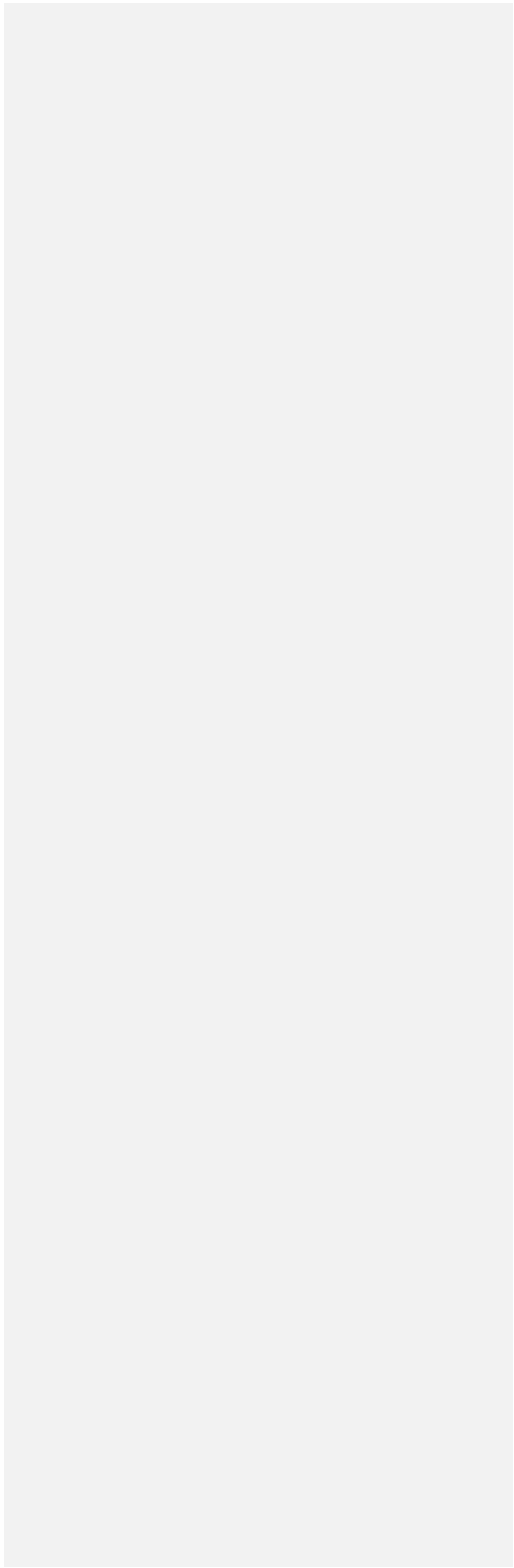

Plan Administrative Guide

Plan Name: Unitarian Universalist Organizations Retirement Plan
Plan Number: 140071



Plan Account Access

Overview

The Plan Service Center (PSC) website is a comprehensive plan management and education tool designed to provide Clients, Advisors, and other designated plan contacts with access to the plan virtually 24 hours a day, consistent with the availability of the automated voice response system.

Plan Sponsor PSC Website	https://www.empower-retirement.com/sponsor
To change plan contact, address, participation agreement:	Email: retirementplan@uua.org

Clients may use the PSC to inquire or make changes while administering the Plan. Upon request, representatives are available to assist and train the Client's administration staff in properly accessing and processing transactions on the PSC. Depending upon the level of access, users will be able to run reports based upon employer location, utilize file sharing, and review items in the fiduciary center.

PSC Initial Login

Once access has been added or changed, PSC users receive two emails containing their temporary log-in credentials. Upon initial login, users are prompted to verify their personal information and establish personalized long term log-in credentials. Users have the option to create a customized username by replacing the default username provided.

PSC Password Resets and Locked Accounts

PSC passwords are required to be reset every 180 days. Email notifications are sent to users approaching their password reset deadline.

To reset a PSC password, access the *Login Help* link on the PSC Login page. Users follow the prompts, answer security questions, and establish a new password. During the password reset sequence users are prompted to confirm their identity by authenticating an unique verification code that is sent via text, email, or phone call.

The unique verification code is sent to the user according to the delivery method selected. The user enters the verification code along with a new password. Upon successful completion of the Password Reset security validation, users are directed back to the main login page to login with their newly established password.

PSC user access is locked after three unsuccessful login attempts. The Service Team can assist in coordinating password resets for locked user access with Empower's Internal Security Team.

NOTE: Users must login at least once every 12 months to prevent the User ID from terminating.

PSC Access Levels

PSC users have limited access based upon the location that you represent. Your access allows you to:

Participants	<ul style="list-style-type: none">• Add new employees• Review existing participant information• Access participant request forms• Obtain view only access to participant accounts via the Participant Website Emulator• Upload participant demographic data• • NOTE: Participant account transactions cannot be processed through Participant Website Emulator.
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Reports	<ul style="list-style-type: none"> • Request on demand reports for your location designed to assist in retirement plan administration • Retrieve feedback files and reports for your location related to recordkeeping services including eligibility, deferral changes, and loan administration • Data library feature providing plan analytic <u>data</u>
Fiduciary Center	<ul style="list-style-type: none"> • View plan documents and important notices • Request participant data to assist with tracking notice campaigns • Request audit documentation
File Sharing	<ul style="list-style-type: none"> • Upload and download files and documents securely • Transmit and share information with Empower, service teams, and other third party service providers

Commented [WM1]: Would they be able to view this?

Commented [CH2R1]: Yes by division level. Plan dashboard will be for the whole plan

Participant Account Access

Overview

Generally, participants have direct access to their retirement accounts 24 hours a day, seven days a week via the following channels:

- Online via the participant online account.
- Over the phone using Empower's automated phone menu.

