

CROMWELL FUNDS INHERITED IRA DISTRIBUTION REQUEST FORM

This form is for use by a beneficiary with an existing Cromwell Funds Inherited IRA to request a distribution.

DO NOT USE THIS FORM IF YOU ARE THE BENEFICIARY OF AN IRA FOR A DECEASED OWNER AND ARE ATTEMPTING TO MAKE AN INITIAL CLAIM.

Not for use for a non-reportable transfers to another custodian. Please complete and submit the appropriate receiving custodian's trustee-to-trustee transfer of assets form.

Please Print

1. DECEASED ORIGINAL IRA OWNER and INHERITED IRA OWNER (BENEFICIARY) INFORMATION

Original IRA Owner / Decedent:

Name: _____

Last 4 digits of Social Security Number: _____

Date of Birth: _____

Date of Death: _____

Beneficiary Name / Owner of the Inherited IRA:

Name: _____

Daytime Telephone: () _____

Last 4 digits of the Tax ID (Social Security Number or EIN on the Inherited IRA account)

Check this box if the beneficiary/owner of the inherited IRA is a Designated Beneficiary who did not meet the requirements of the separate account rule and therefore must base Life Expectancy Calculations on the date of birth of the oldest beneficiary on the original owner's account on 12/31 of the year following the year of the original owner's death. Date of Birth for Life Expectancy Calculations: _____

Authorized individual(s) name(s): Trustee, Executor, Authorized Representative or Responsible Individual if beneficiary is a minor:

Name: _____

Daytime Telephone: () _____

Name: _____

Daytime Telephone: () _____

Type of Beneficiary (choose one):

- Spouse – person married to the IRA owner as of their date of death
- Non-spouse individual beneficiary of the original owner (if you are the beneficiary of an account already registered as an Inherited IRA choose Successor Beneficiary below)
- Minor child (under 21) of the original IRA owner
- An entity such as an estate, charity, or trust (other than a qualified "look-through" trust)
- A "qualified look-through trust"; By choosing this election I affirm I have consulted a qualified tax and/or legal professional and this trust is eligible for life expectancy distributions based on the following date of birth: _____
Month Day Year
- Successor beneficiary (the original owner's beneficiary named you as the beneficiary of their Inherited IRA)
- Successor beneficiary second-generation or more (you were named as a beneficiary of an Inherited IRA owned by a Successor Beneficiary of the original owner's beneficiary). Please provide information for each decedent other than the deceased original owner.

Name of Original Owner Beneficiary who subsequently died

Date of Birth

Date of Death

Name of Successor Beneficiary who subsequently died

Date of Birth

Date of Death

Check this box and attach a separate letter if additional prior deceased Successor Beneficiary names need to be provided.

2. INHERITED IRA ACCOUNT INFORMATION

I have an existing Inherited IRA – Enter your Account Number: _____

or

I am establishing an Inherited IRA with assets from another custodian, a Cromwell Funds Inherited IRA Application is attached

Important: If this account is being funded with assets from another custodian and Life Expectancy calculations for a distribution for the current year are being requested provide the value of those Inherited Assets as of 12/31 of last year \$ _____

3. ELECTION FOR ONE-TIME DISTRIBUTION CHOOSE ONE

Important: Any amount distributed from an inherited IRA account cannot be redeposited back into this or any other IRA. All distributions from inherited IRAs are reported as death distribution on IRS Form 1099-R under Code 4 in Box 7.

- One-Time Partial Distribution - Dollar Amount \$ _____ (or) Shares _____ (skip to Section 5 - Distribution allocation)
- Liquidate Entire Account (skip to Section 6 Payment Method Instructions)

4. ELECTION FOR SYSTEMATIC WITHDRAWAL

Important: Any amount distributed from an inherited IRA account cannot be redeposited back into this or any other IRA. All distributions from inherited IRAs are reported as death distribution on IRS Form 1099-R under Code 4 in Box 7.

Please review the Additional Information sections attached to this form for information about distribution requirements and available options that may be elected. Options vary depending on the beneficiary, the date the IRA owner died and other factors. Due to passage of the SECURE Act of 2019 distribution rules for Designated IRA beneficiaries are different if the owner died in or prior to 2019 or in or after 2020. We strongly suggest you consult a tax professional prior to completing this form.

4a. SYSTEMATIC DISTRIBUTIONS OPTIONS –

SELECT ANY SINGLE OPTION: EITHER A PERIODIC OPTION OR A LIFE EXPECTANCY OPTION BUT NOT BOTH.
PERIODIC DISTRIBUTION OPTIONS

- Periodic Distribution of a Specific Dollar Amount** \$ _____. If you choose this option rather than one of the options offered below, you may not meet the RMD requirements for your account. You are responsible for ensuring that RMD requirements are met.
- Periodic Distribution - Five-Year Rule** – Available only when the date of death of the original owner is prior to the owner's Required Beginning Date (RBD) for RMDs* and only for the following beneficiaries: A Designated Beneficiary of the original owner who died prior to 1/1/2020, a trust (other than a qualified look through trust), charity, estate or other beneficiary that is an entity and not an individual.

The amount of each payment will vary. The custodian will calculate the amount of each payment by dividing the balance of each fund on the business day prior to each distribution by the remaining number of payments. The number of payments will be based on the start date and frequency you select in section 4b and an end date no later than 12/31 of the 5th year after the year of death of the original owner as provided in section 1. Please note that you are responsible for ensuring that the full balance is redeemed by 12/31 of the 5th year.

*The original owner of a Roth IRA is not subject to RMDs during their lifetime at any age, for this reason regardless of the date of death it is always treated as prior to their Required Beginning Date for RMD.

- Periodic Distribution - Ten-Year Rule** – This option may be used by any of the following:
1. A Designated Beneficiary that is not an Eligible Designated Beneficiary
 2. An Eligible Designated Beneficiary of a deceased original owner whose date of death is in or after 2020 AND prior to the deceased owner's Required Beginning Date for RMD.
 3. A Successor Beneficiary of an Eligible Designated Beneficiary who died on or after 1/1/2020 and was either required to take annual Life Expectancy Distributions or was not required but elected to take annual Life Expectancy Distributions starting no later than 12/31 of the year following the year of death of the original owner.

