InsuranceLink User for access to InsuranceLink in accordance with the fee structure in place for InsuranceLink;

InsuranceLink Terms of Access Agreement means the agreement setting out the terms and conditions of use of InsuranceLink to be entered into between Insurance Ireland and each InsuranceLink User, a copy of which is attached in Annex 3;

InsuranceLink User means an entity that has been granted access to InsuranceLink;

InsuranceLink User Guide means the document that sets out details of all of the features of InsuranceLink, including the facility to request further information, and how to use those features;

Membership Appeal Board means the independent body to be established by Insurance Ireland pursuant to paragraph 4.8;

Membership Appeal Board Rules of Procedure means the rules governing the Membership Appeal Board;

Membership Applicant means an entity applying to become a Full Member or an Associate Member of Insurance Ireland;

Membership Application Officer means an individual of a sufficient level of seniority (i.e. manager level or above) appointed by Insurance Ireland to process and determine applications to be admitted as a Full Member or Associate Member pursuant to the Membership Application Procedure;

Membership Application Procedure means the procedure set out in Annex 13 for processing applications to be admitted as a Full Member or as an Associate Member;

Monitoring Trustee means the monitoring trustee appointed pursuant to Annex 15 of these Commitments;

Rules Relating to Admission to Full Membership means the document setting out the criteria to become a Full Member of Insurance Ireland, which is to be adopted by resolution of the Board of Directors of Insurance Ireland, a copy of which is attached in Annex 9;

System Sub-Contractor means the party that, under contract, provides the internet hosting, maintenance, communications and related services to Insurance Ireland in respect of InsuranceLink;

Terms and Conditions of Associate Membership of Insurance Ireland means the document setting out the terms and conditions of associate membership of Insurance Ireland, which is to be adopted by resolution of the Board of Directors of Insurance Ireland, a copy of which is attached in Annex 10;

Terms of Reference of the InsuranceLink Oversight Committee means the document setting out the terms of reference of the InsuranceLink Oversight Committee, which is available

on the website of Insurance Ireland (<https://www.insuranceireland.eu/member-services/shared-services/insurance-link.eu/documents/annex6>) and a copy of which is attached in Annex 6.

SECTION B: THE COMMITMENTS

ACCESS TO INSURANCELINK

2. Insurance Ireland undertakes to:

- 2.1. De-couple access to InsuranceLink from membership of Insurance Ireland, such that there will be no requirement for an InsuranceLink User to be, or become, a member of Insurance Ireland in order to access InsuranceLink or avail of any of its functions. In the case of entities operating by way of delegated authority, there is also no requirement for the insurer on whose behalf they act to be, or become, a member of Insurance Ireland in order for the entity to access InsuranceLink. Access to InsuranceLink will be available on a fair, objective, transparent and non-discriminatory basis to any InsuranceLink Applicant that meets the InsuranceLink Criteria for Access as set out in these Commitments, including, for the avoidance of doubt, InsuranceLink Applicants that are operating on a freedom of establishment or freedom of services basis under European Union law;
- 2.2. Adopt the fair, objective, transparent and non-discriminatory criteria for access to InsuranceLink set out in Annex 1 which will be applied uniformly to all applications for use of InsuranceLink;
- 2.3. Provide for the assessment of all applications for access to InsuranceLink by a designated InsuranceLink Application Officer strictly in accordance with the InsuranceLink Criteria for Access set out in Annex 1;
- 2.4. Establish the InsuranceLink Application Procedure as set out in Annex 4 and abide by the terms of that procedure in processing all applications for access to InsuranceLink;
- 2.5. Designate InsuranceLink Application Officers as set out in Annex 4, who will have responsibility for independently reviewing and determining applications for access to InsuranceLink in accordance with the InsuranceLink Application Procedure. While the InsuranceLink Application Officers will have full operational independence to determine such applications (subject to review by the InsuranceLink Sub-Committee and, on appeal, the InsuranceLink Oversight Committee), they will be accountable to the executive management of Insurance Ireland (on behalf of the Board of Insurance Ireland) in relation to the performance of their functions under the InsuranceLink Application Procedure and the executive management shall take appropriate action if an InsuranceLink Application Officer does not perform his/her functions in accordance with the InsuranceLink Application Procedure and the present Commitments;
- 2.6. Establish an InsuranceLink Sub-Committee, which shall automatically review in accordance with the InsuranceLink Application Procedure: (i) any decision to not permit an InsuranceLink Applicant to access InsuranceLink or any of its facilities in accordance with the InsuranceLink Criteria for Access; (ii) any decision to withdraw, restrict or *de facto* deny an InsuranceLink User's rights of access (once granted) to InsuranceLink or any of its facilities; (iii) a failure to comply with any aspect of the InsuranceLink Application Procedure resulting in a delay to the processing of applications; or (iv) a failure to calculate the fees charged to an InsuranceLink User for access to InsuranceLink in accordance with the fee structure in place for InsuranceLink.
- 2.7. Establish a standing InsuranceLink Oversight Committee that is independent of the Board of Insurance Ireland and whose members are nominated by bodies that are