Participant Service Center Representatives are generally available weekdays from 7 a.m. to 9 p.m. Eastern time and Saturdays from 9 a.m. to 5:30 p.m. Eastern time unless otherwise agreed to between the Client and Empower.

Participant Service Center toll-free phone number	833-UUA-2023
Employee/Participant outside of the U. S.	1-303-737-2583
Employee/Participant TTY phone number for hearing- or speech-impaired callers	1-800-830-9017
Participant online account	uuaempower.com

Security and Authentication

Participants are required to provide additional authentication before access to an account is granted. The additional authentication method varies based on the following factors:

- Access Channel
- Initial or Subsequent Access

Initial Online Account Access

Participants are required to complete the registration process by entering:

- The following Personally Identifiable Information (PII) at uuaempower.com. Participants should click on the register tab and follow the prompts on the *I do not have a PIN tab*.

When the information entered matches the participant's account data on Empower's recordkeeping system, the participant follows the online prompts and answers security questions to establish their long-term log-in credentials.

Subsequent Online Account Access

Subsequent account access uses multi-factor authentication to provide an additional level of security. Participants are prompted to confirm their identity upon subsequent logins by requesting a verification code (text, email, phone call).

A unique verification code is sent to the participant according to the delivery method selected. The participant enters the verification code to proceed with account access. Participants may also choose to register each electronic device to bypass the multi-factor authentication process for future logins from the same device.

Automated Phone Menu

When individuals call the Participant Service Center, they are prompted by the automated phone menu to provide their SSN and PIN before gaining access to their account.

Once authentication is successfully completed, participants are able to access account options within the automated phone menu or choose to speak to a Participant Service Center Representative during business hours. Authentication information entered by the participant is displayed to the Participant Service Center Representative so the caller is not asked to repeat information already validated.

Alternative Authentication

If a participant calls the Participant Service Center and does not have nor remember their PIN, the participant is given the option to have a temporary PIN sent to them via their preferred delivery method on file (email, phone, address of record).

NOTE: When no delivery method is on file or if a temporary PIN cannot be generated via the automated phone menu, the caller is connected with a Participant Service Center Representative. The Participant Service Center Representative performs enhanced authentication before resetting the PIN, providing account information, or transacting on behalf of the participant.

Account Activity and Channels

When an account change requires a participant to provide additional supporting documentation or authorization, such as spousal consent, a form is required. Forms are available online and/or can be mailed or emailed by the Participant Service Center Representative.

The following table provides a high-level overview of the types of account activity available through each account access channel.

Account Activity	Service Center Representative	Automated Phone Menu	Online
Obtain Account Balance	✓	✓	✓
Obtain Fund Performance Information	✓	✓	✓
Review Recent Account Activity	✓	✓	✓
Review or Request Statements	✓	✓	✓
Change Contribution Rate	✓	✓	✓
Change Investment Elections	✓	✓	✓
Transfer Balances Between Funds	✓	✓	✓
Update Profile Information	✓	✓	✓
Update Beneficiary – married, spouse OR not married	Form Required		✓
Update Beneficiary – married, non-spouse (notary required)	Form Required		Form Required
Set up Participant Banking Information for ACH	✓		✓

Account Withdrawals and Channels

Withdrawal options are plan-defined and only made available to participants when allowed by the plan.

When a withdrawal request requires a participant to provide additional supporting documentation or authorization, such as spousal consent, a form is required. If the participant requests for a form to be mailed, the form is sent to the participant's address of record.

The following provides a high-level overview of the types of distributions that can be requested through each account access channel.

Withdrawal Type	Service Center Representative	Automated Phone Menu	Online
Age 59 ½	✓		✓
Death Claims	Form Required		Form Required
Disability	Form Required		Form Required
General Purpose Loan	✓	✓	✓
Hardship Loan	Form Required		Form Required
Hardship Withdrawal	Form Required		Form Required
In Service	✓		✓
Principal Residence or Mortgage Loan*	✓	✓	✓

Withdrawal Type	Service Center Representative	Automated Phone Menu	Online
Qualified Military Service	Form Required		Form Required
Required Minimum Distribution	✓		✓
Separation of Service	✓		✓

*Additional supporting documentation required and must be provided separately before processing can continue.

Participant Form Submission

When submitting forms or required documentation to Empower, participants can either mail the information to Empower as directed or submit through the participant online account via the document upload feature.

Online Account Tools

Estimated Retirement Income

The Estimated Retirement Income feature provides participants with an estimated hypothetical monthly retirement income and goal based on a number of factors including the participant's plan assets, plan contribution rates, and compensation data.

Health Cost Estimator

Health Cost Estimator provides participants with estimated monthly health care expenses based on retirement age and certain personal health condition information provided by participants. All health care costs and projections are provided by an unrelated third party vendor.

My Financial Path

The financial wellness program (My Financial Path) offers tools and services to participants so they are able to review their overall financial wellness and may include information on financial products and services made available by Empower or third party providers. More information on the applicable financial products and services is available upon request.

My Financial Path includes a "Next Step Evaluator" tool that allows participants to complete a personalized online assessment, the output of which provides participants with ideas on next steps they can take to address certain financial concerns they identified when completing the assessment.

Additional educational resources are available to participants to learn more about financial topics of interest, including a learning center with educational content on certain financial wellness topics. Empower or its affiliates may make retirement education consultants available to participants to provide financial wellness consultations.

Retirement education consultants may contact participants to consult on My Financial Path tools and services and may discuss certain financial products and services during the consultation.

