

Important Notice: 21-314	Year-End Processing Deadlines for Retirement Accounts¹ Important processing guidelines and year-end deadlines for retirement accounts.
Distribution Date: November 2, 2021 Effective Date: Various Category: Operations & Regulatory Questions, contact: Your Client Service Manager Submitter: A042822 RIA	Action Required: Yes Action Steps: <ul style="list-style-type: none"> • Please ensure that processing areas are aware of all year-end deadlines. • Transactions should be submitted through the Integrated Cashiering Platform (ICP) within WealthescapeSM, utilizing electronic signature, if required, to avoid delays.
Description & Key Points	<p>The end of the year is approaching, and Fidelity would like to take this opportunity to alert you to important processing deadlines for retirement accounts. Also included are deadlines for gifting out of non-retirement brokerage accounts.</p> <p>Highlights of this notice include:</p> <ol style="list-style-type: none"> 1. 2021 Retirement Distributions 2. Deadlines for Executing Trades Needed to Satisfy a 2021 Distribution 3. Special Year-End Processing for Periodic Distribution Plan Payments 4. Roth IRA Conversions 5. Tax Reporting 6. Deadline to Establish Fidelity Defined Contribution Retirement Plans and SEP-IRAs 7. Contributions to Roth IRAs and the Five-Year Aging Date 8. Reviewing NIGO Notifications 9. Key Dates to Remember 10. Year-End Best Practices
<p>The information contained herein is provided for informational purposes only and should not be construed as legal or tax advice. Customers should be encouraged to consult a tax advisor or an attorney for information related to their specific situation.</p>	
<p>1. 2021 Retirement Distributions</p> <p>The last day to request a 2021 retirement distribution is December 31, 2021 (December 30, 2021 for distributions via an Electronic Funds Transfer (EFT) payment method). To help ensure that Fidelity is able to process the distribution by year-end, we strongly recommend that a completed distribution form is received in good order by December 14, 2021. Submitting requests earlier allows your firm to address any problems prior to year-end. On a best effort basis, we will continue to process all retirement distribution requests received in good order after December 14, up to December 31, 2021, received no later than 4:00 PM Eastern time.</p> <p>EFT distribution requests, based on next day bank settlement standards, entered to ICP pursuant to an Asset Movement Authorization (AMA) on December 31, 2021, will be reported as a 2022 distribution. Any EFT distribution requests, (not using AMA) received on December 31, 2021 may be modified to a check to the address of record on a best-efforts basis.</p> <p>Note: For all retirement distribution requests that require a customer signature, please ensure the distribution form is signed and dated by the customer no more than 45 days prior to the date of the transaction. Additionally, due to the absence of required disclosure language, any letter of instruction requesting a retirement distribution will be considered not in good order (NIGO).</p> <p>2. Deadline for Executing Trades Needed to Satisfy a 2021 Distribution</p> <p>All trades must settle by December 31, 2021 to be available for distributions on December 31, 2021. Therefore, equity trades must be executed no later</p>	

than December 29, 2021. Please take the settlement periods for different securities into consideration when placing trades. Failure to allow sufficient time for trade settlement may cause distributions requested for 2021 to occur in 2022.

If trades are unable to be completed in time for year-end settlement, distributions 'in kind' from an IRA can be processed to an open Fidelity brokerage account. Additionally, if taxes are to be withheld, cash sufficient to cover the withholding must be available at the time of the distribution.

3. Special Year-End Processing for Periodic Distribution Plan Payments

Pending payments with insufficient funds for plans scheduled to pay prior to December 11, 2021 - If funds in the core account are insufficient to meet the scheduled distribution amount, the distribution will "pend" for three business days. If the full amount scheduled does not become available during the three-business day pending period, Fidelity will pay the amount available at the close of business on the third business day.

Note: The three-day partial distribution process is the standard procedure in effect throughout the year and applies to scheduled periodic distribution plan payments only.

