

[Current Date]

Re: Important Information Regarding Unrelated Business Taxable Income

Dear Valued Client,

Thank you for choosing Columbia Private Trust (CPT). As you may know, investment income in an individual retirement account (IRA) or other qualified retirement account may become subject to taxation for its unrelated business taxable income (UBTI). If an IRA or other qualified retirement account has UBTI, including unrelated debt-financed income (UDFI) of \$1,000 or more during the previous tax year, IRS regulations require the filing of an IRS Form 990-T. In some cases, the filing of state and/or foreign returns may also be required.

The types of assets that generate UBTI/UDFI include the following:

- Partnerships, including limited partnerships, master limited partnerships, and publicly traded partnerships.
- Limited liability company interests when acting as an operating company and treated as a partnership for federal tax purposes; and
- Debt-financed real estate.

For partnership and limited liability company investments, the amount of income subject to UBTI tax is generally reported on IRS Schedule K-1 (Form 1065), which should be provided by the investment's asset sponsor. For debt-financed real estate investments held in an IRA, consultation with a tax adviser is recommended to determine the portion of any income considered UDFI.

Filing Deadlines

- The deadline for filing IRS Form 990-T and paying any associated UBTI tax for an IRA in 2025 is April 15, 2026. State and foreign filing and their associated payment deadlines may vary.
- The IRS Form 990-T filing deadline may be extended to October 15, 2026 by filing IRS Form 8868 no later than April 15, 2026.

NOTE: If IRS Form 8868 is filed to extend the filing deadline to October 15, 2026, the extension DOES NOT extend the deadline for paying any associated UBTI tax. Interest and, in certain circumstances, penalties will be assessed for any tax not paid by the April 15, 2026 deadline. Rules for extensions of state and/or foreign filing and/or payment deadlines may vary.

Your Filing Options

Under the terms of our custodial agreement, you are responsible for ensuring the timely filing of any required IRS Form 990-T (including payment of any taxes due with funds from your IRA). To fulfill this obligation, you may prepare, or use your own tax professional to prepare, and electronically file any required IRS Form 990-T (the "Self-Service Option") or direct that Columbia Private Trust arrange for the preparation and filing of any required IRS Form 990-T and associated state or foreign returns (the "Direct Service Option").

- **Self-Service Option.** If you desire the Self-Service Option, you must complete the enclosed UBTI 990-T Self-Service Filing Election Form and return the fully completed document to us no later than **April 1, 2026**. If you elect to extend the filing deadline for the IRS Form 990-T by filing Form 8868, you must also provide the additional filing information to us no later than **October 1, 2026**.

- **Direct Service Option.** If you prefer the Direct Service Option, you must complete the enclosed UBTI 990-T Direct Service Filing Election Form and return it to us with all required supporting documentation no later than **March 15, 2026**. If you fail to provide CPT with any of the required items by the requested deadline for information, **we will not file Form 990-T, an extension for Form 990-T, or any state extensions or state returns for any of your accounts.** Consequently, you will be responsible for filing any required extension on Form 8868 for any accounts where Form 990-T is required to be filed, unless you specifically instruct CPT to file an extension for your 990-T and any state returns on the election form. A fee will be charged for any extensions filed by CPT. If an extension is not filed, you will be responsible for any penalties and interest that may be assessed by the IRS or state jurisdictions.

Regardless of which option you select, or whether you fail to select an option in a timely manner, you and/or your account will be responsible for all taxes and penalties (if any) associated with your account. NOTE: When UBTI tax is due, it is an expense of the account and must be paid with funds from the retirement account. As such, we encourage you to ensure there is sufficient cash in your account to pay any applicable UBTI tax or penalties.

Employer Identification Number (EIN)

The Internal Revenue Service (IRS) requires each retirement account that files Form 990-T use an account-specific EIN. This is different from Columbia Private Trust's EIN, which may be listed in Box E, Part II of the K-1, or your Social Security Number. Additionally, the IRS now requires the asset sponsor to list the EIN for your retirement account in box 20 of the K-1 using code AR if they show UBTI in box 20. You may need to forward the EIN of your retirement account to your accountant (if your accountant will prepare and file the 990-T) and the asset sponsor generating the K-1.

You can direct your accountant to apply for an EIN for your retirement account, or you can direct Columbia Private Trust to apply for an EIN. If you choose to have Columbia Private Trust apply for an EIN for your retirement account, you will need to complete a Form SS-4 and designate Columbia Private Trust as the third-party designee, then sign and return the completed form. The Form SS-4 can be obtained from the IRS website at [IRS.gov](https://www.irs.gov).

We encourage you to consult with your tax adviser regarding the enclosed documents and any questions you may have about UBTI taxes. IRS Publication 598 also contains information about UBTI. This publication, along with IRS Form 990-T and filing instructions, can be found at [IRS.gov](https://www.irs.gov) or by calling the IRS at 877.829.5500.

If you have any questions about this letter or its contents, please contact a member of our Client Services team at 800.962.4238, Monday - Friday, 7:00 a.m. - 5:00 p.m. MT, or via email to clients@columbiaprivatetrust.com.

We thank you for your attention to this important matter.

