



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 guidelines for Giving Accounts enrolled in the CIAP:

- CIAP Assets must be appropriately diversified at all times (e.g. across securities, issuers, sectors or countries).
- Approved Investments: U.S. and foreign cash and cash equivalents; money market funds; liquid, publicly traded stocks, bonds, mutual funds, and ETFs free of significant purchase and redemption fees and expenses; and certain approved alternative investments.
- Weightings in each individual security (including common stocks, preferred stocks, corporate bonds, ADRs, publicly traded pass-through entities, REITs) will be limited to not more than **10% of the current market value** of the Giving Account®.
 - Notwithstanding the above, a CIAP portfolio may hold one individual security up to **25% of the current market value** of the Giving Account®.
- Investment advisors must waive fees under the following circumstances:
 - A greater than 50% allocation of CIAP Assets to cash for an extended period of time
 - A CIAP portfolio comprised only of cash and allocations to underlying mutual funds available via the Fidelity Charitable Investment Pools
- Fidelity Charitable reserves the right to determine a Giving Account should be further diversified.
- All Giving Accounts enrolled in the CIAP are subject to the below asset class restrictions.

Asset Class	Asset Class Restrictions
Equity	<ul style="list-style-type: none"> • Emerging and Frontier market combined limited to 25% of Giving Account’s market value • Options are limited to selling covered call and buying long put exchange-traded / listed equity options for hedging a long equity position only
Fixed Income	<ul style="list-style-type: none"> • Fixed Income securities with split credit ratings will use the lower credit rating • Bank loan funds and high-yield (below investment-grade) combined limited to 50% of the Giving Account’s market value • Convertible and municipal combined limited to 50% of the Giving Account’s market value • Emerging and Frontier market combined limited to 25% of the Giving Account’s market value
Hedge Funds & Private Equity Funds	<ul style="list-style-type: none"> • Will be considered on a case by case basis; please contact us at 1-800-262-6039 for additional information
Liquid Alternative Investments	<ul style="list-style-type: none"> • Limited to 50% of the Giving Account’s market value
Cash & Equivalents	<ul style="list-style-type: none"> • Money Market instruments limited to institutional prime, institutional municipal, government or U.S. Treasury

Prohibited Investments and Transactions

The following investments and transactions are generally prohibited for Charitable Investment Advisor Program Assets:

- Contributions of securities with trading restrictions
- Real estate, except as held in a diversified REIT, ETF or mutual fund position

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

Advisors are required to obtain prior approval from Fidelity Charitable prior to investing program assets in any security in which they maintain a beneficial ownership interest or receive any material financial compensation for recommending.

Additional Information about Hedge Funds and Private Equity Funds

- An Investment Advisor recommending a hedge fund or private equity fund must have extensive prior experience in recommending and conducting due diligence on alternative investments. Investment 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 Investment 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 program 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.

In addition to the guidelines above, advisors are required to obtain approval from Fidelity Charitable before purchasing any investments that may generate unrelated business income tax (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 Investment Advisor may not invest program 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 is also an 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 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 Investment Advisor must first receive Fidelity Charitable's approval; please contact us at 1-800-262-6039 for additional information.

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

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](tel:800.682.4438) or visit [FidelityCharitable.org](https://www.FidelityCharitable.org).