

Important Notice: 5857151	Year-End Processing Deadlines for Retirement Accounts¹ Important processing guidelines and year-end deadlines for calendar year 2025.
Distribution Date: October 28, 2025 Effective Date: October 28, 2025 Category: Operations & Process Questions, contact: Your Client Service Manager Audience: Custody Submitter: a427567	Action Required: Yes Action Steps: <ul style="list-style-type: none"> • Please ensure that processing areas are aware of all year-end deadlines. • To avoid delays, submit transactions through the Integrated Cashiering Platform (ICP) within WealthscapeSM when possible, utilizing electronic signature when client authorization is required.
Description & Key Points	<p>With the end of the year approaching, please note these approaching deadlines to ensure customers' retirement account requests are received and processed in good order (IGO) by Fidelity in a timely manner.</p> <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>Consistent with IRS requirements, distributions (including conversions) are tax reported by Fidelity for the year the distribution is processed. The distribution must occur prior to year-end to be reported as a distribution during that tax year. Distributions cannot be backdated to reflect a previous tax year for any reason.</p> <p>To help ensure timely processing of all distribution requests, advisor firms should familiarize their staff with all timeframes detailed in this Notice. Please review this Notice for information on the following:</p> <ul style="list-style-type: none"> • 2025 Retirement Distributions, Including RMDs • Executing trades needed to satisfy a distribution • Systematic Withdrawal Plan (SWP) payments • Roth IRA Conversions • Distributions Due to Disability • Gifting from Non-Retirement Brokerage Accounts • Deadline to Establish Premiere Select Defined Contribution Retirement Plans and SEP-IRAs • Contributions to Roth IRAs and the 5-Year Aging Date • Viewing Not In Good Order (NIGO) items • Resources <p>Important Note: Do not submit distribution requests for 2026 reporting until after January 1, 2026 to ensure proper handling.</p>
Key Dates for December Distributions	<p>The last day to request a distribution for 2025 is December 31, 2025 (December 30 for distributions via EFT). To ensure a distribution request is processed for 2025, Fidelity strongly recommends that a completed distribution form is received in good order by December 8, 2025. Submitting requests earlier allows your firm to address any requests prior to year-end. On a best-efforts basis, we will continue to process all retirement distribution requests received in good order after December 8, up to December 31, 2025, received no later than 4:00PM Eastern time.</p> <p>Please note the following for EFT distribution requests received by Fidelity on December 31, 2025:</p> <ul style="list-style-type: none"> • Initiated in ICP: <ul style="list-style-type: none"> ○ If eligible for same-day settlement <u>and</u> fully approved by 2:00PM ET, requests will be reportable in tax year 2025. Important: Do not wait until this date to initiate a same-day EFT. Transactions not in good order (NIGO) or approved after 2:00PM ET will be reportable in tax year 2026. ○ Requests initiated with Asset Movement Authorization (AMA) and settle next day will be reportable in tax year 2026. • Paperwork submitted to Service Team: Fidelity will modify the distribution to pay via check to the address of record.

	<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 NIGO.</p>														
Executing trades needed to satisfy a distribution	<p>All trades must settle by December 31, 2025 to be available for distributions on December 31 (the last business day of the year 2025). Therefore, equity trades must execute no later than December 30. When submitting trades, please consider that settlement periods may vary depending on the type of security. Failure to allow sufficient time for trade settlement may cause distributions to occur in 2026.</p> <p>If trades cannot be submitted in time for year-end settlement, distributions “in-kind” from an IRA can be processed to an open non-retirement brokerage account. Additionally, if taxes are to be withheld, the account must have sufficient cash to cover the withholding at the time of distribution.</p>														
Systematic Withdrawal Plan (SWP) Payments	<p>Pending payment process for plans scheduled before December 10, 2025: If funds in the core account are insufficient to meet the scheduled distribution amount, the distribution will “pend” for 3 business days. If the full amount scheduled does not become available during the 3-business day pending period, Fidelity will pay the amount available at the close of business on the 3rd business day.</p> <p><u>Note:</u> The 3 business-day partial distribution process is the standard procedure in effect throughout the year and applies to scheduled SWP payments only.