Year-end payments scheduled for plans scheduled to pay between December 11, 2021 and December 31, 2021 - All December periodic distribution plan payments from a customer's core account scheduled to occur from retirement accounts between December 11, 2021 and December 31, 2021, will be "pulled forward" and processed in the December 10, 2021 nightly cycle. This will help ensure that all 2021 retirement distributions are processed in the 2021 tax year.

- Scheduled liquidations to fund these periodic distributions will occur at the market close on December 10, 2021.
- Advisors subscribed to alerts will not receive Projected Failure SWP alerts for the payments included in the pull forward sweep. Advisors are encouraged to use the "Systematic Withdrawal Plan" and "Required Minimum Distribution" reports in WealtheScape to status expected payments after December 11, 2021 through December 31, 2021.

Pending payments with insufficient funds from plans pulled forward

- If funds in the core account are insufficient to meet the scheduled distribution amount, the distribution will "pend" for the greater of three business days or until December 30 for EFT payments or December 31 for other payment methods.
- If the full amount scheduled does not become available during this pending period, Fidelity will pay the amount available at the close of business December 30 for EFT payments or December 31 for other payment methods based on the partial distribution rules summarized below.

Partial pending payment process - The partial distribution process works as follows:

- For pending payment amounts greater than \$50, Fidelity will pay the available amount on December 31, 2021.
- For pending payment requests under \$50, Fidelity will pay a partial payment of any available funds, up to the amount of the distribution request, on December 31, 2021 (December 30, 2021 for EFT payments) OR at the end of the payment pending period (may be 2022), whichever is greater.
- If the pending period extends to January 2022, Fidelity will pay the full amount remaining if it becomes available during the pending period, or any partial amount \$50 or greater available both on December 31 and at the end of the pending period.
- The unpaid portion of the distribution will be deleted upon expiration of the pending period if sufficient funds have not become available to meet the requested amount.

Notes:

- Modifications to December payments during the period between December 11, 2021 and December 31, 2021 are strongly discouraged, as the payments will either have already been initiated or may have been distributed.

System Deadline for New 2021 Periodic Distribution Plans- New 2021 Periodic Distribution Plans should be submitted through ICP within WealtheScapeSM prior to December 28, 2021. Any new plans established after that date will not begin until 2022. Advisors should submit any 2021 distributions as a one-time distribution within ICP and set up the periodic plan to begin in 2022. If a calculation is needed between December 29, 2021 and December 31, 2021, the signed request for a periodic distribution plan should be submitted to the Service Team for manual calculation and processing of the 2021 distribution. Fidelity will process a one-time retirement distribution for 2021 in addition to establishing the periodic distribution plan for 2022. If funding is required for the distribution, you will receive a Service Message NIGO notification alerting you to liquidate positions to meet the distribution amount.

Note: To ensure proper handling, please do not submit distribution requests for 2022 reporting until after December 31, 2021.

4. Roth IRA Conversions

Distributions from a Traditional IRA, Rollover IRA, SEP-IRA and SIMPLE IRA must be made on or before December 31, 2021, and converted to a Roth IRA within 60 days after the day such amount was received in order for the income to be included in gross income for 2021.

Note: SIMPLE IRA assets are not eligible for conversion until after the first 2-years of participation has elapsed for the SIMPLE IRA.

Conversions to a Roth IRA are eligible for entry to ICP. For conversion requests submitted to Fidelity for processing, to help ensure they are processed by December 31, 2021, we strongly recommend that a completed Roth IRA Conversion form is received in good order on or before December 14, 2021. Conversion forms received in good order after December 14 will be processed on a best effort basis up to December 31, 2021.

To ensure Roth IRA Conversion requests are received in good order:

- Ensure there are no unsettled trades applicable to the conversion. The conversion cannot be processed until the day after settlement.
- Ensure all deposits have cleared prior to submitting the request.
- Ensure all open orders applicable to the conversion are cancelled before submitting the request.
- Ensure cash is available to cover tax withholding when applicable.
- For manually requested transactions, if a request is received for a conversion with trades settling in 2022, Fidelity will convert all available securities for 2021 and then NIGO the request for clarification to see if the customer wants the remainder processed as a 2022 conversion.
- Dividends pertaining to a 2021 payment period but posting to an account in 2022 will not be included in a 2021 full Roth IRA conversion. Dividends must be posted to the account in 2021 to be included in the conversion transaction.