Consultations involve topics such as (but not limited to): budgeting, saving, student debt, debt prioritization, life insurance, managing investments and consolidating assets. Participants may pay fees if they choose certain products available through My Financial Path (see the product fee schedule(s), if applicable, for more detail).

Participant Experience

Components of the plan's employee and participant communication and education programs may include the following:

- Needs-based campaigns ranging from participation through retirement.
- Enrollment communications.
- Multi-channel engagement to reach employees based on their preferences, including email, video, mobile, over the phone, and in-person.
- On-site universal and plan-specific webinars, e-learning sessions, seminars, and meetings tailored to the Client's needs and timing.
- Plan awareness and enhancement communications.
- Statement and online account messages.
- Transaction and regulatory notices including those associated with plan design changes, merger and acquisition activity, fee and fund changes, etc.

Participants also have access to a comprehensive participant online account, automated phone menu, Participant Service Center Representatives, and other educational and planning resources.

Automated Email Messaging

Participants and eligible employees with an email address on file with the recordkeeper receive Personalized Participant Communications (PPC) email messaging according to the participant's and eligible employee's specific status. Messaging and actionable steps are determined based on criteria such as employee and participant data (e.g., age, account balance, activity) and services offered within the plan.

PPC messaging may be delivered weekly and are multi-touch to provide reminders designed to encourage action. Each individual is targeted with only one message stream at a time. Messaging may include:

- Information about the tools and services available in the plan and what actions they may take to build savings, enrolling in the plan, designating beneficiaries, increasing contributions, asset allocation, catch-up contributions, and more.
- General financial information that may be helpful as they strive to reach their financial and savings goals through budgeting, debt management, investing basics, emergency funds, and more.
- Opportunities to view additional options that may provide a more comprehensive savings strategy including information about estate planning, college savings, and more.

NOTE: Participants can opt out of receiving these emails at any time.

Eligibility & Participation

Overview

A Plan's eligibility provisions define the conditions that must be met by an employee in order to participate in the Plan. When Plan provisions provide for an immediate eligibility rule, employees are eligible to participate on their hire date.

Empower assists Clients with administering Plan eligibility rules by:

- Identifying which employees are newly eligible.
- Generating and posting Eligibility reports to the Plan Service Center (PSC) for Client review.
- Providing required Plan notices and/or enrollment materials as applicable.

Identifying Newly Eligible Employees

Clients must include employee hire dates on payroll files (or demographic data files if transmitted separately from contributions) to notify Empower when new employees are hired and are newly eligible.

If Plan provisions specify that certain classes of employees are not eligible to participate in the Plan (excluded Classes), Clients may use any one of the following methods to identify ineligible employees based on payroll or demographic data file design:

Method	Description
Exclude from File	<ul style="list-style-type: none">Only include eligible new hires on the payroll or demographic data file.If an ineligible employee becomes eligible, add them to the next payroll or demographic data file.
	<ul style="list-style-type: none">
	<ul style="list-style-type: none">

NOTE: If an employee's eligibility requires manual adjustment, Clients must coordinate with the Service Team prior to making any changes on the Plan Service Center (PSC). Manual eligibility adjustments made on the PSC without coordinating with the Service Team could result in future eligibility errors.

Generating and Posting Eligibility Reports

New Eligible reports and New Eligible Reject reports are system generated and posted to the PSC for the Client's designated Plan contact to review. Files are generated on a schedule that complements the Client's payroll cycle. Clients use these reports to:

- Identify and confirm employees who are eligible to enroll.
- Identify and resolve any address errors that could prevent employees from:
 - Being able to enroll in the Plan.
 - Receiving enrollment materials and required Plan notices as applicable.

Providing Required Notices/Enrollment Materials

If a Plan is set up with automated notices and/or enrollment materials, then the recordkeeping system produces and sends applicable materials to all employees included on the New Eligible report once the New Eligible report posts to the PSC.

NOTE: Any employees reported on the New Eligible Reject report are excluded from the automated notices and/or enrollment materials production and fulfillment process until the address errors have been corrected.

If Clients do not use automated notices and/or enrollment materials, the process for creating and sending this information to newly eligible employees varies based on Plan requirements and as outlined in the Plan's Services Agreement.

Client Experience

Eligibility files identify who is eligible in the current cycle as follows:

- New Eligible report:** May enroll in the Plan and are scheduled to receive any applicable required notices and/or enrollment materials.
- New Eligible Reject report:** May experience issues trying to enroll and will not receive any applicable required notices or enrollment materials because employee address information is incorrect.

New Eligible reports generate on a Client-approved schedule and are posted to the PSC for Client review. Empower sends an email notification to the Plan's designated contact when New Eligible reports are posted and indicates if address errors were identified on the New Eligible Reject report.

New Eligible Error Reports identify the following types of address errors:

- Missing address information where the employee address has been defaulted to the Client's address.
- Employees with an active mail hold placed on their account.

Clients are responsible for working with the Service Team to resolve any address errors reported on Eligibility Reject reports. To avoid future errors, Clients must also make address corrections in their payroll system so corrected address information is submitted on future payroll/demographic data files.

New Eligible and New Eligible Reject reports are available on the PSC for 30 days. Clients should save copies of these reports in their records in case they are needed for audit purposes.

Manual Eligibility Adjustments

Clients contact the Service Team to coordinate any manual eligibility adjustments prior to updating employee records on the PSC.

