

Charitable Investment Advisor Program

Investment Guidelines

In order to ensure that Charitable Investment Advisor Program (CIAP) Assets are invested in a prudent manner, the Trustees of Fidelity Charitable® have set forth the following investment guidelines:

- CIAP Assets must be appropriately diversified at all times (e.g., across securities, issuers, sectors, or countries).
- Fidelity Charitable® reserves the right to determine whether a Giving Account® should be further diversified.
- Permissible investments: U.S. and foreign cash and cash equivalents; money market funds; liquid, publicly traded stocks, bonds, mutual funds, and exchange-traded funds (ETFs) free of significant purchase and redemption fees and expenses; and certain approved alternative investments.
- All CIAP accounts are subject to the allocation limits and asset class restrictions for the permissible investments listed below.

Asset Class	Asset Class Restrictions
Equity	<ul style="list-style-type: none"> • Emerging markets are limited to 25% of the Giving Account®. • Options are limited to covered call and long put exchange-traded and listed equity options for hedging a long equity position only. Total notional exposure to combined call and put options may not exceed the long equity position.
Fixed Income	<ul style="list-style-type: none"> • Fixed income securities with split credit ratings will use the lower credit rating. • Bank loan and high-yield securities (below investment grade) combined are limited to 50% of the Giving Account. • Convertible and municipal bonds combined are limited to 50% of the Giving Account. • Emerging markets are limited to 25% of the Giving Account.
Hedge Funds & Private Equity Funds	<ul style="list-style-type: none"> • Considered on a case-by-case basis; please contact us at 800-262-6935 for additional information.
Liquid Alternative Investments	<ul style="list-style-type: none"> • Limited to 50% of the Giving Account.
Cash & Equivalents	<ul style="list-style-type: none"> • Money market instruments are limited to institutional prime, institutional municipal, government, or U.S. Treasury. • CIAP advisors must waive fees if a CIAP portfolio holds a greater than 50% allocation of CIAP Assets to cash for an extended period or if a CIAP portfolio comprises only cash and allocations to underlying mutual funds available via the Fidelity Charitable investment pools.
Asset Class	Allocation Limits
Individual Securities	<ul style="list-style-type: none"> • Applies to common stocks, preferred stocks, corporate bonds, ADRs, publicly traded pass-through entities, REITs. • May hold an individual security up to 25% of the Giving Account. • Additional individual securities will be limited to 10% of the Giving Account.
Non-Diversified Mutual Funds	<ul style="list-style-type: none"> • Each non-diversified mutual fund and non-diversified ETF will be limited to 25% of the Giving Account.
Interval Funds	<ul style="list-style-type: none"> • May hold interval funds up to 10% of the Giving Account.
Cryptocurrencies	<ul style="list-style-type: none"> • May hold publicly traded products that track the price of cryptocurrencies up to 10% of the Giving Account. • Cryptocurrency assets, other than what is described above, cannot be held in a CIAP portfolio. Contributions of cryptocurrency assets will be considered by the Complex Asset Group on a case-by-case basis; please contact 800-262-6935 for additional information.

Prohibited Investments and Transactions

The following investments and transactions are generally prohibited for CIAP Assets:

- Contributions of securities with trading restrictions
- Any entity with respect to which the Donor, Account Holder, or any other Disqualified Person on a Giving Account is a director, officer, or principal stockholder as described in Section 16(a)(1) of the Securities Exchange Act of 1934
- Real estate, except as held in a diversified REIT, ETF, or mutual fund position
- Any entity in which the Donor, Account Holder, and any other Disqualified Persons with respect to a Giving Account collectively own more than 35% of the total outstanding interests

The following investments and transactions are generally prohibited for program assets unless within a fund structure:

- Short sales, or any transaction on margin
- Non-negotiable securities
- Investments in companies for the purpose of exercising control or management
- Commodities
- Non-publicly traded structured products
- Futures, warrants, or other leveraged investment strategies that employ derivatives, synthetics, or forward contracts
- Oil, gas, or other mineral exploration or development programs or mineral leases
- Publicly traded, pass-through entities (including master limited partnerships and publicly traded partnerships) that generate unrelated business income tax (UBIT) for tax-exempt investors (generally indicated by the issuance of Form K-1); pass-through entities that provide 1099 reporting are usually acceptable

CIAP Advisors are required to obtain prior approval from Fidelity Charitable prior to investing CIAP Assets in any security in which the CIAP Advisor or a Donor or Account Holder on a Giving Account (or any other Disqualified Person on the Giving Account) maintains a beneficial ownership interest or receives any material financial compensation for recommending.

In addition to the guidelines above, CIAP Advisors are required to obtain approval from Fidelity Charitable before purchasing any investments that may generate UBIT. To the extent any UBIT is generated, Fidelity Charitable will generally assess the liability to the Giving Account invested in the UBIT-generating asset.

A participating CIAP Advisor may not invest CIAP Assets in any one Giving Account participating in the program in any corporation, partnership, trust, or other unincorporated business enterprise if that Giving Account, together with any other Giving Account at Fidelity Charitable as to which the Account Holder, a Family Member of the Account Holder, or a related entity of that Account Holder, would hold, as a result of such investment, in the aggregate (a) more than 2% of the outstanding voting stock of any corporation and not more than 2% in value of all outstanding shares of all classes of stock of that corporation, (b) more than 2% of the outstanding profit interest of a partnership, or (c) more than 2% of the outstanding beneficial interest of a trust or other unincorporated business enterprise. This policy also applies to investments in hedge funds or private equity funds. If a participating CIAP Advisor would like to invest in any one passive alternative investment vehicle such that the individual Giving Account would represent ownership of more than 2% of the vehicle, the CIAP Advisor must first receive Fidelity Charitable's approval; please contact us at 800-262-6935 for additional information.

A participating CIAP Advisor may not engage in transactions with any party that are not expressly in the best interest of Fidelity Charitable, and may not engage in transactions, investments, or activities that are prohibited by applicable law.

Additional Information About Hedge Funds and Private Equity Funds

- A CIAP Advisor recommending a hedge fund or private equity fund must have extensive prior experience in recommending and conducting due diligence on alternative investments. CIAP Advisors are responsible for conducting initial and ongoing due diligence on all alternative investments.
- A complete set of offering and subscription documents, marketing materials, and due diligence documents (including the CIAP Advisor's due diligence report and investment recommendation) must be provided for review.
- A hedge fund or private equity fund may not be transferred to or held in a Giving Account in the CIAP without the prior approval of Fidelity Charitable.
- Please refer to the *Charitable Investment Advisor Program: Alternative Investment Transaction Request* form for additional requirements and to submit a request for review.

If you have any questions about these guidelines or would like to learn more about the Charitable Investment Advisor Program, please contact a Charitable Planning Specialist at **800-682-4438** or visit **[FidelityCharitable.org](https://www.fidelitycharitable.org)**.