

FIDELITY INSTITUTIONAL BROKERAGE SERVICES¹

CUSTOMER ASSET PROTECTION OVERVIEW

General Information

Fidelity Investments

Fidelity Investments is one of the world's largest providers of financial services, with custodied assets of \$3.4 trillion, including managed assets of \$1.6 trillion as of December 31, 2007. Fidelity offers investment management, retirement planning, brokerage, and human resources and benefits outsourcing services to more than 24 million individuals and institutions as well as through 5,500 financial intermediary firms. The firm is the largest mutual fund company in the United States, the No. 1 provider of workplace retirement savings plans, the largest mutual fund supermarket and a leading online brokerage firm. For more information about Fidelity Investments, visit www.fidelity.com.

Institutional Brokerage

Clearing, custody, or other brokerage services are provided by National Financial Services LLC (NFS) or Fidelity Brokerage Services LLC (FBS). NFS and FBS are registered broker/dealers and are wholly-owned by Fidelity Global Brokerage Group, Inc., a wholly-owned subsidiary of FMR, LLC ("FMR").

National Financial

NFS provides a wide range of services to over 330 clients ranging from retail broker/dealers to institutional investment firms. NFS provides brokerage, clearance, custody and financing services. NFS also trades on a proprietary basis for itself and the firms for which it clears. Collectively, NFS' clients have more than 86,000 brokers. NFS custodies \$728 billion in assets representing more than 5.5 million customer accounts.

Institutional Wealth Services

Fidelity Institutional Wealth Services (IWS), formerly known as Fidelity Registered Investment Advisor Group (FRIAG), is a leading provider of trading, custody and brokerage services to Registered Investment Advisors, Trust Institutions and Third Party Administrators. IWS offers its clients a comprehensive set of products and services, innovative investment tools and research, an integrated brokerage and trust platform, and dedicated client service professionals. IWS custodies over \$352 billion in assets on behalf of more than 3,900 clients.

Fidelity Capital Markets

Fidelity Capital Markets Services (FCMS) executes equity and fixed income trades, provides execution services in listed options and trades foreign exchange on behalf of a wide array of clients, including millions of individual investors, 1,000 institutional firms, nearly 340 correspondent broker/dealers, 3,900 registered investment advisors, bank trust and TPA clients and nearly 18 million client accounts.

¹ This document relates to Fidelity Institutional Wealth Services, Fidelity Capital Markets Services, Fidelity Stock Plan Services, and National Financial Services

Fidelity Stock Plan Services

Fidelity Stock Plan Services (SPS) is a leading provider of solutions for equity compensation plans, total benefits and personal finance. Stock Plan Services provides global outsourcing solutions for Stock Option, Restricted Stock, Stock Appreciation and Employee Stock Purchase plans for over 175 clients, representing over one million participants, located in more than 100 countries.

Our System of Internal Controls

We have several internal organizations, led by experienced industry professionals, whose primary mission is protecting Fidelity's businesses and client assets. These include:

Risk Oversight:

- Reviews, develops and implements processes and procedures to help protect Fidelity and its clients.

Fidelity Corporate Audit:

- Reviews and helps ensure the effectiveness and efficiency of our internal controls.

Corporate Security:

- Provides site security, pre-employment screening and due diligence research for prospective business alliances.

Enterprise Compliance:

- Helps ensure that Fidelity's businesses are in compliance with industry regulatory requirements.

Our Credit Ratings

While Fidelity is privately-held, we have periodically issued debt as an additional source of funding for our operations. Since 1999, we have consistently earned Investment Grade credit ratings for both Long Term Debt and Financial Strength from Standard & Poor's[®] ("S&P") and Moody's Investors Service.

Industry Rules and Regulations That Protect Our Customers

Like other brokerage firms, NFS is subject to the rules and regulations of the U.S. Securities and Exchange Commission (SEC) and the Financial Industry Regulatory Authority (FINRA). Among the rules that help protect our customers are:

- SEC Rule 15c3-1 (net capital for broker/dealers) — In accordance with this rule, NFS' excess net capital must meet a mandated minimum to protect client assets; currently NFS' net capital exceeds this minimum requirement.
- SEC Rule 15c3-3 (customer protection, segregation of fully-paid-for and excess margin securities and cash) — In accordance with this rule, NFS protects client securities that are fully paid for² by segregating them and ensuring that they are not used for any other purpose, such as for loans to investors or institutions. This practice helps ensure that customers have access to these securities at all times. This rule also protects customers by requiring that a broker/dealer maintain a special reserve bank account, separate from all bank accounts of the broker/dealer, for the exclusive benefit of customers. Should a broker/dealer determine that deposits in the special reserve bank account are

² SEC rules for margin accounts limit securities loans by broker-dealers to a maximum of 140% of a customer's outstanding margin loans.

insufficient per the SEC rules the broker/dealer is required to increase deposits to the necessary level or immediately notify the SEC of the deficiency.

