



**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:**

- Giving Accounts must be appropriately diversified based on articulated investment strategy at all times (e.g., across securities, issuers, sectors, or countries).
- Approved Investments: U.S. and foreign cash and cash equivalents; money market funds; publicly traded stocks, bonds, mutual funds, and ETFs; and certain approved alternative investments.
- Weightings in each individual security and corporate bond will be limited to not more than 10% of the current market value of the portfolio.
  - Notwithstanding the above, a CIAP portfolio may hold a single publicly traded individual security or corporate bond up to 25% of the current market value of the portfolio.
- Investment advisors must waive fees under the following circumstances:
  - A greater than 50% allocation to cash for an extended period of time
  - A portfolio comprising only cash and allocations to underlying mutual funds available via the Fidelity Charitable Investment Pools.
- CIAP investment advisors must articulate the intended long-term investment strategy and select an appropriate benchmark at the time of account opening. Accounts will be monitored for performance and asset allocation against the selected benchmark on a regular basis..
- Fidelity Charitable reserves the right to determine whether a Giving Account® should be further diversified.
- All CIAP accounts are subject to the asset class restrictions given below.

Asset Class	Asset Class Restrictions
<b>Equity</b>	<ul style="list-style-type: none"> <li>• Emerging and Frontier market combined limited to 25% of portfolio’s market value</li> <li>• Options are limited to selling covered call and buying long put exchange-traded / listed equity options for hedging a long equity position only</li> </ul>
<b>Fixed Income</b>	<ul style="list-style-type: none"> <li>• Fixed Income securities with split credit ratings will use the lower credit rating</li> <li>• Bank loan funds and high-yield funds (below investment grade) combined limited to 50% of the portfolio’s market value</li> <li>• Convertible and municipal combined limited to 50% of the portfolio’s market value</li> <li>• Emerging and Frontier market combined limited to 25% of the portfolio’s market value</li> </ul>
<b>Hedge Funds</b>	<ul style="list-style-type: none"> <li>• Limited to 50% of the portfolio’s market value</li> <li>• Prior approval of Fidelity Charitable required; see below for additional information</li> </ul>
<b>Private Equity Funds</b>	<ul style="list-style-type: none"> <li>• Private equity funds will be considered on a case-by-case basis; please contact us at 800.262.6039 for additional information</li> </ul>
<b>Liquid Alternative Investments</b>	<ul style="list-style-type: none"> <li>• Limited to 50% of the portfolio’s market value</li> </ul>
<b>Cash and Equivalents</b>	<ul style="list-style-type: none"> <li>• Money market instruments limited to institutional prime, institutional municipal, government, or U.S. Treasury</li> </ul>

## Prohibited Investments and Transactions

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

- A participating investment advisor's (or affiliate's) own stock or debt
- 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
- Investments that charge a front-end load, unless the investment advisor deems it as a lower-fee share class, or if the advisor obtains a waiver of any front-end load offered for charitable accounts
- 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
- MLPs that generate Unrelated Business Income Tax (UBIT) for tax-exempt investors (generally indicated by the issuance of Form K-1); MLPs that provide 1099 reporting are usually acceptable
- Investments that charge a fee upon redemption (e.g., "back-end load" or "deferred sales charge")

## Additional Information on Alternative Investments

- An investment advisor recommending a hedge 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 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: Advisor Request for Alternative Investment 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.

A participating investment 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.

**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).**