The amount of each payment will vary. The custodian will calculate the amount of each payment by dividing the balance of each fund on the business day prior to each distribution by the remaining number of payments. The number of payments will be based on the start date and frequency you select in section 4b and an end no later than 12/31 of the 10th year after the year of death of the Original Owner provided in section 1 of this form or for a Successor Beneficiary the year of death of the Original Owner's Eligible Designated beneficiary provided in section 1. Please note that you are responsible for ensuring annual Life Expectancy Distributions (if applicable) are satisfied. See Life Expectancy Distributions in the Additional Information attached to this form. You are solely responsible for ensuring you meet all distribution deadlines.

- Periodic Distribution – Full distribution by age 31** – You may use this option if the owner died on or after 1/1/2020 and you are deceased owner's child and you had not reached age 21 on the date of death of the original owner. You will cease to be an Eligible Designated Beneficiary when you reach age 21 and generally all remaining assets must be distributed no later than December 31 of the year you reach age 31.

The amount of each payment will vary. The custodian will calculate the amount of each payment by dividing the balance of each fund on the business day prior to each distribution by the remaining number of payments. The number of payments will be based on the start date and frequency you select in section 4b and an end on 12/31 of the year you reach age 31.

Please note that the beneficiary is responsible for ensuring annual Life Expectancy Distributions (if applicable) are satisfied. See Life Expectancy Distributions in the Additional Information attached to this form. You are solely responsible for ensuring you meet all distribution deadlines.

4a. SYSTEMATIC DISTRIBUTIONS OPTIONS - CONTINUED

LIFE EXPECTANCY DISTRIBUTION OPTIONS (DO NOT SELECT A LIFE EXPECTANCY OPTION IF YOU HAVE SELECTED A PERIODIC OPTION ABOVE)

- Spouse or a Trust that is a "qualified look-through trust", as defined in IRS Publication 590-B Distributions from Individual Retirement Arrangements (IRAs) with the spouse as sole beneficiary of the trust. Use spouse beneficiary's single life expectancy recalculated each year.
Spouse or a Trust that is a "qualified look-through trust", as defined in IRS Publication 590-B Distributions from Individual Retirement Arrangements (IRAs) with the spouse as a beneficiary of the trust. Election to use spouse beneficiary's single life expectancy calculated in the year following the year of death reduced by one each year thereafter.
A Non-Spouse Eligible Designated Beneficiary. Life expectancy calculated in the year following the original owner's year of death, reduced by one for each year after.

Note: If the owner died on or after their Required Beginning Date for RMD and had a longer life expectancy based on their age at the time of their death, the owner's life expectancy will be used.

- A Designated Beneficiary other than an Eligible Designated Beneficiary where the original owner's date of death is on or after 1/1/2020 and on or after their Required Beginning Date for RMD*. Life expectancy calculated in the year following the original owner's year of death, reduced by one for each year after.

* IRS guidance issued in 2023 requires beneficiaries subject to the 10-year rule also are required to take Life Expectancy Distributions at least annually beginning no later than 12/31 of the year after the year of the original owner's death where the owner died on after their RBD. The Life Expectancy payments, however, may not continue for a period greater than 10 years, as the requirement for a Full Distribution of any remaining assets held in the inherited IRA no later than 12/31 of the 10th year after the year the original owner died still applies. See also the 10-year rule under Additional Information - Lexicon for details if you inherited IRA assets due to an owner's death in 2020-2022.

Note: Distributions under this method may not fully distribute all assets by the 12/31 of the 10th year following the year of the original owner's death. You are solely responsible for ensuring all assets are distributed in a timely manner.

- "Qualified look-through trust" as defined in IRS Publication 590-B Distributions from Individual Retirement Arrangements (IRAs) and you affirm you have consulted a qualified tax and/or legal professional and this trust is eligible for Life Expectancy Distributions based on (1) the date of birth of the oldest person who is a beneficiary of the Trust and the owner died in or prior to 2019 or (2) the date of birth of an Eligible Designated Beneficiary (other than the deceased owner's spouse) who is the sole beneficiary of the trust and the original owner died on or after 1/1/2020.

Calculate Life Expectancy Distributions based on this date of birth: ___/___/___
Month Day Year

Note: If the owner died on or after their Required Beginning Date for RMD and had a longer life expectancy based on their age at the time of their death, the owner's life expectancy will be used.

- Charity, estate, or a trust other than a "qualified look-through trust", or other entity beneficiary. The owner's date of death was on or after their Required Beginning Date for RMDs, base Life Expectancy calculations on the owner's age in the year of their death.

4b. - SYSTEMATIC DISTRIBUTION CYCLE

Begin systematic distributions on1: ___/___/___
Month Day Year

Frequency (choose one)2: [] Monthly [] Quarterly [] Semi-Annually [] Annually

1 If this form is received after the date selected it will be processed upon receipt. Future payments will be established with the date listed.

2 If a frequency is not selected, your payments will be distributed annually on the 20th of the next available month.

5. DISTRIBUTION ALLOCATION

Choose one:

- [] Distribute proportionately across all fund positions

OR

- [] Distribute as indicated below*:

Fund: _____ Percentage: _____%
Fund: _____ Percentage: _____%
Fund: _____ Percentage: _____%

*IMPORTANT NOTE: If you choose this option and any fund position noted above is subsequently liquidated, or closed, you are responsible for contacting the custodian to reallocate your fund percentages. Failure to do so could result in delays in the distribution of your assets. The custodian assumes no responsibility for monitoring or adjusting your allocation election in future years. The total for all funds listed must equal 100%. If you require additional space to list funds, please attach a separate sheet with all funds and the percent to take from each fund.

6. PAYMENT METHOD INSTRUCTIONS

Based on your selected payment method, a Medallion Signature Guarantee Stamp may be required. Please refer to your prospectus or call us at the number listed on this form for specific requirements. If no payment method is selected, a check payable to the inherited IRA owner, trust, estate, or entity will be mailed to the address of record. If you have elected a systematic withdrawal, your payout method will remain in effect until we receive notice from you requesting a change. All checks may only be made payable to the registered inherited IRA owner, trust, estate, or entity.