Participant Experience

Newly eligible employees (who are not reported on the New Eligible Reject report) receive applicable notices, enrollment information, and are able to enroll in the Plan as outlined in the following sections of this guide:

- Employee Enrollment
- Participant Account Access
- Automatic Enrollment, if applicable

How it Works

Description	Responsible
Submits Payroll/Demographic Data File	Client
<ul style="list-style-type: none"> • Submits payroll/demographic data file (including hire dates) needed to identify newly hired employees who are immediately eligible to participate in the Plan. • Payroll/demographic data files are typically submitted on a schedule that coincides with the Client's payroll cycle. • See Payroll Processing & Reporting section of this guide for additional information. 	
Identifies Eligible Employees and Posts New Eligible Reports	Empower
<ul style="list-style-type: none"> • Using data provided in the Plan's payroll/demographic data file, identifies newly hired employees who are eligible to participate in the Plan. • Generates New Eligible report listing newly eligible employees who will receive automated enrollment materials and applicable Plan notices. • If any employee address errors exist, also generates the New Eligible Error report listing address errors for each impacted employee. • Sends a system-generated email notification to designated Plan contacts when the reports are available on the PSC. 	
Reviews New Eligible Reports	Client
<ul style="list-style-type: none"> • Retrieves the report(s) from the PSC through the To-Do List. • Verifies employees listed on the New Eligible report are eligible and no newly eligible employee is missing or has subsequently terminated. • If the New Eligible Error report is also provided: <ul style="list-style-type: none"> – Works with the Service Team to correct any applicable address errors. – Updates payroll system with corrected address information so future payroll or demographic data files submitted to Empower do not cause additional address errors. • Contacts the Service Team to coordinate any manual eligibility adjustments prior to updating employee records on the PSC, if applicable. 	

Description	Responsible
Distributes Enrollment Information and/or Applicable Notices	Empower
<ul style="list-style-type: none"> Generates automated enrollment materials and required Plan notices as applicable and sends to newly eligible employees as listed on the New Eligible report. NOTE: Any employees reported on the New Eligible Error report are excluded from the automated Plan notices and/or enrollment materials production and fulfillment process until the address errors have been corrected. If Clients do not use automated notices and/or enrollment materials, then Clients refer to the Plan's Services Agreement for additional information. 	

Employee Enrollment

Overview

Once employees meet the Plan's eligibility requirements, they may enroll online or by contacting a Participant Services Center Representative. Eligible employees may take any one of the following enrollment actions as applicable:

Enrollment Action	Description
Quick Enrollment	If your location has not opted for an automatic enrollment feature in your participation agreement, participants may, enroll using the Plan's designated default contribution rate and default investment option.
Customize Enrollment	<ul style="list-style-type: none">Choose their contribution rates by money sources available in the Plan. See Participant Contributions section of this guide for additional information.Select their investments from the Plan's available investment options and the corresponding investment allocations.
Decline Participation	<ul style="list-style-type: none">If Automatic Enrollment applies, set their contribution rate to zero to be removed from the automatic enrollment population. See Automatic Enrollment section of this guide for additional information, if applicable.If Automatic Enrollment does not apply, no action is required to decline participation.

NOTE: Eligible employees can complete other account customization activities, like designating a beneficiary or indicating their communication preferences at their convenience.

Client Experience

Clients use eligibility reports generated by Empower to determine/identify who is newly eligible to enroll into the Plan. See Eligibility section of this guide for additional information.

Clients may use additional reports and other tools available on the Plan Service Center (PSC) to review Plan participation and other key Plan analytics. See Plan Account Access section of this guide for additional information.

Participant Experience

Empower typically sends enrollment communications to newly eligible employees, which may be standard or customized depending on Plan design and as agreed to in the services agreement.

To enroll online, eligible employees must first register their account online or complete the phone authentication process depending on their selected method of enrollment. See Participant Account Access section of this guide for additional information.

Once enrollment activities are complete, participants receive an enrollment confirmation.

How it Works

Description	Responsible
Sends Enrollment Materials	Empower
<ul style="list-style-type: none">Posts eligibility reports on PSC listing newly eligible employees.Sends applicable enrollment materials to newly eligible employees as outlined in the Plan's services agreement.NOTE: Clients must resolve employee address errors included on eligibility reports. See Eligibility section of this guide for additional information.	

Description	Responsible
Takes Enrollment Action	Participant
<ul style="list-style-type: none"> Receives enrollment communications. Enrolls into the Plan by contacting a Participant Services Center Representative or by enrolling online as outlined in the section above. Completes other account customization activities, like designating a beneficiary or indicating a communication preference. 	
Sends Enrollment Confirmations	Empower
<ul style="list-style-type: none"> Prepares and sends enrollment confirmations to newly enrolled participants. Enrollment confirmations may be sent electronically or by mail depending on Plan and participant designated communication preferences. 	
Reports Contribution Elections	Empower
<ul style="list-style-type: none"> Collects all contribution rate elections for newly enrolled participants. Sends a Deferral Feedback report to the Client, notifying the Client to begin participant payroll deductions. See Participant Contributions section of this guide for additional information. NOTE: Newly eligible participant investment elections and allocations are systematically updated in Empower's recordkeeping system. 	
Begins Payroll Deductions	Client
<ul style="list-style-type: none"> Reviews Deferral Feedback report. Updates payroll records with participant deferral elections. Begins payroll deductions on the next payroll cycle. Sends contributions on the next payroll file. 	

Beneficiary Recordkeeping

Overview

Participants may designate the following types of beneficiaries to receive their retirement Plan assets once they become deceased:

- **Primary:** Identifies the primary recipient of the participant's assets.
- **Contingent:** Identifies who should receive the participant's assets if the primary beneficiary dies before payment of the participant's death benefit.

Participants may designate any individual or entity as primary and/or contingent beneficiary.