Sincerely,

Columbia Private Trust

Enclosures

UBTI Election Forms (Directed Service & Self-Service Options)
UDFI Worksheet (for IRAs with debt-financed real estate)

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NON-DEPOSIT INVESTMENT PRODUCTS ARE NOT INSURED BY THE FDIC; ARE NOT DEPOSITS OR OTHER OBLIGATIONS OF, OR GUARANTEED BY, THE BANK OR ANY OF ITS DIVISIONS; AND ARE SUBJECT TO INVESTMENT RISKS, INCLUDING POSSIBLE LOSS OF THE PRINCIPAL AMOUNT INVESTED.

UBTI 990-T Self-Service Filing Election Form

Complete this Election Form if you wish to prepare, or use your own tax professional to prepare, and electronically file any required IRS Form 990-T and related state filings (the “Self-Service Option”).

This UBTI 990-T Filing Election Form applies to the following retirement account(s) held with Columbia Private Trust (“CPT”):

Name: _____	Account No.: _____

If you list multiple accounts, your election will apply to all the accounts listed on this form. If you have accounts that need a different treatment, please complete a separate form for those accounts.

Under the terms of your custodial agreement, you are responsible for ensuring the timely filing of any required IRS Form 990-T and applicable state returns (including payment of any taxes due with funds from your retirement account(s) as well as any applicable extensions). By selecting the Self-Service Option, you must prepare, or use your own tax professional to prepare, and electronically file any required IRS Form 990-T and related state filings (“Self-Service”).

You must provide the following item(s) to Columbia Private Trust no later than **April 1, 2026**:

- This fully completed UBTI 990-T Self-Service Filing Election Form for each account listed above that is signed by you certifying either:

Choose One:

I certify that my account(s) did not have UBTI of \$1,000 or more and that an IRS Form 990-T is not required to be filed with respect to that account for 2025; or

I certify that IRS Form 990-T was filed (or will be filed) with respect to your retirement account for 2025. NOTE: You must also provide us with a copy of the IRS Form 990-T that was filed for your account for 2025, as well as confirmation from the IRS that the IRS Form 990-T was filed electronically, including the filing number (with evidence of the date the return was filed). **If applicable, you must also provide confirmation of any state returns filed electronically or forward to CPT any paper returns for states that do not require electronic filing. CPT will sign the paper state returns and forward them to the state taxing authorities with payments due.**

OR

- Provide a copy of Form 8868 extending the IRS Form 990-T filing deadline for your IRA to October 15, 2026, as well as proof of filing. If you file Form 8868, then by no later than October 1, 2026, you must also provide us with a copy of the IRS Form 990-T that was filed for your account for 2025, as well as confirmation from the IRS that the IRS Form 990-T was filed electronically, including the filing number (with evidence of the date the return was filed).

Delivery Information

Please return this completed election form and any accompanying documents to us by mail or email addressed to:

<u>Mail</u> Columbia Private Trust Processing Center P.O. BOX 981012 Boston, MA 02298	<u>Email</u> regulatoryreporting@columbiaprivatetrust.com
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Acknowledgement and Agreement

It is the retirement account owner's obligation to ensure timely payment of any UBTI tax that may be owed. When UBTI tax is owed, it is an expense of the account and must be paid with funds from the retirement account. As such, the retirement account owner should ensure there are sufficient funds in the account to pay any applicable UBTI tax or penalties.

By signing this form, you are authorizing CPT to pay the amount of tax showing as due on the 990-T and any state returns from the accounts listed above. CPT will also pay any estimated taxes listed in the payment instructions received from your accountant unless you check the box indicating you do not want CPT to pay the estimated taxes.

By checking this box, I am instructing CPT to **not** pay any estimated taxes.

You and your tax professional are responsible for filing any required extension on Form 8868 for any accounts where Form 990-T is required to be filed and any state extensions. If an extension is not filed, you will be responsible for any penalties and interest that may be assessed by the IRS or state jurisdictions.

SIGNATURE	PRINT NAME
DATE	

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UBTI 990-T Direct Service Filing Election Form

Complete this Election Form if you wish to direct Columbia Private Trust (“CPT”) to arrange for the preparation and filing of any required IRS Form 990-T and associated state or foreign returns (the “Direct Service Option”).

This UBTI 990-T Filing Election Form applies to the following retirement account(s) held with Columbia Private Trust:

Name: _____	Account No.: _____

If you list multiple accounts, your election will apply to all the accounts listed on this form.