Mail check payable to registered inherited IRA owner, trust, estate, or entity to the address of record currently on file.

Mail check payable to registered inherited IRA owner, trust, estate, or entity to an alternate address.

Medallion Signature Guarantee is required when an alternate address is not already on record.

Attention: _____

Street: _____

City: _____

State: _____

Zip: _____

*Transfer funds electronically via ACH (voided check or savings deposit slip required)

Medallion Signature Guarantee is required when bank information is not already on record.

BANK NAME: _____

BANK ROUTING NUMBER: _____ BANK ACCOUNT NUMBER: _____

BANK ACCOUNT REGISTRATION*: _____

*THE BANK ACCOUNT REGISTRATION MUST INCLUDE THE NON-SPOUSE, TRUST, ESTATE OR ENTITY BENEFICIARY

BANK ACCOUNT ADDRESS¹: _____

CITY

STATE

ZIP

¹The address the bank has on record for the owner of the bank account.

7a. FEDERAL TAX WITHHOLDING ELECTION (applies to all Inherited IRAs including Roth Inherited IRAs)

Federal income tax will be withheld at the rate of 10% from any distribution, subject to the IRS withholding rules, unless you elect a withholding rate of 0% below or have previously elected out of withholding. Tax will be withheld on the gross amount of the payment even though you may be receiving amounts that are not subject to withholding because they are excluded from gross income. This withholding procedure may result in excess withholding on the payments. If you elect to have no federal taxes withheld from your distribution, or if you do not have enough federal income tax withheld from your distribution, you may be responsible for payment of estimated tax. You may incur penalties under the estimated tax rules if your withholding and estimated tax payments are not sufficient. You understand that your below election will remain in effect until such time as you make a different election with the Custodian.

I elect federal income tax withholding of 0%, do not withhold federal income tax from my distributions.*

I elect federal income tax withholding of _____% must be a whole percent, you may elect any rate from 1% to 100%.*

See the attached Form W-4R Withholding Certificate for Nonperiodic Payments which has the **Marginal Rate Tables** and "**Suggestion for determining withholding**" instructions. You may use these tables and instructions to help you select the appropriate withholding rate.

*Generally, you can't elect less than 10% federal income tax withholding for payments to be delivered outside the United States and its possessions.

7b. STATE TAX WITHHOLDING ELECTION (applies to all Inherited IRAs including Roth Inherited IRAs)

Your state of residence will determine your state income tax withholding requirements, if any. Those states with mandatory withholding may require state income tax to be withheld from payments if federal income taxes are withheld or may mandate a fixed amount regardless of your federal tax election. Voluntary states let individuals determine whether they want state taxes withheld. Some states have no income tax on retirement payments. Please consult with a tax advisor or your state's tax authority for additional information on your state requirements. If you are completing this form, your below election will remain in effect until such time as you make a different election in writing to the Custodian.

I elect **NOT TO** have state income tax withheld from my retirement account distributions (only for residents of states that do not require mandatory state tax withholding).

I elect **TO** have the following dollar amount or percentage withheld from my retirement account distribution for state income taxes (for residents of states that allow voluntary state tax withholding). \$ _____ or _____ %

8. AUTHORIZATION

I certify that I am the individual authorized to make these elections and that all information provided is true and accurate. I further certify that the Custodian, the sponsor, or any agent of either of them has given no tax or legal advice to me, and that all decisions regarding the elections made on this form are my own. The Custodian is hereby authorized and directed to distribute funds from the account in the manner requested. The Custodian may conclusively rely on this certification and authorization without further investigation or inquiry. I expressly assume responsibility for any adverse consequences which may arise from the election(s) and agree that the Custodian, sponsor, and their agents shall in no way be responsible, and shall be indemnified and held harmless, for any tax, legal or other consequences of the election(s) made on this form.

Substitute W-9 - Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number, and

2. I am not subject to backup withholding because:

a. I am exempt from backup withholding; or

b. I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends; or

- c. The IRS has notified me that I am no longer subject to backup withholding; and
- 3. I am a U.S. citizen or other U.S. person (as defined in the Form W-9 instructions found at www.irs.gov).
- 4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

Cross out item 2 above if the IRS has notified you that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return.

The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.

X

Authorized Signature (Beneficiary, Trustee, Executor, Responsible Individual, or Personal/Legal Representative) Date:

Please review the Cromwell Funds prospectus for Medallion Signature Guarantee stamp requirements.

Medallion Signature Guarantee Stamp and Signature: An eligible guarantor is a domestic bank or trust company, securities broker/dealer, clearing agency or savings association that participates in a medallion program recognized by the Securities Transfer Agents Association. The three recognized medallion programs are the Securities Transfer Agents Medallion Program (known as STAMP), Stock Exchanges Medallion Program (SEMP), and the Medallion Signature Program (MSP). A notarization from a notary public is NOT an acceptable substitute for a signature guarantee.

Medallion Signature Guarantee Stamp

Mail to the following:

First Class Mail:

Cromwell Funds
P.O. Box 534498
Pittsburgh, PA 15253-4498

Overnight Mail:

Cromwell Funds
Attention: 534498
500 Ross Street, 154-0520
Pittsburgh, PA 15262

Customer Service:

1-855-625-7333

Substitute W-4R 2026 - Withholding Certificate for Nonperiodic Payments – For use with IRAs ONLY

Where instructed to provide your withholding election on “line 2” use the space provided on the attached form under “Federal Income Withholding Election.”

2026 Marginal Rate Tables

You may use these tables to help you select the appropriate withholding rate for this payment or distribution. Add your income from all sources and use the column that matches your filing status to find the corresponding rate of withholding. See below for more information on how to use this table.