- Participants must provide the Tax Identification Number (TIN) or Social Security Number (SSN) for a designated beneficiary.
- If participants wish to add a Non-U.S. beneficiary without a SSN/TIN, a Beneficiary Designation form is required.
- **NOTE:** Non-U.S. citizen beneficiaries must obtain an SSN/TIN to submit a claim. See Death Claim Processing section of this guide for additional information.

Participants may request to change or revoke a beneficiary designation at any time. When a new designation is received in good order, it supersedes the prior beneficiary designation.

Married participants are generally required to designate their spouse as primary beneficiary under the terms of the Plan unless the spouse provides notarized consent allowing the participant to designate someone other than their spouse as primary beneficiary.

When Beneficiary Recordkeeping services are active, Empower accepts and maintains beneficiary designations from participants when received in good order without the Client's further approval.

Client Experience

In the event Empower has not received a beneficiary designation in good order, or if there is a conflict, the Client determines the appropriate beneficiary designation.

Clients can review participant beneficiary information via the following Plan Service Center (PSC) tools:

- Run a Participant Beneficiary Detail report.
- Review an individual participant's account through the Employee web emulator.

Participant Experience

Participants may view their beneficiary designation online, and beneficiary information may also be included on account statements.

Participants may add or change beneficiary designations online unless the Plan requires married participants to obtain spousal consent before allowing the participant to designate someone other than their spouse as primary beneficiary. When spousal consent applies, the participant must submit a Beneficiary Designation form, including notarized spousal consent. The Plan's Beneficiary Designation form is available online or by contacting a Participant Service Center Representative.

To change designations, participants must provide the following beneficiary information:

- Name and Social Security Number (SSN)
- Relationship to participant
- Benefit percentage allocated to each beneficiary

NOTE: Additional beneficiary information may be required depending on individual Plan design.

When a beneficiary change is complete, participants receive a beneficiary change confirmation.

QJSA Exception

Participants subject to QJSA (and therefore QPSA) may change beneficiaries online so long as their beneficiary changes meet the Plan's beneficiary spousal consent requirements and QPSA notice services are active. Otherwise, additional required QPSA notice and waiver requirements apply, and changes must be submitted via a Beneficiary Designation form.

How it Works

Description	Responsible
Submits Beneficiary Change Request	Participant
<ul style="list-style-type: none">Participants may submit beneficiary changes online if spousal consent requirements do not apply.If spousal consent requirements apply, then participants must submit a Beneficiary Designation form, including notarized spousal consent, according to the directions provided on the form.	
Reviews Beneficiary Change Request	Empower
<ul style="list-style-type: none">When a Beneficiary Designation form is submitted, reviews request to ensure received in good order.When beneficiary spousal consent applies:<ul style="list-style-type: none">Reviews the Spousal Consent section of the Beneficiary Designation form, to verify notary requirements have been met.If any information is missing or questionable, sends an email to the participant with a request to contact Empower to resolve the issue.If Empower does not have an email address on file for the participant, sends a letter to the participant's address of record explaining why the request is considered not in good order.	
Processes and Confirms Beneficiary Change Request	Empower
<ul style="list-style-type: none">NOTE: Online submissions systematically update Empower's recordkeeping system.When a Beneficiary Designation form is submitted in good order, Empower updates the recordkeeping system as soon as administratively feasible.Sends beneficiary change confirmations to participants depending on the Plan and participant designated communication preference.	

Managing Participant Bank Account Information

Overview

Participants can add and remove banking information for up to eight bank accounts to their personal profile through the following access channels:

- Over the phone by contacting a Participant Service Representative.
- Accessing the Manage Bank Accounts page from the participant's online account.

Participants must provide the following financial institution information to add new banking instructions:

- Account Type (Checking or Savings)
- Bank Routing Number
- Bank Account Number

NOTE: Automated Clearing House (ACH) credit or debit can only be made to or from an account of a United States financial institution. Banking account information is verified through GIACT, a consumer reporting agency that specializes in identifying and authenticating banking account information using real-time response technology.

Once banking information is entered or updated, the participant must agree to the ACH Authorization Agreement.

The following details the different verification responses received from GIACT and the corresponding impact to transactions.

Response Example	Description
Fully Verified Authentication	<ul style="list-style-type: none">• Name, routing number and account number all match.• Bank account is immediately available for transactions:<ul style="list-style-type: none">– Loan payment– Loan payoffs– Withdrawals– New loan proceeds• Participants may add bank information and request a loan or withdrawal during the same call or online session.• NOTE: Transactions require standard processing time and waiting periods prior to release of funds for delivery.
Partially Verified Authentication	<ul style="list-style-type: none">• Typically occurs when the bank:<ul style="list-style-type: none">– Is a non-participating bank in the GIACT network.– Is a regional bank or credit union.– The account was opened within the last 60 days.• The bank account number/routing number is verified but not name associated with bank account cannot be verified.• The bank account is immediately available for use for a money-in transaction, such as a loan payment or payment or loan payoff, if allowed by the plan.• After a 15 day hold period, the bank account is available for disbursement transactions such as, withdrawals and new loans.

Response Example	Description
Failure in Verification	<ul style="list-style-type: none"> • Name on the account did not match. • The routing number or account number account did not match. • Bank account is not a checking nor savings account. • As a result of failure, the bank account is not added to the participant's online account. • NOTE: If the response fails due to name mismatch, Empower reviews the participant's account for minor differences. For example, a middle initial or suffix in the name then resubmits the banking information to GIACT for verification.

GIACT bank verification status may be viewed online or communicated by a Participant Services Representative. All proceeds are distributed via check until the participant's banking information has been successfully added and validated by the corresponding financial institution.