independent of Insurance Ireland to oversee matters (including appeals) regarding access to, and ongoing use by InsuranceLink Users of, InsuranceLink in accordance with the Terms of Reference of the InsuranceLink Oversight Committee attached in Annex 6;

- 2.8. Establish a right of appeal for InsuranceLink Applicants to the InsuranceLink Oversight Committee in accordance with the InsuranceLink Oversight Committee Rules of Procedure for Appeals (attached at Annex 5) in respect of:
 - (i) decisions made, or other actions taken by the InsuranceLink Sub-Committee in relation to applications for access and/or the terms of ongoing access to InsuranceLink; or
 - (ii) where the InsuranceLink Sub-Committee has failed to take such a decision, decisions made by the InsuranceLink Application Officer in relation to applications for access and/or the terms of ongoing access to InsuranceLink; or
 - (iii) where both the InsuranceLink Application Officer and the InsuranceLink Sub-Committee have failed to take such a decision in relation to applications for access and/or the terms of ongoing access to InsuranceLink.
- 2.9. Ensure that fees for access to and use of InsuranceLink are set in accordance with the principles of a revised fee structure for InsuranceLink Users (attached at Annex 7);
- 2.10. Ensure that InsuranceLink Users are provided with details of all of the features of InsuranceLink, including the facility to request further information, and how to use the features through the provision of the InsuranceLink User Guide and that InsuranceLink Users have access to all services and facilities of InsuranceLink in accordance with the InsuranceLink Terms of Access;
- 2.11. Ensure that any changes to the operations, processes and functionalities of InsuranceLink are notified to InsuranceLink Users within 5 days of their implementation and that access is granted to InsuranceLink Users when new functionalities are implemented.
- 2.12. Subject to any redactions strictly necessary regarding confidential or commercially sensitive information, make publicly available in a clear and transparent manner on the Insurance Ireland website and instruct the System Sub-Contractor to make publicly available on the InsuranceLink website:
 - (a) The InsuranceLink Criteria for Access set out in Annex 1;
 - (b) The InsuranceLink Application Form attached in Annex 2;
 - (c) The InsuranceLink Terms of Access Agreement attached in Annex 3;
 - (d) The InsuranceLink Application Procedure set out in Annex 4;
 - (e) The InsuranceLink Oversight Committee Rules of Procedure for Appeals set out in Annex 5;
 - (f) The Terms of Reference of the InsuranceLink Oversight Committee attached in Annex 6;
 - (g) The principles of a revised fee structure for InsuranceLink Users attached in Annex 7;

- (h) The InsuranceLink User Guide; and
- (i) The Code.

Implementation

3. Insurance Ireland shall:

- 3.1. Adopt and make publically available on the Insurance Ireland website within 20 business days of the Effective Date all of the following:
 - (a) The InsuranceLink Criteria for Access set out in Annex 1;
 - (b) The InsuranceLink Application Form attached in Annex 2;
 - (c) The InsuranceLink Terms of Access Agreement attached in Annex 3;
 - (d) The InsuranceLink Application Procedure set out in Annex 4; and
 - (e) The InsuranceLink Oversight Committee Rules of Procedure for Appeals set out in Annex 5; and
 - (f) The Terms of Reference of the InsuranceLink Oversight Committee attached in Annex 6.
- 3.2. Instruct the System Sub-Contractor within 20 business days of the Effective Date to undertake all of the following:
 - (a) Make available on the website of InsuranceLink the InsuranceLink User Guide;
 - (b) Send the InsuranceLink User Guide to all existing InsuranceLink Users;
 - (c) Provide the InsuranceLink User Guide to each new InsuranceLink User within 5 business days following the granting of access to InsuranceLink to that InsuranceLink User; and
 - (d) Where the InsuranceLink User Guide is updated, provide the updated version to all InsuranceLink Users within 10 business days of the update and make it available on the InsuranceLink website the updated version.
- 3.3. Instruct the System Sub-Contractor within 20 business days of the Effective Date to make available on the website of InsuranceLink all of the following:
 - (a) The InsuranceLink Criteria for Access set out in Annex 1;
 - (b) The InsuranceLink Application Form attached in Annex 2;
 - (c) The InsuranceLink Terms of Access Agreement attached in Annex 3;
 - (d) The InsuranceLink Application Procedure set out in Annex 4;
 - (e) The InsuranceLink Oversight Committee Rules of Procedure for Appeals set out in Annex 5;
 - (f) The Terms of Reference of the InsuranceLink Oversight Committee attached in Annex 6;