Single or Married filing Separately		Married filing jointly or Qualifying surviving spouse		Head of household	
Total income over—	Tax rate for every dollar more	Total income over—	Tax rate for every dollar more	Total income over—	Tax rate for every dollar more
\$0	0%	\$0	0%	\$0	0%
16,100	10%	32,200	10%	24,150	10%
28,500	12%	57,000	12%	41,850	12%
66,500	22%	133,000	22%	91,600	22%
121,800	24%	243,600	24%	129,850	24%
217,875	32%	435,750	32%	225,900	32%
272,325	35%	544,650	35%	280,350	35%
656,700*	37%	800,900	37%	664,750	37%

*If married filing separately, use \$400,450 instead for this 37% rate.

General Instructions: Section references are to the Internal Revenue Code.

Future developments. For the latest information about any future developments related to Form W-4R, such as legislation enacted after it was published, go to www.irs.gov/FormW4R.

Purpose of form. Complete Form W-4R to have payers withhold the correct amount of federal income tax from your nonperiodic payment from an employer retirement plan, annuity (including a commercial annuity), or individual retirement arrangement (IRA). See below for the rules and options that are available for each type of payment.

Caution: If you have too little tax withheld, you will generally owe tax when you file your tax return and may owe a penalty unless you make timely payments of estimated tax. If too much tax is withheld, you will generally be due a refund when you file your tax return. Your withholding choice (or an election not to have withholding on a nonperiodic payment) will generally apply to any future payment from the same plan or IRA. Submit a new Form W-4R if you want to change your election.

Nonperiodic payments—10% withholding. Your payer must withhold at a default 10% rate from the taxable amount of nonperiodic payments **unless** you enter a different rate on line 2. Distributions from an IRA that are payable on demand are treated as nonperiodic payments. Note that the default rate of withholding may not be appropriate for your tax situation. You may choose to have no federal income tax withheld by entering “-0-” on line 2. See the specific instructions below for more information. Generally, you are not permitted to elect to have federal income tax withheld at a rate of less than 10% (including “-0-”) on any payments to be delivered outside the United States and its territories .

Note: If you don’t give Form W-4R to your payer, you don’t provide an SSN, or the IRS notifies the payer that you gave an incorrect SSN, then the payer must withhold 10% of the payment for federal income tax and can’t honor requests to have a lower (or no) amount withheld. Generally, for payments that began before 2026, your current withholding election (or your default rate) remains in effect unless you submit a Form W-4R.

Payments to nonresident aliens and foreign estates. Do not use Form W-4R. See Pub. 515, Withholding of Tax on Nonresident Aliens and Foreign Entities, and Pub. 519, U.S. Tax Guide for Aliens, for more information.

Tax relief for victims of terrorist attacks. If your disability payments for injuries incurred as a direct result of a terrorist attack are not taxable, enter “-0-” on line 2. See Pub. 3920, Tax Relief for Victims of Terrorist Attacks, for more details.

Specific Instructions

Line 2 - More withholding. If you want more than the default rate withheld from your payment, you may enter a higher rate on line 2.

Less withholding (nonperiodic payments only). If permitted, you may enter a lower rate on line 2 (including “-0-”) if you want less than the 10% default rate withheld from your payment. If you have already paid, or plan to pay, your tax on this payment through other withholding or estimated tax payments, you may want to enter “-0-”.

Suggestion for determining withholding. Consider using the Marginal Rate Tables above to help you select the appropriate withholding rate for this payment or distribution. The tables are most accurate if the appropriate amount of tax on all other sources of income, deductions, and credits has been paid through other withholding or estimated tax payments. If the appropriate amount of tax on those sources of income has not been paid through other withholding or estimated tax payments, you can pay that tax through withholding on this payment by entering a rate that is greater than the rate in the Marginal Rate Tables.

The marginal tax rate is the rate of tax on each additional dollar of income you receive above a particular amount of income. You can use the table for your filing status as a guide to find a rate of withholding for amounts above the total income level in the table.

To determine the appropriate rate of withholding from the table, do the following. Step 1: Find the rate that corresponds with your total income not including the payment. Step 2: Add your total income and the taxable amount of the payment and find the corresponding rate.

If these two rates are the same, enter that rate on line 2. (See Example 1 below.)

If the two rates differ, multiply (a) the amount in the lower rate bracket by the rate for that bracket, and (b) the amount in the higher rate bracket by the rate for that bracket. Add these two numbers; this is the expected tax for this payment. To get the rate to have withheld, divide this amount by the taxable amount of the payment. Round up to the next whole number and enter that rate on line 2. (See Example 2 below.)

If you prefer a simpler approach (but one that may lead to overwithholding), find the rate that corresponds to your total income including the payment and enter that rate on line 2.

Examples. Assume the following facts for *Examples 1* and *2*. Your filing status is single. You expect the taxable amount of your payment to be \$20,000. Appropriate amounts have been withheld for all other sources of income and any deductions or credits.

Example 1. You expect your total income to be \$70,000 without the payment. Step 1: Because your total income without the payment, \$70,000, is greater than \$66,500 but less than \$121,800, the corresponding rate is 22%. Step 2: Because your total income with the payment, \$90,000, is greater than \$66,500 but less than \$121,800, the corresponding rate is 22%. Because these two rates are the same, enter “22” on line 2.

Example 2. You expect your total income to be \$60,000 without the payment. Step 1: Because your total income without the payment, \$60,000, is greater than \$28,500 but less than \$66,500, the corresponding rate is 12%. Step 2: Because your total income with the payment, \$80,000, is greater than \$66,500 but less than \$121,800, the corresponding rate is 22%. The two rates differ. \$6,500 of the \$20,000 payment is in the lower bracket (\$66,500 less your total income of \$60,000 without the payment), and \$13,500 is in the higher bracket (\$20,000 less the \$6,500 that is in the lower bracket). Multiply \$6,500 by 12% to get \$780. Multiply \$13,500 by 22% to get \$2,970. The sum of these two amounts is \$3,750. This is the estimated tax on your payment. This amount corresponds to 19% of the \$20,000 payment (\$3,750 divided by \$20,000). Enter “19” on line 2.