Participants receive security alerts via text and email when banking information has been added or removed. Bank accounts cannot be edited once added. The account must be removed/deleted and added again with the edited information.

The plan follows the ACH Authorization Agreement for the applicable terms and conditions that apply to participant bank account set up and administration. After adding the bank account to a participant's account, Empower re-verifies the bank account prior to processing a disbursement transaction if the account has not been verified previously within 180 days of the requested transaction.

Automatic Enrollment

Overview

For locations with an Automatic Enrollment provision, eligible employees who do not decline participation or make affirmative enrollment elections are automatically enrolled into the Plan:

- At the location's default employee contribution rate or percentage.
- Into the Plan's default investment option.

Generally, newly eligible employees must be notified at least 30 (but no more than 90) days in advance of their automatic enrollment entry date to allow employees to opt-out of the Automatic Enrollment process.

When the Plan's Automatic Enrollment provisions include either of the following, these additional details must be included in initial notices as applicable:

- Annual automatic contribution increase schedule up to maximum deferral percentage.
- Permissible withdrawal period or period of time after a participant is automatically enrolled when they can cancel participation and request a withdrawal of any contributions deposited as a result of being automatically enrolled.

Automatically enrolled participants must also receive annual notifications informing them of the applicable Automatic Enrollment provisions, including scheduled increase details as applicable.

Initial Notices

When Empower provides initial automatic enrollment notice services, initial Automatic Contribution Arrangement (ACA) notices are distributed to the newly eligible employees a minimum of 30 days in advance of their automatic enrollment entry date and include the following information as defined by the Plan:

- Plan's default contribution rate and default investment option.
- Automatic enrollment entry date (the first payroll date when the default contribution rate becomes effective).
- Permissible withdrawal period information.
- Annual automatic increase details.

Annual Notices

When Empower provides annual ACA notice services, annual notices are distributed to the automatic enrollment population prior to the beginning of each Plan year and include the following information as defined by the Plan:

- Current participant contribution rate (either Plan's default or current rate after having gone through one or more annual automatic increase cycles).
- Current investment (either Plan's default or current participant election(s) and allocations)
- Annual automatic increase rate and scheduled effective date.

Deferral Feedback

Empower uses Deferral Feedback reports to notify Clients when to begin or change payroll deductions as a result of automatic enrollment.

Deferral Feedback reports are scheduled to coincide with a Client's payroll frequency and to allow an administratively feasible amount of time for Clients to update contribution elections in their payroll system (or through their payroll provider) and report back on the next scheduled payroll file.

Additional Considerations

Eligible Compensation

Clients are responsible for withholding the Plan's default contribution rate on behalf of automatically enrolled participants based on all sources of eligible compensation (e.g., regular pay, bonus, etc.) as defined in the Plan document. For purposes of administering the Plan's automatic contribution arrangement, Empower reports the applicable Plan default contribution rates for automatically enrolled participants on all sources of compensation reflected on the recordkeeping system.

If the Client administers separate contribution rate elections by compensation source (e.g., regular pay, bonus, etc.), Clients must notify Empower when the definition of eligible compensation changes so all sources of compensation reflected on the recordkeeping system match Plan document definitions.

Eligible Population

Re-enrollment Solicitation

When establishing or changing automatic enrollment provisions on Empower's recordkeeping system, Clients may choose to automatically enroll all eligible employees with a combined (Pretax and Roth, including age catch-up) contribution rate that is less than the Plan's automatic enrollment default contribution rate (and newly eligible employees going forward).

However, Empower will not automatically re-solicit and enroll employees with contribution rates less than the Plan's automatic enrollment default contribution rate on any kind of defined frequency after the automatic enrollment provisions have been established or updated on the recordkeeping system.

Empower will accommodate up to one re-enrollment solicitation request annually but requires written direction from the Client (in the form of an Automatic Enrollment Services Election Form) to do so. See the Automatic Enrollment Services Election Form for additional details.

Re-hires/Re-instatements

The following outlines how Empower processes automatic enrollment provisions for employees who have been terminated and re-hired:

- Participants will be auto enrolled upon rehire unless the Client directs otherwise in a separate election (removing this option is not available for QACA Safe Harbor Plans).
- Participants who were considered auto enrolled at the time of their termination will be reinstated upon rehire if rehired within one full Plan year, unless the Client directs otherwise in a separate Plan provision election (removing this option is not available for QACA Safe Harbor Plans).

See the Automatic Enrollment Services Election Form for additional details

Client Experience

Empower identifies all employees who are to be automatically enrolled at the Plan's default contribution rate or automatically increased on the next scheduled Deferral Feedback file. Clients use this report to make the necessary payroll adjustments needed in order to begin or change participant payroll deductions.

The Deferral Feedback report identifies all types of deferral rate changes including participants who make an affirmative contribution rate election for the applicable payroll date. See Participant Contributions section of this guide for additional information.

Participant Experience

Newly eligible employees receive an initial notice indicating they will be automatically enrolled into the Plan at the Plan's default options. Employees can then take one of the following actions to be removed from the Automatic Enrollment process as outlined in the Employee Enrollment section of this guide:

- Use Quick Enrollment feature if set up for the Plan
- Customize Enrollment
- Decline Participation

Employees who do not take any action are automatically enrolled into the Plan once the opt-out period expires.

When the Plan's Automatic Enrollment provisions include permissible withdrawals, employees may:

- Decline participation before the end of the permissible withdrawal period.
- Request a withdrawal of contributions deposited during that period.

When Empower provides annual ACA notice services, the automatic enrollment population of participants receive annual notices prior to the beginning of each Plan year, which include automatic increase details as applicable.