- (g) The principles of a revised fee structure for InsuranceLink Users attached in Annex 7; and
 - (h) The Code.
- 3.4. Establish the InsuranceLink Sub-Committee within 20 business days of the Effective Date;
 - 3.5. Designate the InsuranceLink Application Officers within 20 business days of the Effective Date;
 - 3.6. Establish the InsuranceLink Oversight Committee within 30 business days of the Effective Date or by no later than 29 August 2022; and
 - 3.7. Following approval by the InsuranceLink Oversight Committee, introduce revised fees for the use of InsuranceLink set in accordance with principles of a revised fee structure for InsuranceLink Users attached in Annex 7 within 30 business days of the Effective Date or by no later than 29 August 2022 upon agreement with the System Sub-Contractor.

MEMBERSHIP OF INSURANCE IRELAND

- 4. Insurance Ireland undertakes to:
 - 4.1. Adopt the fair, objective, transparent and non-discriminatory criteria for full membership of Insurance Ireland set out in the Rules Relating to Admission to Full Membership, a copy of which is attached in Annex 9, which will be applied uniformly to all applications to be admitted as a Full Member;
 - 4.2. Adopt the fair, objective, transparent and non-discriminatory criteria for associate membership of Insurance Ireland set out in the Terms and Conditions of Associate Membership of Insurance Ireland, a copy of which is attached in Annex 10, which will be applied uniformly to all applications to be admitted as an Associate Member;
 - 4.3. Remove the criterion in force prior to the coming into operation of these Commitments that a Membership Applicant was required to have been in operation for one year;
 - 4.4. Remove the criterion in force prior to the coming into operation of these Commitments that an applicant to be admitted as an Associate Member was required to be sponsored by an existing Full Member;
 - 4.5. Appoint designated Membership Application Officers who will have responsibility (subject to the rights of review and appeal outlined below) for the independent assessment of all applications to be admitted, as the case may be, as:
 - (i) a Full Member strictly in accordance with the Full Member Criteria set out in the Rules Relating to Admission to Full Membership; or
 - (ii) an Associate Member strictly in accordance with the Associate Member Criteria set out the Terms and Conditions of Associate Membership of Insurance Ireland;
 - 4.6. Establish the Membership Application Procedure as set out in Annex 13 to be applied by Membership Application Officers in processing all applications by Membership Applicants. The Membership Application Officers will have operational independence in determining such applications, subject to review (as outlined in paragraphs 4.7 and 4.8 below): (i) by the Board of Insurance Ireland (or a sub-committee thereof); and (ii)

on appeal, by the Membership Appeal Board. However, Membership Application Officers shall be accountable to the executive management of Insurance Ireland (on behalf of the Board of Insurance Ireland) in relation to the performance of their functions under the Membership Application Procedure and in accordance with these Commitments. The executive management of Insurance Ireland shall take appropriate action if a Membership Application Officer does not perform his/her functions in accordance with the Membership Application Procedure and in accordance with these Commitments;

- 4.7. Provide that the Board of Insurance Ireland (or a sub-committee of the Board) shall automatically review only those decisions made by the Membership Application Officers that a Membership Applicant does not meet, as applicable, the Full Member Criteria or the Associate Member Criteria, as set out in paragraph 2.9 of the Membership Application Procedure;
- 4.8. Establish a right of appeal for Membership Applicants to the Membership Appeal Board in respect of decisions made by the Board of Insurance Ireland (or a sub-committee of the Board) in relation to applications for full membership or associate membership in accordance with paragraph 3.1 of the Membership Appeal Board Rules of Procedure (attached at Annex 14). The Membership Appeal Board shall be independent of the Board of Insurance Ireland and be composed of independent adjudicators having relevant expertise;
- 4.9. Make publicly available in a clear and transparent manner on the Insurance Ireland website:
 - (a) The Insurance Ireland Constitution, a copy of the current version of which is attached in Annex 8. For the avoidance of doubt, the Insurance Ireland Constitution shall be read in conformity with the Commitments;
 - (b) The Rules Relating to Admission to Full Membership attached in Annex 9;
 - (c) The Terms and Conditions of Associate Membership of Insurance Ireland attached in Annex 10;
 - (d) The Full Member Application Form attached in Annex 11;
 - (e) The Associate Member Application Form attached in Annex 12;
 - (f) The Membership Application Procedure set out in Annex 13;
 - (g) The Membership Appeal Board Rules of Procedure set out in Annex 14;
 - (h) Details of the services and facilities available respectively to Full Members and Associate Members.
- 4.10. In setting the fees applicable for Full Members and Associate Members, Insurance Ireland will ensure that such fees are determined and applied in a manner that is fair, objective, transparent and non-discriminatory.