CROMWELL FUNDS INHERITED IRA DISTRIBUTION REQUEST FORM ADDITIONAL INFORMATION

Neither Cromwell Funds nor BNY Mellon IS Trust as custodian guarantees or affirms the appropriateness of the elections made on this form. We do not represent that you will meet your required minimum distribution (RMD) requirements; you should consult a qualified tax professional prior to completing this form as it is the responsibility of the beneficiary to ensure withdrawals taken meet the Internal Revenue Code and guidance provided by the IRS.

The information below is subject to change and is intended for informational purposes only. It is not intended as, and cannot be relied upon as, tax advice that you may cite to the IRS or any other party to refute any finding by any party that you have taken or failed to take any action that is required. Please review IRS Publication 590-B *Distributions from Individual Retirement Arrangements (IRAs)* and speak with a qualified tax professional if you have question about your options as a beneficiary.

Key factors that impact the requirements for beneficiary distributions after the death of the owner.

1. What type of IRA did the deceased owner have?*

- a. Traditional IRA (including Rollover IRA, SEP, and SIMPLE IRAs)
- b. Roth IRA

*If the decedent was a participant in an employer sponsored qualified retirement plan or non-qualified retirement plan different rules may apply. The beneficiary may have the option to have assets from an employer sponsored plan moved to an Inherited IRA. Please speak with a qualified tax professional about what, if any, impact that may have on your options for distributions from the Inherited IRA.

2. What is the original owner's date of death?

- a. Did the original owner's death occur on or after January 1, 2020? If yes, and you are a Designated Beneficiary, the SECURE Act of 2019 may impact when you are required to take a distribution. More information is included later.
- b. Did the owner die prior their **Required Beginning Date (RBD)**? The RBD is the due date for the first RMD that the owner of an IRA is due*, which is April 1st of the year after the year the owner reaches RMD Age. Over time RMD age has been increased to account for the fact that on average American's life expectancy has increased. Changes in RMD age depend on when the owner was born. Look at the left-hand column of the table below, find the row that includes the decedent's date of birth; the middle column is their RMD age, and the right-hand column is the due date of the first RMD, their RBD.

Required Beginning Date Table		
Owner's Date of Birth is:	RMD age	Required Beginning Date (RBD)
On or prior to June 30, 1949	70 ½	April 1 following the year the owner reached age 70 ½. Owners born January 1 to June 30; it is April 1 of the year the owner reaches age 71. Owners born July 1 to December 31; it is April 1 of the year the owner reaches age 72.
July 1, 1949, to December 31, 1950	72	April 1 of year the owner reaches age 73.
January 1, 1951, to December 31, 1959	73	April 1 of year the owner reaches age 74.
On or after January 1, 1960	75	April 1 of year the owner reaches age 76.
<p>*Roth owners are not subject to RMD during their lifetime, the requirements for distributions for a beneficiary of Roth assets are based on the rules for an owner's death prior to RBD.</p>		

When a beneficiary is required to take distributions depends on whether the owner died prior to the RBD or on/after RBD. Important: whether the owner received or scheduled one or more distributions with the intent to satisfy their first RMD prior to death does not change the requirements for the beneficiary.

Example: An IRA owner born June 10, 1945, reached RMD age in 2016, their RBD is April 1, 2017. The owner requested the custodian calculate and distribute their RMD for 2016 on January 5, 2016. If the owner died on any date in 2016 after January 5, 2016, or in 2017 prior to April 1, death occurred prior to their RBD. That a distribution intended to satisfy the 2016 RMD was received prior to death doesn't change when their beneficiary is required to take distributions, the owner died prior to RBD and those rules apply.

3. Is the beneficiary a Designated Beneficiary or a Non-Designated Beneficiary?

- a. **Designated Beneficiary:** a person named as beneficiary to inherit the balance of a retirement account after the death of the owner.
 - i. If the Original owner died prior to January 1, 2020, any Designated Beneficiary could distribute assets they inherited over their Life Expectancy. However, where the owner died on or after January 1, 2020, the SECURE Act of 2019 restricts the option to take Life Expectancy Distributions only to certain Designated Beneficiaries who are an Eligible Designated Beneficiary (EDB) which includes the following individuals:
 1. The owner's spouse.

2. A child of the IRA owner under the age of 21 is an EDB only until they attain age 21, any portion remaining must be distributed no later than December 31 of the year they reach age 31.
 3. Disabled individuals within the meaning of section 72(m)(7) of the Internal Revenue Code as of the date of the death of the owner.
 4. Chronically ill individuals, within the meaning of section 401(a)(9)(E)(ii)(IV) as of the date of death of the owner.
 5. An individual not listed above who is not more than 10 years younger than the IRA owner.
- ii. A spouse designated as beneficiary may become the owner of the IRA and may transfer or rollover the assets from the deceased owner's IRA directly into their own IRA. However, a spouse may also elect to open an Inherited IRA and follow the rules for a designated beneficiary for distributions, with some exceptions. The election to be treated as a beneficiary instead of becoming the owner can be changed, the spouse may transfer, or rollover assets from the Inherited IRA to their own IRA in the future and be treated as the owner from that point. Always speak with a tax professional about what option is best for you, and what, if anything you need to do if you elect to open an Inherited IRA and wish to move the assets into your own IRA in the future.
- b. **Non-Designated Beneficiary:** any legal entity that is not a living person named as beneficiary to inherit the balance of a retirement account after the death of the owner. Examples include, but are not limited to an estate, a charity, foundation, or Trust*.
- i. *Certain Trusts are "qualified look-through trusts" under IRS guidelines and therefor may be treated as a Designated Beneficiary (and, if applicable, an EDB) for the purpose of RMD rules only. The rules for trusts are complex and you should confirm with a legal professional whether a specific trust qualifies as an "qualified look-through trust". See "Additional Information Other factors that may impact beneficiary RMD requirements" at the end of this document.
- c. **Successor Beneficiary:** A Designated Beneficiary of the original deceased owner who establishes an Inherited IRA is allowed by the custodian to name one or more beneficiaries, these may be Designated or Non-Designated beneficiaries. Specific requirements for distributions apply see Successor Beneficiary Distribution Requirements.

Beneficiary Distribution Options and Requirements

Based on the answers to the questions above, locate the table and section that applies to you as beneficiary. Terms underlined below are defined in the Additional information – Lexicon at the end of this document. Life Expectancy Distributions may be elected or required, see Additional information – Life Expectancy Distributions for information on the steps to determine the amount of those distributions.

