## Fidelity U.S. Momentum Currency Neutral Index ETF (the "Fund")



Fidelity Investments Canada ULC, the manager of the Fund

## **PFIC Annual Information Statements**

For the year ended April 30, 2021

## IMPORTANT TAX NOTICE TO U.S. PERSONS WHO ARE UNITHOLDERS OF THE FUND

This statement is provided to unitholders who are United States persons for purposes of the U.S. Internal Revenue Code of 1986, as amended ("IRC") and the regulations thereunder. United States persons include U.S. citizens (whether or not they are U.S. residents), certain individuals with U.S. permanent resident status, U.S. corporations and certain U.S. trusts and estates. Unitholders of the Fund should consult with a U.S. tax professional to determine whether they are United States persons.

The Fund may be considered a Passive Foreign Investment Company ("PFIC") as defined in Section 1297(a) of the IRC. Therefore, United States persons who hold units of the Fund may be subject to the U.S. tax rules applicable to investments in PFICs.

If you are a unitholder who is a United States person, consider consulting a tax advisor concerning the overall tax consequences of your ownership of units of the Fund and your U.S. tax reporting requirements, including the merits of the various available tax elections, such as the Qualified Electing Fund ("QEF") election. Further information on PFIC rules and the QEF election is available from the Internal Revenue Service ("IRS"), including the following website: www.irs.gov/instructions/i8621/ch01.html.

A unitholder who is a United States person and who makes a QEF election is required to annually include in his or her income his or her pro-rata share of the ordinary earnings and net capital gains of the Fund, whether or not that fund distributed any amounts to its shareholders. While the choice of whether the QEF election is appropriate for you will depend on your personal circumstances, please note that the QEF election is the only way that appreciation in the value of the Fund can be eligible for U.S. taxation at the more favourable capital gains rates.

Generally, a QEF election is made using IRS Form 8621 (Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund) and is filed for each fund for which you wish to make a QEF election. Where a unitholder who is a United States person is a unitholder in a Fidelity Fund that holds other Fidelity Funds in its portfolio, that person is an indirect holder in the underlying funds and is required to file a separate election form for each of the underlying funds. The attached Funds Annual Information Statements ("AIS") contain reporting for both the top-level fund and the underlying funds, so that U.S. persons could make the QEF election, if they chose to.

The PFIC AIS has been prepared in compliance with the requirements under Treasury Regulation §1.1295-1(g)(1). The PFIC AIS contains information to enable unitholders who are United States persons to elect to treat the Fund as a QEF. Investors should consult with their U.S. tax specialist to discuss the appropriateness of a QEF tax election and in completing the necessary tax forms for their U.S tax returns.

Thank you for investing with Fidelity Investments. Questions about your investment plan should be referred to your advisor. If you have any further questions about these statements, please contact Fidelity Client Relations at 1 800 263-4077, between 8:00 a.m. and 8:00 p.m., EST, Monday to Friday.



## **PFIC Annual Information Statements (US\$)**

For the Fund's PFIC taxation year ended April 30, 2021

- 1. This Information Statement applies to the PFIC taxation year of Fidelity U.S. Momentum Currency Neutral Index ETF (the "Fund") commencing on June 05, 2020 and ending on April 30, 2021.
- 2. The per-unit, per-day amounts of ordinary earnings and net capital gains of the Fund and it's lower-tier Fund(s) as applicable, for the period specified in paragraph (1) are provided in the table:

FIDELITY FUND HELD DIRECTLY			ORDINARY EARNINGS \$	NET CAPITAL GAIN \$
Fidelity U.S. Momentum Currency Neutral Index ETF			0.00445191	0.00000000
FIDELITY LOWER-TIER FUNDS HELD INDIRECTLY	ORDINARY EARNINGS \$	NET CAPITAL GAIN \$	FUND'S U.S. TAX YEAR COMMENCING	FUND'S U.S. TAX YEAR ENDING
Fidelity U.S. Momentum Index ETF	0.00762490	0.00000000	June 05, 2020	April 30, 2021

To determine your pro-rata share of the amounts of ordinary earnings and net capital gains of the Fund and each of its lower-tier fund(s) held directly and indirectly, as applicable, multiply the per-unit per-day amounts indicated above by the number of units of the Fund held and the number of days you held the units during the Fund's PFIC taxation year.

Here is an example to illustrate the calculation using the per-unit, per-day factors.

You own 100 units of Fund A from the period May 1, 2020 through October 31, 2020. You purchased an additional 100 units of Fund A on November 1, 2020. You did not sell any units of the Fund at any time during the year. Fund A has a PFIC taxation year end of April 30, 2021.

The Fund's ordinary earnings were \$0.001 per unit, per day.

Result: Your ordinary earnings for 2021 of the directly held fund are (\$0.001 \* 183 days \* 100) + (\$0.001 \*180 days\* 200) = \$54.30

Use the same calculation method in the example above, to determine your pro-rata share of the amounts of ordinary earnings and capital gains for any applicable lower-tier Fund(s).

3. The per-unit amounts of cash and fair market value of other properties distributed or deemed distributed by the Fund during the period specified in paragraph(1) are provided in the below chart.

PAYMENT DATE	CASH/PROPERTY DISTRIBUTIONS (\$)		
December 31, 2020	0.06754489		
TOTAL	0.06754489		



4. The Fund listed above, and the lower-tier funds, as applicable, will, upon receipt of request, permit you to inspect and copy the permanent books of account, records and other such documents as may be maintained by them to establish that their respective ordinary earnings and net capital gain are computed in accordance with U.S. income tax principles, and to verify these amounts and your prorata share thereof. The per-unit amount of cash and fair market value of other properties distributed or deemed distributed by the Fund to unitholders during the period specified in paragraph (1) are provided in the chart above.

Sincerely,

**Amanda Thomas** 

Vice President and Fund Treasurer