</p> <p>Pending payment process for plans scheduled on or after December 10, 2025: To help ensure that all 2025 retirement distributions are processed in the 2025 tax year, SWPs will be “pulled forward” and initiated on the evening of December 5, 2025. Distributions will pend until funds are available. Below are the key dates for this process:</p> <table> <tr> <th>Date</th><th>Action</th></tr> <tr> <td>December 5, 2025</td><td> <ul style="list-style-type: none"> Last day to modify plans. Payment process begins for all plans scheduled to pay between December 10 and December 31, 2025. Orders entered after market close. </td></tr> <tr> <td>December 8, 2025</td><td>Orders are visible in Wealthscape sent order history and execute at market close.</td></tr> <tr> <td>December 9, 2025</td><td>If sufficient funds are available, EFT, check & journal payments begin processing and will be visible in ICP’s “Future Txns” tab.</td></tr> <tr> <td>December 10, 2025</td><td> <p>All retirement SWP payments will be complete. Projected Failure SWP alerts will <u>not</u> be sent for underfunded payments. Modifications to December payments during this period are strongly discouraged.</p> <p>Advisors are encouraged to use the "Systematic Withdrawal Plan" and "Required Minimum Distribution" reports in Wealthscape to status expected payments after December 10 through December 31.</p> </td></tr> <tr> <td>December 30, 2025</td><td>Partial payments paid if full scheduled amount does not become available. (EFT)</td></tr> <tr> <td>December 31, 2025</td><td>Partial payments paid if full scheduled amount does not become available. (Other payment methods)</td></tr> </table> <p>Pulled-Forward Payments with Insufficient Funds:</p> <ul style="list-style-type: none"> If the core account lacks sufficient funds to meet the scheduled distribution amount, the distribution will “pend” for the greater of 3 business days or until either December 30 (for EFT payments) or December 31 (other payment methods). If the full scheduled amount 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 (other payment methods). Please see below for a summary of the partial distribution process used for pending payments. 	Date	Action	December 5, 2025	<ul style="list-style-type: none"> Last day to modify plans. Payment process begins for all plans scheduled to pay between December 10 and December 31, 2025. Orders entered after market close. 	December 8, 2025	Orders are visible in Wealthscape sent order history and execute at market close.	December 9, 2025	If sufficient funds are available, EFT, check & journal payments begin processing and will be visible in ICP’s “Future Txns” tab.	December 10, 2025	<p>All retirement SWP payments will be complete. Projected Failure SWP alerts will <u>not</u> be sent for underfunded payments. Modifications to December payments during this period are strongly discouraged.</p> <p>Advisors are encouraged to use the "Systematic Withdrawal Plan" and "Required Minimum Distribution" reports in Wealthscape to status expected payments after December 10 through December 31.</p>	December 30, 2025	Partial payments paid if full scheduled amount does not become available. (EFT)	December 31, 2025	Partial payments paid if full scheduled amount does not become available. (Other payment methods)
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	Partial Pending Payment Process:		
	For pending payment amounts...	Fidelity will pay...	On...
	Greater than \$50	The available amount	December 31, 2025 (December 30, 2025 for EFT payments)
	Less than \$50	The available amount	December 31, 2025 (December 30, 2025 for EFT payments) OR: The end of the payment pending period (may be 2026), Whichever is <u>greater</u> .
<ul style="list-style-type: none"> • If the pending period extends to January 2026, Fidelity will pay either: <ul style="list-style-type: none"> ○ 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. • If funds are still not sufficient to meet the requested amount, the unpaid portion of the distribution will be deleted when the pending period expires. <p>Note: Modifications to December payments between December 8 and December 31 are strongly discouraged, as the payments will either have already been initiated or may have been distributed.</p> <p>Systems Deadline for New 2025 SWPs:</p> <p>If created using ICP:</p> <ul style="list-style-type: none"> • December 24, 2025 is the last day to establish new SWPs to pay in 2025. • Beginning December 26, SWPs will be established for 2026 only. • For customers who request a 2025 payment, your firm will need to initiate a one-time distribution in ICP as appropriate, and separately establish the SWP to begin in 2026. <p>If submitted to Fidelity:</p> <ul style="list-style-type: none"> • For customers requesting a 2025 payment between December 26 and December 31, the signed request for a SWP should be submitted to the Service Team for manual calculation and processing of the 2025 distribution. • Fidelity will process a one-time retirement distribution for 2025 in addition to establishing the SWP for 2026. • If funding is required for the distribution, we will issue a NIGO Service Message notifying you to liquidate positions to satisfy the distribution amount. <p>Important to Note:</p> <ul style="list-style-type: none"> • After December 24, 2025, please do not use the "Immediate Payment" feature for the rest of the year. Doing so could create 2026 distributions. • To ensure proper handling, please do not submit distribution requests for 2026 reporting until after December 31, 2025. 			