Beneficiary of the Original Owner

If the original owner died prior to January 1, 2020, go to **Beneficiary Distribution Requirements Original Owner Death PRIOR to the SECURE Act**

If the owner died on or after January 1, 2020, go to **Beneficiary Distribution Requirements Original Owner Death AFTER the SECURE Act**

Successor Beneficiary

If the owner of an Inherited IRA (i.e., the initially named beneficiary) died, go to **Successor Beneficiary Distribution Requirements**

Beneficiary Distribution Requirements Original Owner Death <u>PRIOR</u> to SECURE ACT		
Beneficiary is a:	Owner's Date of Death prior to RBD (Roth IRA, regardless of age on the date of death)	Owner's Date of Death on/after RBD (N/A for deceased Roth IRA owner)
Designated Beneficiary (other than spouse)	1. Elect to take Life Expectancy Distributions 2. <u>5-year rule</u>	Life Expectancy Distributions are required each year after the year of the owner's death by December 31.
Spouse Designated Beneficiary	1. Elect to take Life Expectancy Distributions - RMDs for inherited accounts are generally required under IRS regulations to begin by 12/31 of the year after the year of death of the original account owner. Exception to this beginning date applies to spouses of the original owner, who may delay beginning to take RMDs until the year in which the original owner would have reached their first RMD year. 2. <u>5-year rule</u>	Life Expectancy Distributions are required each year after the year of the owner's death by December 31.
Non-Designated Beneficiary	<u>5-year rule</u>	Life Expectancy Distributions are required each year after the year of the owner's death by December 31.

Beneficiary Distribution Requirements Original Owner Death AFTER SECURE Act

Beneficiary is a:	Owner's Date of Death prior to RBD (Roth IRA, regardless of age on the date of death)	Owner's Date of Death on/after RBD (N/A for deceased Roth IRA owner)
Designated Beneficiary	<u>10-year rule</u>	<u>10-year rule</u> AND Life Expectancy Distributions required by December 31 each year, starting with the year after the year the original owner died.
Eligible Designated Beneficiary (other than spouse)	1. Elect to take Life Expectancy Distributions 2. <u>10-year rule</u>	Life Expectancy Distributions required by December 31 each year, starting with the year after the year the original owner died.
Eligible Designated Beneficiary (Spouse)	1. Elect to take Life Expectancy Distributions - RMDs for inherited accounts are generally required under IRS regulations to begin by 12/31 of the year after the year of death of the original account owner. Exception to this beginning date applies to spouses of the original owner, who may delay beginning to take RMDs until the year in which the original owner would have reached their first RMD year. 2. <u>10-year rule</u>	Life Expectancy Distributions required by December 31 each year, starting with the year after the year the original owner died.
Non-Designated Beneficiary	<u>5-year rule</u>	Life Expectancy Distributions required by December 31 each year, starting with the year after the year the original owner died.

Successor Beneficiary Distribution Requirements

Original Designated Beneficiary Death <u>PRIOR</u> to January 1, 2020*		Original Designated Beneficiary Death <u>on or after</u> January 1, 2020*	
Either was required to or elected in a timely manner to receive Life Expectancy distributions from the Inherited IRA after the owner's death.	Life Expectancy distributions were not required or were not elected in a timely manner from the Inherited IRA after the owner's death.	Either was required to or elected in a timely manner to receive Life Expectancy distributions from the Inherited IRA after the owner's death.	Was not required to take Life Expectancy Distributions from the Inherited IRA after the owner's death and <u>either did not elect to take them</u> , or if the original owner died after 1/1/2020, they were not an Eligible Designated Beneficiary and could not elect to take them.
The Successor Beneficiary is required to:		The Successor Beneficiary is required to:	
Continue Life Expectancy Distributions based on the remaining Life Expectancy of the Original Designated Beneficiary	Complete distribution of all Assets by December 31 of the 5 th year following the year of Original Owner's death. No annual distributions are required	Continue annual Life Expectancy Distributions based on the remaining Life Expectancy of the Original Designated Beneficiary starting by 12/31 of the year following the year of death of the Original Designated Beneficiary. In addition, they must distribute any assets that remain in the account by December 31 of the 10 th year following the date of death of the Original Designated Beneficiary	Complete distribution of all Assets by December 31 of the 10 th year following the year of Original Owner's death. No annual distributions are required

* Where the Beneficiary of the Original Deceased owner's is the owner's spouse who elected to establish an Inherited IRA and all the following are true then an exception to the rules outlined above may apply.

- a. The Surviving Spouse Beneficiary was either;
 - i. The sole primary beneficiary of the Original Deceased owner's IRA or
 - ii. One of multiple beneficiaries of the Original Deceased Owner's IRA as of the date of the owner's death who completed a transfer of the assets to which they were entitled to an Inherited IRA no later than December 31 of the year after the year of the owner's death.
- b. The Original Owner's date of death was prior to the year the Original Deceased owner would have reached RMD age.

c. The Spouse Beneficiary did not elect to begin Life Expectancy Distributions prior to their Date of Death

d. The Spouse Beneficiary Date of Death is prior to January 1 of the year the original owner would have reached RMD Age.

Generally, the beneficiary or beneficiaries of the deceased spouse owner of the Inherited IRA are eligible to be treated as if they are a Beneficiary of the Surviving Spouse's IRA and not as a Successor Beneficiary.

ADDITIONAL INFORMATION - LEXICON

At Least As Rapidly Rule: Where the deceased owner of an IRA was subject to RMD, either an original owner whose date of death is on or after their RBD or the owner of an inherited IRA who was required to, or elected to take Life Expectancy Distributions as of the date of their death, the beneficiary or Successor Beneficiary is required to take annual life expectancy distributions each year by 12/31 starting in the year after the year of the owner's death.

Separate Account Rule: Where the deceased owner had multiple designated beneficiaries all beneficiaries are required to use the birth date of the eldest beneficiary on record unless they have moved the assets into a separate IRA account for the beneficiary by 9/30 of the year after the year in which the owner's death occurred for their required minimum distribution (RMD) to be calculated using their date of birth (where that option is applicable).