You must provide the following item(s) to Columbia Private Trust by no later than **March 15, 2026**:

- For UBTI other than UDFI (e.g., LP or LLC Interests): All relevant Schedule K-1’s (with a copy of prior returns if you intend to use prior losses to offset income). **If your IRA or retirement account owns 2% or more of any partnership or LLC, please provide specific information about such partnership or LLC when you provide the Schedule K-1 for that entity.**
- For UDFI: Completed UDFI Worksheet for each debt-financed real estate property that generated income in your retirement account during the 2025 tax year. **We cannot prepare the 990-T or any state returns without a completed UDFI Worksheet. If the UDFI worksheet is not complete, it will be returned to you. CPT cannot complete the UDFI Worksheet on your behalf.**

We will use the information you provide us to arrange for the preparation and filing of the IRS Form 990-T for each retirement account listed above. The following fees will be charged to your retirement account(s) for this service for each tax year the returns are prepared:

- IRS Form 990-T filing: \$1,400 per filing
- State Form Filing: \$500 per state filing
- Foreign Filing: \$500 per filing
- Filing Extension: \$500 each
- Schedule K-1 Review: \$100 if the K-1 is reviewed but no return is required¹

Standard Hourly Rates:

- Washington National Tax: \$1,150
- Partner/Principal: \$750
- Managing Director: \$750
- Senior Manager: \$550
- Manager: \$400
- Senior Tax Associate: \$300
- Tax Associate: \$250

Returns requiring more than three hours of preparation time may be charged an additional fee of \$200 per hour.

¹If you elect the Direct Service Option, and after review by the tax preparation vendor, it is determined no filing is required, you will be assessed a \$300 fee for reviewing the K-1s to arrive at that determination.

If we do not receive all required items from you by March 15, 2026, it may delay the preparation of the returns or cause the returns to not be prepared. We will notify you of the amount of any UBTI tax due as soon as the returns are received from the tax preparer. You will be responsible for any delay or inaccuracy in any IRS Form 990-T filings and/or any applicable state or foreign UBTI filings (together with any associated penalties) that may arise as a result of your failure to timely provide us with accurate information needed to perform this service. If you fail to provide CPT with any of the required items by the requested deadline, **we will not prepare and file Form 990-T, an extension for Form 990-T, or any state returns for any of your accounts.**

Consequently, you will be responsible for filing any required extension on Form 8868 for any accounts where Form 990-T is required to be filed, unless you specifically instruct CPT to file an extension(s) for 990-T and any state returns for the account(s) you identify on this election form. A fee will be charged for any extensions filed by CPT. Please keep in mind that if an extension is required but not filed, you will be responsible for any penalties and interest that may be assessed by the IRS or state jurisdictions.

Delivery Information

Please return this Election Form and all other required or supporting documents to us by mail or email sent to the following address:

<p><u>Mail</u> Columbia Private Trust Processing Center P.O. BOX 981012 Boston, MA 02298</p>	<p><u>Email</u> regulatoryreporting@columbiaprivatetrust.com</p>
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Acknowledgement and Agreement

By signing below, you (a) confirm that you have selected the Direct Service Option for preparation and filing of any required IRS Form 990-T for the 2025 tax year, and (b) agree to the requirements and other conditions outlined in this Election Form. Additionally, by signing this form, you are authorizing CPT to pay the amount of tax showing as due on the 990-T and any state returns. CPT will also pay any estimated taxes listed in the payment instructions unless you check the box below **indicating you do not want CPT to pay the estimated taxes.**

By checking this box, I am instructing CPT to **not** pay any estimated taxes.

Authorization to File an Extension

By checking this box, I instruct CPT to file an extension for my 990-T and any state returns and pay the estimated tax.

SIGNATURE	PRINT NAME
DATE	

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UDFI Worksheet

Note: The UDFI Worksheet must be completed in its entirety, or it will be returned to you. Columbia Private Trust will not complete the UDFI Worksheet on your behalf.

Please complete one UDFI Worksheet per applicable property held in your IRA. Please make copies as needed if you are providing information for multiple properties, or you are providing information about a property for different tax years.

TAX YEAR			
ACCOUNT NUMBER			
TAXPAYER (IRA) EIN ¹			
ACCOUNT NAME ASSOCIATED WITH EIN ABOVE (E.G., "John Doe Roth IRA")			
PROPERTY ADDRESS			
DATE PROPERTY ACQUIRED			
(If Applicable) DATE SOLD			
AVERAGE ADJUSTED BASIS FOR PROPERTY ²	\$		
		AMOUNT OF LOAN/MORTGAGE OUTSTANDING BALANCE	
		• Beginning of January	\$ -
Gross Income from Property	\$ -	• Beginning of February	\$ -
Straight Line Depreciation Amount	\$ -	• Beginning of March	\$ -
Deductions Directly Related to Property		• Beginning of April	\$ -
• Property Taxes	\$ -	• Beginning of May	\$ -
• Mortgage Interest	\$ -	• Beginning of June	\$ -
• Utilities	\$ -	• Beginning of July	\$ -
• Repairs and Maintenance	\$ -	• Beginning of August	\$ -
• Other—provide description	\$ -	• Beginning of September	\$ -
• Other—provide description	\$ -	• Beginning of October	\$ -
• Other—provide description	\$ -	• Beginning of November	\$ -
TOTAL DEDUCTIONS DIRECTLY RELATED TO PROPERTY	\$ -	• Beginning of December	\$ -
		AVERAGE ACQUISITION DEBT ON PROPERTY	\$ -

¹ This is not your SSN. Your IRA must obtain its own EIN for filings. Columbia Private Trust can assist if you have not obtained an EIN for your IRA.

² If adjusted cost basis isn't provided we will use the original purchase price of the property to prepare the 990-T.

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