

**Fiduciary Adviser Disclosure**  
**Investment Advice Services for Fidelity Workplace Savings Plan Accounts, Individual Retirement Accounts, and Health Savings Accounts**

**Fidelity's Investment Advice Services**

Fidelity Brokerage Services LLC ("Fidelity") may provide you with investment assistance both online and through its representatives for your employer-sponsored workplace retirement plan account ("workplace plan"), Health Savings Accounts ("HSAs"), and Individual Retirement Accounts ("IRAs"). Online investment advice may be provided to you through the Investment Strategy Tool for workplace plans and IRAs and through the HSA Investment Tool for HSAs (collectively, "Advice Tools"). These tools may be accessed through the Planning & Guidance Center on Netbenefits.com and Fidelity.com. Note that Fidelity representatives may also use these tools to recommend model portfolios, managed accounts, target date funds, and target allocation funds for these accounts over the phone or in person.

**Fiduciary Status and Compliance**

When we provide investment advice to you regarding your workplace plan, IRA, or HSA within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, we are a fiduciary within the meaning of these laws governing retirement accounts. Fidelity has elected to be treated as the only fiduciary and fiduciary adviser with respect to the Advice Tools and the computer model in the tool.

With respect to online advice provided through the Advice Tools as provided herein Fidelity intends to comply with the computer model exemption for investment advice under Section 408(b)(14) and 408(g) of ERISA and Labor Department regulation Section 2550.408g-1 and applicable provisions under the Internal Revenue Code. The advice arrangement will be audited annually by an independent auditor for compliance with applicable requirements. The auditor will furnish a copy of its findings within 60 days of its completion of the audit to the authorizing fiduciary of your workplace plan. A copy of the auditor's findings will be made available for your workplace HSA account on [NetBenefits®](#), for [your IRA](#), and for [your HSA](#) within 30 days following receipt of the report from the auditor.

**Non-fiduciary Investment Education and Assistance**

Certain investment assistance we provide may not be subject to the investment advice rules under ERISA and the Internal Revenue Code. When we provide this type of assistance, we provide it for educational purposes and it should not be relied on as a primary basis for your investment decisions. This type of assistance includes:

- Self-directed, or unsolicited, transactions or trades;
- General descriptions, information and education about our products and services or with respect to plan distribution or rollover decisions;
- Communications that are not an individualized/personalized suggestion for you to take a particular course of action with respect to your retirement assets;
- Assistance for workplace plans that are not subject to Title I of ERISA;
- Recommendations with respect to accounts other than accounts that you maintain with Fidelity; or

- Any communications that are not fiduciary investment advice (as defined by ERISA or the Code).

### **Conflicts of Interest and Compensation**

Fidelity and its affiliates (“the Fidelity Companies”) and parties with whom Fidelity has a material financial relationship provide a range of services to your workplace plan, IRA, or HSA for which they may receive compensation. These services include investment management, transfer agent, brokerage, custodial, recordkeeping, and shareholder services for some or all the investment funds available under the plan or within the IRA or HSA. Because we offer a variety of products and services to you, conflicts of interest arise. The products and services we offer have different costs to you and different levels of compensation earned by us, our affiliates, and our representatives.

Fidelity does not charge a separate fee for the investment advice it provides. However, Fidelity Companies generally receive compensation based on the investments you select. When Fidelity recommends an investment fund or managed account of one of the Fidelity Companies and you follow that recommendation, a Fidelity Company will receive compensation from the fund or managed account based on the amount you invest. The amount received will vary depending on the particular fund or managed account. Information on the fees, and any other charges of each Fidelity fund or managed account, is available for you to review through [NetBenefits.com](https://www.netbenefits.com) or [Fidelity.com](https://www.fidelity.com).

Fidelity Companies may also receive compensation from nonaffiliated funds when you choose these funds as a result of Fidelity’s recommendations. The amount of this compensation varies depending on the particular fund but typically ranges from zero to one-half of one percent per year (0% to 0.5%) based on the average daily balance invested in the fund.

In some instances, Fidelity Companies do not receive compensation based on the investments you select. For example, certain nonaffiliated investments may not compensate Fidelity Companies. In addition, the Fidelity Companies may provide a credit to a workplace plan, equal to all or a portion of the compensation received from plan investments reducing the amount of compensation received by the Fidelity Companies.

FBS and its representatives will only recommend no-transaction-fee funds, and do not make recommendations regarding transaction fee or load funds or consider them when making recommendations to you. Please see the document “**Fidelity Brokerage Services LLC Products, Services, and Conflicts of Interest**” for more information about how Fidelity makes recommendations and conflicts of interest.

Nonaffiliated funds recommended for your HSA are selected from a limited universe of third-party fund companies. For HSAs, the only third-party fund companies whose funds were eligible for inclusion in this limited universe are companies that participate in a marketing, engagement, and analytics program with Fidelity for which they pay a flat annual fee. Please see the HSA Investment Review Methodology document to learn about the process Fidelity used when selecting among the universe of funds.

You should carefully consider the impact of any fees and compensation when evaluating investment advice that Fidelity, or any financial adviser, provides to you and before you make any investment decision.

You may choose to work with an investment adviser other than Fidelity that could have no material affiliation with and receive no fees or other compensation in connection with the investments offered in your plan, IRA or HSA; however, other fees may apply.

Please see the Planning & Guidance Center Investment Strategy Methodology or the HSA Investment Review Methodology document to learn about your planning session.

#### Investment Returns

Information on past performance and historical rates of return of all investment options available within your plan, IRA or HSA may be found through [NetBenefits.com](http://NetBenefits.com) and [Fidelity.com](http://Fidelity.com).

#### Protection of Personal Information

Fidelity is committed to maintaining the confidentiality, integrity, and security of your personal information. Please refer to the Fidelity Investments Privacy Policy found through [NetBenefits.com](http://NetBenefits.com) or [Fidelity.com](http://Fidelity.com) for information about how your personal information will be collected, used or shared, and protected.

This document does not relate to any account other than a workplace savings plan, Fidelity IRA or HSA as defined above.

For questions or more information on details provided in this notice related to your workplace plan call 800-420-2363 and for your IRA call 800-343-3548 or HSA please call 866-402-7621.