Where the original IRA owner's death occurred on or after 1/1/2020, certain designated beneficiaries, some trusts, a charity, an estate, and other entity beneficiaries will be required to distribute the entire IRA balance no later than the end of a specific period of time, either 10 years (for a designated beneficiary that is an individual who is not an Eligible Designated Beneficiary) or 5 years (for an estate, charity, or other entity, including a trust that is not a qualified "look-through" trust).

5-year rule: The 5-year rule only applies where the original owner of the IRA died prior to their RBD. Under this rule no distributions need be taken in the first 4 years, the ONLY distribution required is a full distribution of any assets in the Inherited IRA by December 31 of the 5th year following the year of death of the original owner, amounts not distributed by this date may be subject to an Excess Accumulation Excise Tax.

- A Non-Designated Beneficiary: where the original owner's date of death is prior to their RBD must use the 5-year rule. A Designated Beneficiary who is eligible for Life Expectancy Distributions is not required to use the 5-year rule and should speak with a qualified tax professional if any annual distributions were not taken in a timely manner should they wish to start taking *Life Expectancy Distributions*.
- A Designated Beneficiary: Where the original owner died prior to January 1, 2020, and prior to their RBD the Original Designated Beneficiary could elect to distribute the assets over their life expectancy, however they were not required to take life expectancy distributions, they could elect to use the 5-year rule.
- A Successor Beneficiary: Where a Designated Beneficiary (other than a spouse beneficiary) elected to use the 5-year rule and subsequently dies prior to the end of the 5th year after the year of the owner's death, the beneficiary of the Inherited IRA i.e., the successor beneficiary is subject to the original 5-year deadline. See above there is an exception where the beneficiary is the spouse of the original owner, and they die prior to the year the original owner would have reached RMD age.

10-year rule: The 10-year rule requires a Designated Beneficiary distribute all inherited retirement assets by December 31 of the 10th year following the year of the owner's death. Any amount remaining after that date may be subject to an **Excess Accumulation Excise Tax**. An exception applies to an EBD taking life Expectancy Distributions.

- Original Owner's Death Prior to RBD – No other distributions are required.
- Original Owner's Death on or After RBD – The beneficiary is also required to take annual *Life Expectancy Distributions* starting no later than December 31 of the year following the year of the owner's death and each year after by December 31. This is required in addition to distribution of any remaining balance in the inherited IRA by December 31 of the tenth year following the year of the owner's death.
 - The deadline for the first distribution of no later than 12/31 of the year after the year of the owner's death applies where the owner died in or after 2023. IRA assets inherited due to the death of an owner at or over RBD where death occurred in 2020, 2021 or 2022 are not retroactively subject to the requirement for life expectancy distributions to begin no later than 12/31 of the year after the year of the owner's death. The IRS will not impose excess accumulation penalties/late RMD penalties for payments due to those payments that would have been due on or prior to 12/31/2023. These beneficiaries must begin to take Life Expectancy Distributions at least annually starting no later than 12/31/2024, and by 12/31 each year after and comply with the 10-year rule based on the owner's date of death.

Excess Accumulation Excise Tax aka Late RMD Penalty: Assets may not remain in an Inherited IRA indefinitely. When a beneficiary is required to distribute assets if they fail to do so then amount required to be distributed that is not distributed is potentially subject to an additional 25% tax. If the distribution is taken late but within 2 years of the original due date, the excise tax may be reduced to 10%. Speak with a qualified tax professional for additional information. This applies to required distributions under the 5-year rule, the 10-year rule, and Life Expectancy Distributions that are not taken by the date they are due.

ADDITIONAL INFORMATION LIFE EXPECTANCY DISTRIBUTIONS

Where applicable the beneficiary of retirement assets may either have the option to, or a requirement to, take Life Expectancy distributions at least annually starting by December 31st of the year after the year of the owner’s death. Life Expectancy distributions for Inherited IRAs are based on IRS Table I - Single Life Expectancy - For Use by Beneficiaries from *IRS Publication 590-B Distributions from Individual Retirement Arrangements (IRAs) Appendix B* - below is the Single Life Expectancy Table applicable to distributions for 2022 and includes life expectancy for ages from 0 (a newborn) to 121+.

To determine the amount of Life Expectancy distributions for a beneficiary starting in the year following the year of the original owner’s death the dollar value of the inherited retirement assets as of 12/31 of the year of death are divided by the appropriate Life Expectancy, which depends on whose life expectancy is to be used. The applicable Age based on the age the person beneficiary would be as of 12/31 of the applicable year:

1. The Deceased original owner the year of death is the applicable year
2. *Designated Beneficiary (other than a Spouse beneficiary) the year after the year of the original owner’s death is the applicable year
3. *Designated Spouse Beneficiary, their age as of 12/31 of each year is applicable

*Where the beneficiary does not meet the Separate Account Rule the age of the eldest of the beneficiary by 12/31 of the year after the year of the original owner’s death may be the applicable age. See also qualified look-through trust.

The Life expectancy from Table I next to the applicable Age represents an adjusted average Life Expectancy determined by the IRS based on all individuals who attain that age.