Implementation

5. Insurance Ireland shall:
 - 5.1. Make the Insurance Ireland Constitution publicly available on the Insurance Ireland website within 20 business days of the Effective Date. For the avoidance of doubt, the Insurance Ireland Constitution shall be read in conformity with the Commitments;

- 5.2. Adopt and make publically available on the Insurance Ireland website within 20 business days of the Effective Date:
- (a) The Rules Relating to Admission to Full Membership attached in Annex 9;
 - (b) The Terms and Conditions of Associate Membership of Insurance Ireland attached in Annex 10;
 - (c) The Full Member Application Form attached in Annex 11;
 - (d) The Associate Member Application Form attached in Annex 12;
 - (e) The Membership Application Procedure attached in Annex 13; and
 - (f) The Membership Appeal Board Rules of Procedure attached in Annex 14.
- 5.3. Designate the Membership Application Officers within 20 business days of the Effective Date.
- 5.4. Establish the Membership Appeal Board within 30 business days of the Effective Date or by no later than 29 August 2022.

SECTION C: DURATION, REPORTING, REVIEW AND NON-CIRCUMVENTION

Duration

6. These Commitments shall remain in force for a period of ten years starting from the Effective Date.

Appointment of the Monitoring Trustee

7. Insurance Ireland shall appoint the Monitoring Trustee to monitor compliance with these Commitments from the Effective Date until the end of the duration of the Commitments in accordance with Annex 15 to these Commitments.

Review and Force Majeure

8. Without prejudice to Article 9.2(a) of Regulation 1/2003, in case of an Event of Force Majeure, Insurance Ireland will submit to the Commission evidence demonstrating that event, substantiate how Insurance Ireland has fully exercised due care as required, and demonstrate that the event has an insurmountable impact on Insurance Ireland's ability to comply with its obligations under the Commitments. To the extent it is confirmed by the Commission that Insurance Ireland is partially or entirely unable to comply with its obligations under the Commitments due to an Event of Force Majeure, Insurance Ireland will be relieved of the relevant obligations for the period that the inability to comply exists.
9. Insurance Ireland reserves the right to:
- 9.1. Amend the InsuranceLink Criteria for Access, the InsuranceLink Application Form, the InsuranceLink Application Procedure, the InsuranceLink Oversight Committee Rules of Procedure for Appeals and/or the Terms of Reference of the InsuranceLink Oversight Committee in light of relevant regulatory or legal developments or experience in the application of the InsuranceLink application process. Any such amendment shall pursue the objective of ensuring that the fair, objective, transparent and non-discriminatory InsuranceLink Criteria for Access are in practice applied in a consistent and equivalent manner. Any such amendment, together with an explanation of the reasons for it, shall first be notified to the Commission and enter into effect only

if the Commission agrees to it. Any such amendment shall be published as soon as it enters into force in the same way as Annexes 1, 2, 4, 5 and 6 are published;

