

Example of Steps to Implement Any Final Names Rule Amendments

- Legal, compliance, operations review final rule and consider impact to fund names and strategies and consider whether to change any fund names and strategies.
- Seek board approval and, if necessary, shareholder approval of such changes.
- Draft and adopt policies and procedures to comply with new requirements and consider whether to seek board approval of such new or updated policies.
- Consider whether to design, modify, or acquire systems and whether to engage third-party vendors to facilitate compliance with new requirements.
- Review and amend fund disclosure documents to update information about fund names and strategies.
- If registration statement disclosure changes are made through the 485(a) process, receive and respond to disclosure review staff comments as the staff interprets the new rule requirements for the first time.
- Draft, print and mail shareholder notices of changes.