Roth IRA Conversions	Distributions from a Traditional IRA, Rollover IRA, SEP-IRA and SIMPLE IRA must be made on or before December 31, 2025, 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 2025. If you wish to process a full conversion, and the customer is 73 or older, the RMD must be completed first. 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, we strongly recommend that a completed Roth IRA Conversion form is received in		

	<p>good order on or before December 8. Conversion forms received in good order after December 8 will be processed on a best-efforts basis up to December 31.</p> <p>To ensure Roth IRA Conversion requests are in good order, review the following prior to submitting the request:</p> <ul style="list-style-type: none">• Verify there are no unsettled trades applicable to the conversion. The conversion cannot be processed until the day after settlement.• Similarly, cancel all open orders.• Confirm all deposits have cleared.• Validate the account's available cash will cover tax withholding, when applicable.• If a request is submitted to NFS for processing, but trades settle in 2026, NFS will convert all available securities for 2025. Subsequently, the request will be NIGO'd with instructions to clarify if the customer wants the remainder processed as a 2025 conversion.• Dividends with a Pay Date in 2025, but are not posted to the account until 2026, will not be included in a full Roth IRA conversion that is processed in 2025. Dividends must be posted to the account in 2025 to be included in the conversion transaction.				
Distributions Due to Disability	<ul style="list-style-type: none">• As previously announced in Important Notice 5738003, after December 31, 2025, Fidelity will no longer use Disability as the reason code to report retirement distributions on Form 1099-R.• Existing SWPs coded for Disability will be updated to reflect as age-based distributions beginning with the first payment reportable in tax year 2026. These plans will report as age-based distributions.				
Gifting Shares from Non-Retirement Brokerage Accounts	Gift		Mutual Fund	Direct Registration System (DRS)	Depository Trust Co. (DTC) – Includes ACATS
	Initiation Deadline		Same day if received by 1:00PM ET	Same day if received by 1:00PM ET	Same day if received by 1:00PM ET
	Expected Delivery Timeframe upon initiation		2-7 business days	3-5 business days	24 hours
	Gifting Deadlines for 2025 Processing	December 5	✓		
		December 12		✓	
		December 12			✓
<p>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.</p> <p>Fidelity is not responsible for changes in the value of the assets that may occur during the gifting process.</p>					
Deadline to Establish Defined Contribution Retirement Plans and SEP-IRAs	<ul style="list-style-type: none">• The IRS deadline to establish new 2025 calendar year Retirement Plans is December 31, 2025. Fidelity will accept plan paperwork until 4:00PM Eastern time on December 31. Note: The IRS allows sole proprietors and single-member LLCs to establish their first Individual 401k until their tax filing deadline (including extensions) and therefore can be retroactive to the 2025 calendar year.• Customers who wish to establish a new SEP-IRA for 2025 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 2025 tax year.				
Contributions to Roth IRAs and the 5-Year Aging Date	<ul style="list-style-type: none">• It is the IRA owner's responsibility to track his or her 5-Year Aging Period(s). The 5-Year Aging Period for Roth IRAs begins on January 1st of the tax year for which the contribution is made. It ends on the last day of the 5th consecutive year.• Contributions to a Roth IRA made by December 31, 2025 begin the 5-Year Aging Period on January 1, 2025. Contributions to a Roth IRA made between January 1, 2026 and April 15, 2026 as a prior year contribution also begin the 5-Year Aging Period on January 1, 2025.				

	<ul style="list-style-type: none">For customers who convert to a Roth IRA, the conversion contribution must be deposited to the Roth IRA by December 31, 2025 to begin the 5-Year Aging Period on January 1, 2025. The other deadlines mentioned above in the Roth IRA Conversions section also apply.																						
Reviewing NIGO Notifications	<p>All NIGO requests for money movement and items pending due to insufficient funds can be viewed in Service Center.</p> <ol style="list-style-type: none">1. View Service Messages by clicking Menu > Service > Service Center – Status Items2. Click the Action Items tab, which shows requests requiring immediate attention, or All Items to review all requests. <p>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 2026 cannot be completed for 2025 reporting.</p> <p>To receive Service Message Alerts, be sure to set your alert subscriptions for Service Messages in Alert Manager:</p> <ol style="list-style-type: none">1. Click Menu > Reports & Alerts > Alert Manager.2. Click the “Subscriptions” button on the lower left corner.3. Click “Manage All Alerts” and choose “Service Messages.”4. Choose the subcategory on which you wish to receive alerts and check the boxes to set subscription options for each alert. <p>For detailed instructions and definitions of the Service Message categories, refer to the Wealthscape Help and click Service > Service Center – Status Items > Service Message Descriptions.</p>																						