- 9.2. Amend the InsuranceLink Terms of Access Agreement in light of relevant regulatory or legal developments, including in particular updates required in order to ensure compliance with data protection law. Any such amendment, together with an explanation of the reasons for it, shall first be notified to the Commission and enter into effect only if the Commission agrees to it. Any such amendment shall be published as soon as it enters into force in the same way as Annex 3 is published; and
- 9.3. Amend the Rules Relating to Admission to Full Membership, the Terms and Conditions of Associate Membership of Insurance Ireland, the Full Member Application Form, the Associate Member Application Form, the Membership Application Procedure and/or the Membership Appeal Board Rules of Procedure in light of relevant regulatory or legal developments or experience in the application of the membership application process. Any such amendment shall pursue the objective of ensuring that the fair, objective, transparent and non-discriminatory Full Member Criteria and Associate Member Criteria are in practice applied in a consistent manner. Any such amendment, together with an explanation of the reasons for it, shall first be notified to the Commission and enter into effect only if the Commission agrees to it. Any such amendment shall be published as soon as it enters into force in the same way as Annexes 8, 9, 10, 11, 12 and 13 are published.
10. Without prejudice to the preceding paragraphs, Insurance Ireland reserves the right to request modification of the Commitments where there has been a material change in any of the facts on which the Commitments Decision is based.
11. Reasoned requests pursuant to paragraphs 8 or 10 above shall be accompanied by a report from the Monitoring Trustee, who shall, at the same time send a non-confidential copy of the report to Insurance Ireland.
12. In the event of a proposal to transfer InsuranceLink to an independent third party during the term of the Commitments, the third party shall agree to be bound by the terms of the Commitments relating to InsuranceLink for the remaining term of the Commitments and the agreement of the third party shall be provided to the Commission for approval in advance of the transfer.

Non-Circumvention

13. Insurance Ireland shall not in any way circumvent, or attempt to circumvent, these Commitments either by action or omission.

SECTION D: FINAL PROVISIONS

14. The Commitments shall take effect upon the date of notification of the Commitments Decision by which the Commission makes the Commitments binding on Insurance Ireland, i.e. the Effective Date.
15. The Annexes to this document form an integral part of the Commitments.
16. Insurance Ireland shall publish within 5 business days of the Effective Date and keep updated these Commitments in a prominent way on the Insurance Ireland website throughout the whole period during which they remain in force.

Signed on 17 May 2022

For and on behalf of Insurance Ireland



Dónal Clancy

President

**SCHEDULE OF ANNEXES
WHICH FORM AN INTEGRAL PART OF THE COMMITMENTS**

ANNEX	DESCRIPTION
Annex 1	InsuranceLink Criteria for Access
Annex 2	InsuranceLink Application Form
Annex 3	InsuranceLink Terms of Access Agreement
Annex 4	InsuranceLink Application Procedure
Annex 5	InsuranceLink Oversight Committee Rules of Procedure for Appeals
Annex 6	Terms of Reference of the InsuranceLink Oversight Committee
Annex 7	Principles of Revised Fee Structure for InsuranceLink Users
Annex 8	Insurance Ireland Constitution
Annex 9	Rules Relating to Admission to Full Membership
Annex 10	Terms and Conditions of Associate Membership of Insurance Ireland
Annex 11	Full Member Application Form
Annex 12	Associate Member Application Form
Annex 13	Membership Application Procedure
Annex 14	Membership Appeal Board Rules of Procedure
Annex 15	Provisions relating to the Monitoring Trustee
Annex 16	InsuranceLink Application Officer Profile

ANNEX 1
INSURANCELINK CRITERIA FOR ACCESS

[Provided separately]

ANNEX 2
INSURANCELINK APPLICATION FORM

[Provided separately]

ANNEX 3
INSURANCELINK TERMS OF ACCESS AGREEMENT

[Provided separately]

ANNEX 4
INSURANCELINK APPLICATION PROCEDURE

[Provided separately]

ANNEX 5

INSURANCELINK OVERSIGHT COMMITTEE RULES OF PROCEDURE FOR APPEALS

[Provided separately]

ANNEX 6

TERMS OF REFERENCE OF THE INSURANCELINK OVERSIGHT COMMITTEE

[Provided separately]

ANNEX 7

PRINCIPLES OF REVISED FEE STRUCTURE FOR INSURANCELINK USERS

[Provided separately]

ANNEX 8
INSURANCE IRELAND CONSTITUTION

[Provided separately]

ANNEX 9

RULES RELATING TO ADMISSION TO FULL MEMBERSHIP

[Provided separately]

ANNEX 10

TERMS AND CONDITIONS OF ASSOCIATE MEMBERSHIP OF INSURANCE IRELAND

[Provided separately]

ANNEX 11
FULL MEMBER APPLICATION FORM

[Provided separately]

ANNEX 12

ASSOCIATE MEMBER APPLICATION FORM

[Provided separately]

ANNEX 13
MEMBERSHIP APPLICATION PROCEDURE

[Provided separately]

ANNEX 14

MEMBERSHIP APPEAL BOARD RULES OF PROCEDURE

[Provided separately]

ANNEX 15
PROVISIONS RELATING TO THE MONITORING TRUSTEE

[Provided separately]

ANNEX 16
INSURANCELINK APPLICATION OFFICER PROFILE

[Provided separately]