To avoid automatically increasing their contributions, participants change their contribution rate prior to the scheduled increase date. Participants who take no action have their contributions automatically increased on the scheduled increase date.

NOTE: If participants ever make a change to their contribution rate, they are removed from the automatic enrollment population and are no longer subject to automatic increases.

How it Works

Description	Responsible
Sends Initial ACA Notices	Empower
<ul style="list-style-type: none">• Prepares and sends initial ACA notices to newly eligible participants at least 30 days in advance of their automatic enrollment entry date.• Notices may be sent electronically or via mail to participant's address of record depending on Plan and participant communication preferences.	
Receives Initial Notice	Employee
<ul style="list-style-type: none">• Receives initial notice and takes action by the opt-out date as described above.• Employees who take no action are automatically enrolled in the Plan once the opt-out period expires.	
Reports Contribution Elections	Empower
<ul style="list-style-type: none">• Collects all defaulted contribution rates for automatically enrolled participants.• Collects all contribution elections for participants who actively enrolled using custom options or Quick Enroll.• Reports on the next scheduled Deferral Feedback report notifying the Client to begin participant payroll deductions.	

Description	Responsible
Begins Payroll Deductions	Client
<ul style="list-style-type: none"> • Reviews Deferral Feedback report. • Updates records with participant contribution rates. • Begins payroll deductions on next payroll cycle. • Reports contribution amounts on next payroll file. 	
Requests Withdrawal of Contributions (Permissible Withdrawal)	Participant
<ul style="list-style-type: none"> • For Plans with permissible withdrawal, participants may cancel participation in the Plan and request a withdrawal of any contributions made within the permissible withdrawal period before the period expires. • Permissible Withdrawal Request Forms are available for participants to download online. • Empower processes permissible withdrawal requests received in good order and within the allotted period as requests are received. 	
Sends Annual ACA Notices	Empower
<ul style="list-style-type: none"> • Prepares and sends annual ACA notices to automatically enrolled participants. • Notices may be sent electronically or via mail to participant's address of record depending on Plan and participant communication preferences. 	
Receives Annual Notice	Participant
<ul style="list-style-type: none"> • Receives annual notice and takes action by the scheduled increase effective date as described above. • Participants who take no action are automatically increased on the scheduled increase date. 	
Reports Contribution Elections & Scheduled Increases	Empower
<ul style="list-style-type: none"> • For participants who do not make a contribution rate change, automatic increases are reported on the next scheduled Deferral Feedback report based on the automatic increase effective date. • For participants who make a contribution change prior to the automatic increase effective date, custom elections are reported on the next scheduled Deferral Feedback report. 	
Updates Payroll Deductions	Client
<ul style="list-style-type: none"> • Reviews Deferral Feedback report. • Updates records with participant contribution increases or changes. • Begins payroll deductions on next payroll cycle. • Reports contribution amounts on next payroll file. 	

Participant Contributions

Overview

Clients can view the following types of participant deferral information on the plan provision pages of the Plan Service Center (PSC) website as applicable to the plan:

- Plan and participant contribution money sources allowed
- Minimum and maximum percentage/dollars allowed by source
- Whether catch-up contributions are combined with allowed deferrals or are treated as a separate contribution type
- Rates and increments allowed for changes
- Automatic enrollment status and default enrollment rate
- Automatic increase amount and maximum

Participant Experience

Participants can change their deferral elections using one of the following methods:

- **Online:** access online account
- **By phone:** by speaking to a Participant Service Center Representative or via the automated phone menu

When changing deferral elections, and if the plan allows, participants have the following options:

- Schedule for a future date
- Schedule an annual automatic increase

When participant-level or plan-related annual automatic increases apply, participants may opt-out of the scheduled increase by changing their deferral election prior to the scheduled increase date.

Notifications

Participants receive the following deferral change notifications as applicable:

- Confirmation of deferral change
- Advance notice of plan-directed scheduled increase

Notices may be sent electronically or mailed to the participant's address of record depending on plan and participant communication preference elections.

How it Works

Description	Responsible
Identifies Contribution Changes and Confirms Changes	Empower
<ul style="list-style-type: none">• Receives participant-directed deferral change information via the participant access channels noted above, including participant scheduled annual automatic increases, or future-dated deferral increases.• Sends deferral change confirmations to participants.• Identifies scheduled annual automatic increases as directed by the plan.• Sends advance notice of plan-directed scheduled increases to participants.• NOTE: Participant confirmations and notices are sent to participants depending on the plan and participant designated confirmation communication preference.	

Description	Responsible
Reports Contribution Changes	Empower
<ul style="list-style-type: none"> • Reports participant contribution changes on the next scheduled Deferral Feedback file, notifying the Client to change participant payroll deductions. • Scheduled annual automatic increases are reported on the Deferral Feedback file closest to the payroll cycle in which they are scheduled to go into effect. • Future-dated deferral changes elected by participants are reported on the Deferral Feedback file closest to the payroll cycle in which they are scheduled to go into effect. 	
Adjust Payroll Deductions	Client
<ul style="list-style-type: none"> • Review Deferral Feedback file. • Update records with participant deferral changes. • Adjust payroll deductions on next payroll cycle. • Report contributions on next payroll file. 	

Payroll Processing and Reporting (Self Service)

Overview

Payroll files are used as a vehicle for Clients to provide plan contribution, loan payment, compensation, and employee demographic data to Empower electronically.

Payroll files are submitted on a frequency coinciding with the employer's payroll cycle. The plan can have more than one payroll file and submit different files on different frequencies. For example, *weekly* for Payroll Center 1 and *semi-monthly* for Payroll Center 2.

