

## CHARITABLE INVESTMENT ADVISOR PROGRAM

# Alternative Investment Recommendation Overview & Process

Under the [Charitable Investment Advisor Program Investment Policies and Guidelines](#) (“CIAP Guidelines”), an enrolled investment advisor (“CIAP Advisor”) can recommend that Fidelity Charitable® invest the assets in a Giving Account® in alternative investments. Every alternative investment transaction recommendation must be submitted to Fidelity Charitable® for review and approval, including funds previously approved by Fidelity Charitable. **In addition to the criteria detailed below, Fidelity Charitable reviews each individual recommendation for suitability under standards set by the Trustees of Fidelity Charitable.**

### Requirements for alternative investment funds within a Fidelity Charitable Giving Account®:

#### All alternatives:

- Fund manager must be U.S. domiciled and registered with the U.S. Securities and Exchange Commission (SEC)
- The fund must be audited by a Public Company Accounting Oversight Board (PCAOB) registered auditor
- Minimum commitment size/investment size of \$100,000
- Fees must be reasonable as determined by Fidelity Charitable
- Unrelated Business Taxable Income (UBTI) must be minimal to none
- Fund manager must satisfy Fidelity Charitable background check
- Giving Account must maintain adequate diversification and liquidity, including recommended allocation to proposed fund
- Must satisfy all other CIAP Guidelines requirements

#### Hedge funds:

- Minimum fund size: \$100M

#### Private investments:

- Minimum fund size: \$50M
- Maximum commitment to any fund:
  - 10% of total account value
  - 5% if the fund has a term of 10+ years
- The full capital commitment must be held by Fidelity Charitable in an escrow account

## Process for a new fund (not previously approved within a Fidelity Charitable Giving Account):

**Turnaround time: generally 6 weeks from receipt of all required materials**

The CIAP advisor recommending the fund is required to:

1. Submit [Alternative Investment Transaction Request Form](#) via GivingCentral:
2. Once the above form has been received and reviewed by the Alternative Investment Transaction Team, they will reach out to you via the email address provided on the form for the following:
  - Marketing materials (flip book, executive summary, etc.)
  - [LOU Regarding Alternative Investments Form](#) (signed by donor, only required once per donor)
  - Brief rationale from the CIAP Advisor as to why this fund should be considered within the Giving Account
  - Private Placement Memorandum (PPM) or Offering Memorandum
  - Subscription documents (blank copy)
  - Limited Partnership Agreement (LPA) (if applicable)
  - Recent performance/fact sheet (if available)
  - Due Diligence Questionnaire (DDQ) (if available)
  - Audited financial statements with auditor letter (if fund has > 1 year of history) or an auditor engagement letter if no previous financials are available

## Process for a fund previously approved within a Fidelity Charitable Giving Account:

**Turnaround time: generally 3 business days from receipt of all required materials**

*Note: For funds custodied at Fidelity Investments®, please allow for an additional 5 business days of processing time once completed documents are submitted through Fidelity Wealthscape<sup>SM</sup>.*

The CIAP Advisor recommending the fund is required to:

1. Submit [Alternative Investment Transaction Request Form](#) via GivingCentral:
2. Once the above form has been received and reviewed by the Alternative Investment Transaction Team, they will reach out to you via the email address provided on the form to request a copy of the subscription documents:
  - Subscription documents (blank copy)
  - [LOU Regarding Alternative Investments Form](#) (signed by donor, only required once per donor)
  - Brief rationale from the CIAP Advisor as to why this fund should be considered within the Giving Account.

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Please contact the Alternative Investment Team at [fcalts@fmr.com](mailto:fcalts@fmr.com) to determine if an alternative investment fund was previously approved within a Fidelity Charitable Giving Account.