

## TAX HARVESTING POLICY – EQUITY STRATEGIES

Throughout the year, Loomis, Sayles & Company (Loomis) will receive tax harvesting request forms from its various sponsors and clients. Loomis' policy regarding tax harvesting is to use the sponsor's internal form to transact all tax harvesting requests. Once Loomis receives the tax harvesting request, they will review the document to ensure that the account is managed by Loomis and that instructions are clear and precise. It is the Financial Advisor's responsibility to make sure that all Tax Harvesting requests contain accurate account and client specific information prior to sending to Loomis.

The tax harvesting deadline for Loomis equity strategies is the **first Friday of December of the current**. Any requests received after the first Friday of December will be completed on a "best efforts" basis and may not be completed prior to January 1, of the following year. In general, tax harvesting requests with accurate information are processed within seven business days once they are received.

- Loomis will seek to comply with the instructions upon receipt of this notice on a "best efforts" basis (meaning that the instructions may be complied only if, when, and to the extent that it is reasonably possible to accommodate them). Page two outlines how we would process a "Tax Efficient" withdrawal.
- Events such as market changes during the period before instructions are complied with and decisions by the investment manager, in its sole discretion, may increase or reduce the amounts of losses or gains that are realized from the portfolio at any time.
- This activity may adversely affect the portfolio's performance and may increase the volatility of its results.
- Please make sure to consult with your tax advisor prior to making any tax harvesting requests.

If Loomis is directed to realize losses:

- Loomis will resume normal trading activity, which could generate new taxable losses/gains.
- Withdrawals from the account could cause the manager to rebalance the portfolio, which will generate new taxable gains/losses.
- Securities sold for a loss will be restricted from being purchased for a minimum of thirty-one calendar days, consistent with IRS Wash Sale rules (IRS Publication 550 Investment Income and Expenses).
- The client's ability to realize a loss in the current year may be impacted if a purchase of a similar security has been made within thirty days of the sell.
- After the Wash Sale period, the proceeds may be used to purchase the same securities originally sold or different securities, depending on Loomis' investment philosophy and the client's most recently provided investment objective and restrictions.
- Loomis will hold the proceeds from the Wash Sale in the model's ETF replacement security.

If Loomis is directed to realize gains:

- The same securities may be repurchased immediately and at an increased cost.

*If the client wishes to withdraw sale proceeds from their account, the Financial Advisor MUST inform the investment manager via a separate withdrawal form immediately. If the proceeds are not placed back into the account once the Wash Sale period expires, Loomis will automatically rebalance the client's portfolio. This rebalance may cause more realized gains and losses.*

**Submit all tax harvesting requests to Loomis via email to [RAP@loomissayles.com](mailto:RAP@loomissayles.com).**

**Tax Efficient Withdrawal:**

If a client asks to realize a specific amount of losses and the client's primary reason for the tax harvesting request is for withdrawal purposes (Tax Efficient Withdrawal), Loomis will not be able to process the request at the same time. Instead, Loomis will ask the Financial Advisor to send in a withdrawal request for the actual amount of money the client needs and an additional tax harvesting request. The withdrawal request will need to be sent in prior to the tax harvesting request.

Loomis will then raise the money needed for the withdrawal and then process the tax harvesting request as two separate transactions. Loomis processes the transactions this way because the client's portfolios are managed to a model. In order to keep the client's portfolio in line with the model, it is better for the client if Loomis first prorates sells across each of the client's holdings, keeping the portfolio in line with the model, minimizing major sells to each position, and raising the needed cash.

Once the withdrawal has been raised, Loomis will then be able to realize any tax harvesting the client wishes, taking into consideration any gains that may have been realized from the withdrawal.