5. Tax Reporting

Consistent with Internal Revenue Service (IRS) requirements, tax reporting is performed for the year the distribution is processed. Distributions and Roth IRA conversions cannot be backdated to reflect a previous tax year. Advisors should familiarize their staffs with these time frames to help ensure the timely processing of all distribution requests.

Please be advised that tax forms will be available by January 31, 2022. Tax forms delivered by mail will be mailed to the customer's address of record on file as of December 31, 2021.

Note: Distributions and conversions of residuals will be reported in the year that the residual distributions are processed. Any 2021 contributions to an IRA or Roth IRA after 12/31 will be included on the 5498 mailed in May.

6. Deadline to Establish Fidelity Defined Contribution Retirement Plans and SEP-IRAs

- The IRS deadline to establish new 2022 calendar year Retirement Plans is December 31, 2021. Fidelity will accept plan paperwork until 4:00 PM Eastern time on December 31, 2021. Utilizing an account opening tool with eSignature will expedite the account opening process.
- Clients who wish to establish a new SEP-IRA for 2021 have until their tax filing deadline (including extensions) to establish and fund a SEP-IRA.
- Employer plans have until their tax filing deadline (generally April 15), plus extensions, to fund their plan for the 2021 tax year.

7. Contributions to Roth IRAs and the Five-Year Aging Date

It is the IRA owner's responsibility to track his or her Five-Year Aging Period(s). The Five-Year Aging Period for Roth IRAs begins on January 1st of the tax year for which the contribution is made and ends on the last day of the fifth consecutive year.

Contributions to a Roth IRA made by December 31, 2021 begin the Five-Year Aging Period on January 1, 2021. Contributions to a Roth IRA made between January 1, 2022 and April 15, 2022, as a prior year contribution, also begin the Five-Year Aging Period on January 1, 2021.

For customers who convert to a Roth IRA, the conversion contribution has to be deposited to the Roth IRA by December 31, 2021 to begin the Five-Year Aging Period on January 1, 2021. The other deadlines mentioned above in the Roth IRA Conversions section also apply.

8. Reviewing NIGO notifications

All NIGO requests for money movement and items pending due to insufficient funds can be viewed on Service Center Messages.

- 1) View Service Messages by clicking on the main Service menu > Alert Manager
- 2) Click the Service Center tab
- 3) Click the Service Messages tab

It is very important that you monitor any NIGO alerts to be able to meet year-end deadlines. NIGO transactions that are unable to be resolved until 2022 will not be able to be completed for 2021 reporting.

In order to receive Service Message Alerts, be sure to set your alert subscriptions to the Service Message Alerts online in Alert Manager:

- 1) View Alert Manager by clicking on the main Service menu >Alert Manager
- 2) Click the "Subscription" tab
- 3) Click the "Service Messages" menu item
- 4) Check the appropriate subcategory to receive alert notifications and click "Edit" to modify alert conditions

For detailed instructions and definitions of the Service Message categories, refer to the Service Center Online Help Text found under the Support link > Help >Service > Service Center.

9. Key Dates to Remember

- All retirement periodic distribution plan payments scheduled to be made between December 11, 2021, and December 31, 2021 will be pulled forward and processed in the December 10, 2021 nightly cycle. Projected Failure SWP alerts will not be sent for payments and modifications to December payments during this period are strongly discouraged.
- The last day to request 2021 retirement distributions is December 31, 2021; however, it is strongly recommended that these requests be submitted in good order by December 14, 2021.
- The last day to establish a new periodic distribution plan for a distribution for the 2021 tax year is December 28, 2021. It is recommended that all distribution forms to establish periodic plans be received by Fidelity by December 14, 2021.
- One-time retirement distributions via EFT must be processed by December 30, 2021 in order to post by December 31, 2021. Any EFT request loaded in ICP on December 31, 2021 will be reported as a 2022 distribution.