From IRS Publication 590-B Appendix B											
Table I											
(Single Life Expectancy)											
(For Use by Beneficiaries)											
Age	Life Expectancy	Age	Life Expectancy	Age	Life Expectancy	Age	Life Expectancy	Age	Life Expectancy	Age	Life Expectancy
0	84.6	20	65.0	40	45.7	60	27.1	80	11.2	100	2.8
1	83.7	21	64.1	41	44.8	61	26.2	81	10.5	101	2.6
2	82.8	22	63.1	42	43.8	62	25.4	82	9.9	102	2.5
3	81.8	23	62.1	43	42.9	63	24.5	83	9.3	103	2.3
4	80.8	24	61.1	44	41.9	64	23.7	84	8.7	104	2.2
5	79.8	25	60.2	45	41.0	65	22.9	85	8.1	105	2.1
6	78.8	26	59.2	46	40.0	66	22.0	86	7.6	106	2.1
7	77.9	27	58.2	47	39.0	67	21.2	87	7.1	107	2.1
8	76.9	28	57.3	48	38.1	68	20.4	88	6.6	108	2.0
9	75.9	29	56.3	49	37.1	69	19.6	89	6.1	109	2.0
10	74.9	30	55.3	50	36.2	70	18.8	90	5.7	110	2.0
11	73.9	31	54.4	51	35.3	71	18.0	91	5.3	111	2.0
12	72.9	32	53.4	52	34.3	72	17.2	92	4.9	112	2.0
13	71.9	33	52.5	53	33.4	73	16.4	93	4.6	113	1.9
14	70.9	34	51.5	54	32.5	74	15.6	94	4.3	114	1.9
15	69.9	35	50.5	55	31.6	75	14.8	95	4.0	115	1.8
16	69.0	36	49.6	56	30.6	76	14.1	96	3.7	116	1.8
17	68.0	37	48.6	57	29.8	77	13.3	97	3.4	117	1.6
18	67.0	38	47.7	58	28.9	78	12.6	98	3.2	118	1.4
19	66.0	39	46.7	59	28.0	79	11.9	99	3.0	119	1.1
										120+	1.0

1. **Deceased Owner:** The deceased owner’s life expectancy is used to determine Required Beneficiary Life Expectancy Distributions only when (1) the deceased owner’s date of death is on or after their RBD when the “At Least As Rapidly” rule applies and (2) The beneficiary is:
 - a. A Non-Designated Beneficiary, such as the owner’s estate, a charity and trusts that are not a qualified look through trust.
 - b. A Designated Beneficiary whose year of birth is two (2) or more years earlier than the year of the deceased owner’s year of birth, in which case the deceased owner’s longer life expectancy would be used.

Where applicable the owner’s non-recalculated Life Expectancy is determined based on the age the owner would have reached by 12/31 of the year of death. The Life expectancy for that age is used and reduced by 1 for each additional year. Example an owner born 12/31/1948 whose death occurred on 5/1/2023 would have reached age 74 as of that date, which is after their RBD. The beneficiary is a designated beneficiary born in 1942, since that is more than 2-year prior to the year the original was born the applicable age is 75, which is the deceased owner’s age

as of 12/31/2023. The life expectancy for age 75 is 14.8 years, for each year after the year of death the life expectancy is reduced by 1, which means for 2024 the first year where the Life Expectancy Distribution calculation for the beneficiary would apply the deceased owner's life expectancy factor is 13.8 years (14.8 – 1 year since the year of death).

2. **Spouse beneficiary:** Their life expectancy is recalculated annually based their age as of 12/31 of each year.

a. If the original owner died on or after RBD and the owner's remaining life expectancy as of the year following the year of the original owner's death is longer than the spouse beneficiary's life expectancy for that year than the original owner's life expectancy is used. If the spouse beneficiary with a shorter initial life expectancy is eligible for recalculated life expectancy (see *separate account rules*) and their recalculated life expectancy becomes longer in any year after the spouse beneficiary may request the custodian start to use their recalculated life expectancy moving forward.

3. **Non-spouse beneficiary:** Life expectancy is determined based on their age by 12/31 of the next year after the year during which the original owner's death occurred. See **Deceased Owner** above if the owner was born two (2) or more years after the beneficiary then the owner's life expectancy calculation as of the year following the year, they died is longer than the non-spouse beneficiary's life expectancy, the original owner's longer life expectancy is used.

ADDITIONAL INFORMATION - OTHER FACTORS THAT MAY IMPACT BENEFICIARY RMD REQUIREMENTS.

- This form may not include options for determining RMD that may be available based on obtaining a Private Letter Ruling (PLR) from the IRS, please be aware that a PLR is applicable only to the specific taxpayer to whom it was granted. A PLR granted to another taxpayer does not create a legal precedent that other taxpayers with similar circumstances may take the same action. If you obtain a PLR specific to the deceased owner and beneficiary for the Cromwell Funds account, please submit a copy and a letter of instruction with MSG along with this form for the custodian's records.
- **Trust as Beneficiary:** Generally, consistent with the Internal Revenue Code, BNYM IS Trust Co. "the custodian", will treat an entity (such as a trust) that is named as a retirement account beneficiary as a non-designated beneficiary. However, a trust that is a "qualified look through trust" may be treated as a "designated beneficiary" solely for the purpose of determining distribution requirements. To be treated as a "qualified look through trust", the trust must meet the following conditions:
 - The trust is a valid trust under state law or would be but for the fact that there is no corpus.
 - The trust is irrevocable or, by its terms, will become irrevocable upon the participant's death.
 - The beneficiary(ies) of the trust is/are identifiable from the trust instrument, and such beneficiary(ies) is/are individuals.
 - Certain timely documentation has been provided to the IRA custodian.

A trust meeting the above criteria may be treated as a designated beneficiary, solely for determining the distribution period for payments made to the trust, based on the date of birth of the beneficiary of the trust (or, if there are multiple beneficiaries, the trust beneficiary with the shortest life expectancy). If any beneficiary of the Trust is a non-individual (such as an estate or charity) or any of the other criteria above is not met, the assets are treated as having no designated beneficiary for purposes of determining the distribution period, even if there are also individuals designated as beneficiaries of the Trust.

We recommend you speak with a qualified legal or tax professional to confirm whether the Trust is a "qualified look through trust", so you understand the available options.

- RMD calculations are done by BNYM IS Trust as custodian based on the balance in the specified Cromwell Funds Inherited IRA or Inherited Roth IRA only.
 - If you have other Inherited IRAs or Inherited Roth IRAs with Cromwell Funds, submit a separate form to request RMD calculations for each account.
 - If you have other Inherited IRAs or Inherited Roth IRAs with other institutions, the RMD amount BNYM IS Trust calculates will not include the balance in those separate accounts, you should contact the other institution or consult with a qualified tax professional to determine the required distribution amount.
- Distributions for more than the amount required each year cannot be returned to the Inherited IRA account. Please be sure to complete this form carefully.