Key Dates to Remember	<table><tr><th>Date</th><th>Action/Reminder</th></tr><tr><td>December 5, 2025</td><td><ul style="list-style-type: none">• Last day to modify Systematic Withdrawal Plans (SWPs).• Payment process begins for all plans scheduled to pay between December 10 and December 31, 2025.• Orders entered after market close.</td></tr><tr><td>December 8, 2025</td><td>Orders are visible in Wealthscape’s sent order history and execute at market close.</td></tr><tr><td>December 8, 2025</td><td>Recommended date by which all one-time and SWP forms should be submitted in good order to Fidelity.</td></tr><tr><td>December 9, 2025</td><td>If sufficient funds are available, EFT, check & journal payments begin processing and will be visible in ICP’s “Future Txns” tab.</td></tr><tr><td>December 10, 2025</td><td>All retirement SWP payments scheduled to be made between December 10 and December 31, 2025 will be complete. Projected Failure SWP alerts will <u>not</u> be sent for underfunded payments. Modifications to December payments during this period are strongly discouraged.</td></tr><tr><td>December 24, 2025</td><td>Last day to establish a new SWP for a distribution reportable in the 2025 tax year. Also the last day to establish a new SWP with the Immediate Payment option selected.</td></tr><tr><td>December 30, 2025</td><td>Last day to process a one-time retirement distribution via EFT to be reportable for the 2025 tax year.</td></tr><tr><td>December 31, 2025</td><td>Last day to process a one-time retirement distribution via check, wire, or journal to be reportable for the 2025 tax year.</td></tr><tr><td>December 31, 2025</td><td>One-time EFT contributions entered on this date will be reported in the 2025 tax year, regardless of time of entry.</td></tr><tr><td>2025 and 2026, as applicable</td><td>Distributions of residuals will be reported in the year that the residual distributions are processed.</td></tr></table>	Date	Action/Reminder	December 5, 2025	<ul style="list-style-type: none">• Last day to modify Systematic Withdrawal Plans (SWPs).• Payment process begins for all plans scheduled to pay between December 10 and December 31, 2025.• Orders entered after market close.	December 8, 2025	Orders are visible in Wealthscape’s sent order history and execute at market close.	December 8, 2025	Recommended date by which all one-time and SWP forms should be submitted in good order to Fidelity.	December 9, 2025	If sufficient funds are available, EFT, check & journal payments begin processing and will be visible in ICP’s “Future Txns” tab.	December 10, 2025	All retirement SWP payments scheduled to be made between December 10 and December 31, 2025 will be complete. Projected Failure SWP alerts will <u>not</u> be sent for underfunded payments. Modifications to December payments during this period are strongly discouraged.	December 24, 2025	Last day to establish a new SWP for a distribution reportable in the 2025 tax year. Also the last day to establish a new SWP with the Immediate Payment option selected.	December 30, 2025	Last day to process a one-time retirement distribution via EFT to be reportable for the 2025 tax year.	December 31, 2025	Last day to process a one-time retirement distribution via check, wire, or journal to be reportable for the 2025 tax year.	December 31, 2025	One-time EFT contributions entered on this date will be reported in the 2025 tax year, regardless of time of entry.	2025 and 2026, as applicable	Distributions of residuals will be reported in the year that the residual distributions are processed.
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Year-End Best	<ul style="list-style-type: none">• Use ICP eSignature for faster processing: When using ICP eSignature for one-time distributions, the eSignature envelope automatically receives a 1 business day carryover to ensure the envelope does not expire if the end customer																						

Practices	<p>does not sign by 5:00PM ET that same day. If a retirement distribution is initiated on December 31, 2025, the eSignature envelope will be available until 5:00PM ET January 2, 2026. To ensure retirement distributions are reported in 2025, please change the Expiration Date to December 31, 2025. Transactions initiated with ICP eSignature are completed significantly faster – as little as 15 minutes end-to-end. One-time retirement distributions and Roth conversions are eligible for ICP eSignature.</p> <ul style="list-style-type: none"> • Attach paperwork in ICP: In situations where eSignature is not possible or appropriate, please take advantage of the Doc Attach feature within ICP. • Verify funds are available: 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 EFT instructions are on file: When submitting one-time requests using standing instructions, verify that the standing instructions are on file first. EFT transactions must clear the prenote period before they can be used for distributions. To expedite the process, please take advantage of ICP eSignature. SWPs that are established with payment dates during the EFT prenote period will send a check to the address of record. • Use applicable form and verify if customer needs to sign: Use the applicable form to provide complete transaction instructions. Certain retirement distributions (Disability until December 31, 2025; Return of Excess, Recharacterization, Defined Contribution Retirement Plan distributions and Direct Rollovers) are not eligible for Asset Movement Authorization and require an authorized customer signature on the applicable form to be considered in good order. Letters of Instruction are not acceptable. • Select tax withholding on form: Confirm that retirement distributions and Roth IRA conversions have a tax withholding election selected prior to submitting the request. If no election is chosen, the default in effect at the time of the transaction will apply. Review account balances to confirm that cash is available to cover withholding on in-kind distributions and conversions. • Verify request is dated recently: Check that all customer-signed requests are dated no more than 45 days prior to the date the transaction is submitted for processing.
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¹ Includes Premiere Select® Traditional, Roth, Rollover and SEP IRAs, IRA and Roth IRA Beneficiary Distribution Accounts and Fidelity SIMPLE IRAs, Defined Contribution Retirement Plan accounts and Retirement Plan Beneficiary Distribution Accounts.

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