10. Year-End Best Practices

- When using ICP eSignature for one-time distributions, the eSignature envelope automatically receives a one business day carryover to ensure the envelope does not expire if the end client does not sign by 5 PM EST same day. If a retirement distribution is initiated on December 31, 2021, the eSignature envelope will be available until 5 PM EST January 4, 2022. To ensure retirement distributions are counted as distributions for 2021, please change the expiration date to December 31, 2021. Transactions initiated with ICP eSignature have significantly faster cycle times – as little as 15 minutes end to end. One-time retirement distributions and Roth conversions are eligible for ICP eSignature. In situations where eSignature is not appropriate, please take advantage of the doc attach feature.
- Ensure funds are available for requested transactions; trades must be settled and incoming deposits must be cleared. Incoming deposits are subject to a 4 business day collection period prior to being redistributed.
- Ensure requests using Standing Instructions have instructions on file prior to submitting one-time requests. EFT transactions must clear the prenote period prior to using EFT instructions for distributions. To expedite the process, please take advantage of ICP eSignature. Periodic distribution plans that are established with payment dates during the EFT prenote period will send a check to the address of record.
- Use the applicable form to provide complete transaction instructions. Certain retirement distributions (Disability, Return of Excess, Recharacterization, Defined Contribution Retirement Plan distributions and Direct Rollovers) not governed by Asset Movement Authorization require an authorized client signature on the applicable form to be considered in good order.
- Ensure retirement distributions and Roth IRA conversions have a tax withholding election selected prior to submitting the request. If no election is

selected, the default in effect at the time of the transaction will apply. Ensure that cash is available to cover withholding on in-kind distributions and conversions.

- Ensure all customer signed requests are dated no more than 45 days prior to the date the transaction is submitted for processing.

Gifting from non-retirement brokerage accounts: (Transfer of Assets, deliveries)

Gift		Mutual Fund	Direct Registration System (DRS)	Depository Trust Co (DTC) – Includes ACATS (PTD)
Initiation Deadline		Same day if received by 1:00 p.m. ET	Same day if received by 1:00 p.m. ET	Same day if received by 1:00 p.m. ET
Expected Delivery Timeframe upon initiation		2-7 bus days	3-5 bus days	24 hours
Gifting Deadlines for 2021 Processing	December 3 rd	X		
	December 10 th		X	
	December 10 th			X

Note: If the delivering account is part of a multi-margin relationship or if the asset to be delivered settles internationally, additional time may be required for initiation.

¹ Includes Premiere Select[®] Traditional, Roth, Rollover and SEP IRAs, Inherited IRAs and Inherited Roth IRAs, Fidelity SIMPLE IRAs and Fidelity Defined Contribution Retirement Plan Accounts.

For investment professional use only. Not authorized for distribution to the public as sales material in any form.

Enhancements and deployment dates are subject to change. Screenshots are for illustrative purposes only.

The content provided herein is general in nature and is for informational purposes only. This information is not individualized and is not intended to serve as the primary or sole basis for your decisions as there may be other factors you should consider. You should conduct your own due diligence and analysis based on your specific needs.

Information provided in this document is for informational and educational purposes only. To the extent any investment information in this material is deemed to be a recommendation, it is not meant to be impartial investment advice or advice in a fiduciary capacity and is not intended to be used as a primary basis for you or your client's investment decisions. Fidelity and its representatives may have a conflict of interest in the products or services mentioned in this material because they have a financial interest in them, and receive compensation, directly or indirectly, in connection with the management, distribution, and/or servicing of these products or services, including Fidelity funds, certain third-party funds and products, and certain investment services.

Third party marks are the property of their respective owners; all other marks are the property of FMR LLC. Third parties referenced herein are independent companies and are not affiliated with Fidelity Investments. Listing them does not suggest a recommendation or endorsement by Fidelity Investments.

Fidelity InstitutionalSM (FI) provides clearing, custody, or other brokerage services through National Financial Services LLC or Fidelity Brokerage Services LLC, Members NYSE, SIPC.

245 Summer Street, Boston, MA 02210

©2021 FMR LLC. All rights reserved.

906727.74.0 1.9902416.100