- SEC Rule 17a-11 (requires the broker/dealer to make certain notices when its financial condition or other specific circumstances raise concern) — In accordance with this rule, NFS would be required to promptly notify the SEC (within 24 hours) should net capital fall below 120% of its required level.
- SEC Rule 17a-5 (periodic reports on financial / operational condition and auditors reports on financial condition and internal control) — In accordance with this rule, NFS files reports with the SEC on a monthly basis, detailing its current financial condition.
- SEC Rules 17a-3 and 4 (books and records creation and maintenance) — In accordance with this rule, NFS' broad set of policies ensure that its books and records are properly created, maintained and audited.

Compliance with these and other rules by all securities firms is regularly reviewed and strictly enforced by the regulatory agencies. At Fidelity, compliance with these rules is also audited by internal and independent auditors.

Strong Net Capital Position

Like other registered broker/dealers, NFS is required to regularly file reports with the SEC about its net capital position. SEC rules require NFS and other broker/dealers to maintain minimum net capital equal to 2% of aggregate debit items associated with customer transactions.³ As part of its commitment to protecting customers, NFS maintains a significantly higher net capital level than is required.⁴ For more information, please refer to the attached NFS Consolidated Statement of Financial Condition as of December 31, 2006.

SIPC Insurance Protection

NFS is a member of the Securities Investor Protection Corporation (“SIPC”), which was created in 1970 by Congress to help protect customers⁵ of member broker/dealer firms. SIPC is a non-profit membership corporation funded by broker/dealers, which are required by law to be members. SIPC is not an agency or establishment of the United States Government. Under the Securities Protection Act of 1970 (“SIPA”) customers of a member of SIPC are afforded special protections. For details, please see www.sipc.org. SIPC coverage does not apply to certain investments and does not protect against a decline in the market value of securities⁶.

Excess SIPC Asset Protection

As a supplement to SIPC, NFS has purchased additional account coverage to provide further asset protection for its customers. This supplemental coverage is not subject to a dollar limitation for any one account or for the firm and is a level of supplementary protection that other insurers may not provide.⁷ The current provider of this coverage is Customer Asset Protection Company (“CAPCO”), a licensed Vermont insurance company

³ A full description of the Uniform Net Capital Rule 15c3-1 may be found at www.sec.gov.

⁴ Please refer to the NFS Statement of Financial Condition for the Net Capital calculation as of December 31, 2006.

⁵ Customer and Customers refers to the defined term under SIPA.

⁶ Among the assets typically not eligible for SIPC protection are commodity futures contracts, currency, and precious metals, as well as investment contracts (such as limited partnerships) and fixed annuity contracts that are not registered with the U.S. Securities and Exchange Commission under the Securities Act of 1933.

⁷ This additional protection does not protect against declines in the market value of securities.

that has received an A+ credit and financial strength rating from S&P[®]. CAPCO provides NFS and other large broker/dealers with incremental asset protection for their customer accounts.

CAPCO offers:

- Total net equity protection, as compared to insurance policies that impose either a policy or a per customer limit
- Strength and security due to its capitalization group (the other large firms participating in CAPCO)
- Management by Marsh Inc., the largest insurance broker in the world
- Backing by well-known, strong reinsurers
- A commitment to maintaining an A+ credit rating

NOTE: Total net equity protection covers the same asset classes which are protected under SIPC.⁸ See the attached Standard & Poor's Research report on CAPCO for more information.

Additional Asset Protection Information

As a general matter, customers are not considered general creditors of a failed broker-dealer; customers receive distributions ahead of general creditors. General creditors of a failed broker-dealer do not receive any distribution unless all customers have been satisfied in full.

Protecting Client Assets is Our Priority

At Fidelity, protecting client assets is a top priority of our business. This document provides you with an understanding of some of the processes, procedures and other safeguards we employ to maximize client asset protection.

Our comprehensive system of internal controls, processes and procedures help ensure compliance with the rules and regulations of the external regulatory agencies that oversee our business. Our risk management, compliance and internal audit functions are an extremely important part of these controls. In addition, we participate in both government-sponsored and privately-managed asset protection programs, which help us further enhance the security of client assets. This combination of internal controls, risk management and audit and asset protection programs provides comprehensive and effective asset protection for all of our clients.

⁸ A full description of SIPC and its coverage may be found at www.sipc.org