Payroll File Data

To process retirement plan contributions, Clients are required to:

- Create a payroll file containing employee information and contribution data.
- If a payroll file cannot be provided, submit contributions through the Guided Payroll feature available on the Plan Service Center website (PSC).
- Authorize Empower to debit total contribution dollars from the location's bank account.

Payroll files must provide the following general information for each employee or Participant:

Data Type	Description
Demographic Data	Social Security Number (SSN), name, complete address, birth date, gender, marital status, email address, phone number, salary information, etc.
Employment Dates	Hire date, termination date, rehire date.
Contribution Information	Employee contributions by money source, employer contributions by money source, loan repayments
Additional Data	<ul style="list-style-type: none">• Common additional data requirements include Year-to-date hours worked and compensation information,• Other additional data requirements vary based on recordkeeping services provided for the plan.

How it Works

Description	Responsible
Prepare Payroll File	Client or Payroll Provider
<ul style="list-style-type: none">• Update payroll file data with each payroll cycle.• General updates required for most payroll files include:<ul style="list-style-type: none">– New Employee Information: For newly hired employees who have never worked for the company before, add all demographic data and hire date to the payroll file.– Terminated Employee Information: Update the termination date for any employee who terminated during the pay period and keep record on the payroll file for the remainder of the plan year.– Contribution Information: Update each Participant's contribution amounts by contribution type for the pay period, which may include: Employee before-tax contribution, Employee after-tax contribution, Employer contribution, Loan repayment, and/or Employee Roth contributions.	
Create and Transmit Payroll File	Client or Payroll Provider
<ul style="list-style-type: none">• Create a payroll file in agreed upon format and uploads via the PSC.• NOTE: If using a payroll provider and Payroll Bridge services, the payroll provider transmits the payroll file to Empower via a secure File Transfer Protocol (FTP).	

Description	Responsible
Correct Error & Warnings	Client
<ul style="list-style-type: none"> Once data is received, the PSC file checking process sends notification to the payroll contact listing all errors and warnings. The file checking process makes the following distinction between errors and warnings: <ul style="list-style-type: none"> Error Messages: Identify missing or potentially inaccurate data that could cause significant processing errors if not verified or corrected. Warning Messages: Identify missing information that does not impact processing but may cause errors with other services. Correct all employee data and participant data errors. Acknowledge or correct all warnings then proceed with contribution processing. Service Team is available to assist the Client to correct any errors, warnings, or variances that must addressed prior to processing and funding. 	
Process Contributions	Client
<ul style="list-style-type: none"> Verify that contribution total matches the employer's totals in their payroll system. Review participant contribution data to determine if other records within the file requires adjustment or rejection. Some common examples of adjustments and reasons to reject a file include: <ul style="list-style-type: none"> Negative contributions received on zero balance accounts. Loan payments for a loan that is paid off or defaulted. Employer contributions that exceed the allowed maximum annual employer contribution amount. Employee contributions that exceed the allowed annual employee or employee catch up contribution amount. Identify and debit any forfeiture funds are to be used to fund employer contributions, if applicable. Authorize Empower to debit the bank account on file. NOTE: Contribution processing may be cancelled once scheduled. When needed, cancel contribution processing no later than 11:59 p.m. Mountain Time the day before the scheduled effective date. 	
Completes Deposit	Empower
<ul style="list-style-type: none"> Electronically debits total contribution amount from the employer's bank account on file on the second business day after the scheduled effective date. Systematically deposits contributions into participant retirement accounts on the next business day after the scheduled effective date. Provides a transaction receipt to the Plan Administrator confirming the successful completion of contribution processing. Posts a payroll file data error report to the PSC if payroll file data errors are identified during the submission process. 	
Complete Follow up Tasks	Client
<ul style="list-style-type: none"> Retain a copy of the transaction receipt with other plan records for research and audit purposes. Retrieve and review the payroll error report and corrects errors as applicable. Correct all payroll file data errors on the next payroll file to prevent future errors. NOTE: Some data errors may be corrected on the PSC. 	

Incoming Rollover Processing

Overview

When allowed by plan provisions, participants may move (rollover) assets from a qualified retirement plan or Individual Retirement Account (IRA) into the plan administered by Empower.

When a rollover eligible employee rolls assets into the plan, the assets maintain their tax-deferred status and are generally invested in the plan per the participant's direction.

A rollover from a qualified plan is considered a plan distribution and can only take place after the employee has a severance from employment or, if still employed, is eligible for an In-Service Withdrawal from the plan.

For purposes of this section, the plan receiving the rollover is referred to as the 'receiving plan' while the plan or IRA from which rollovers are occurring is referred to as the 'originating plan, prior plan, or IRA'.

When rollover contributions are allowed by the receiving plan, incoming assets must:

- Be the type of assets eligible for rollover. Required Minimum Distributions (RMD) are not eligible to be rolled over.
- Come from a qualified plan or an IRA as allowed by the receiving plan.
- Unless an exception exists, indirect rollover assets must generally be deposited into the receiving plan no later than 60 days after the participant receives the assets from the originating plan or IRA.

Types of Rollovers

Rollover Type	Description
Direct Rollovers	<ul style="list-style-type: none">• Proceeds are sent either directly to the participant or to the receiving institution and made payable to the receiving institution for the benefit of (FBO) the participant.• Is not considered a taxable event and no taxes are withheld from the transfer amount.• Additional information is required for Roth designated rollovers from other qualified plans including the date of the first Roth contribution date and cost basis (non-taxable assets).

Rollover Type	Description
Indirect Rollovers (60-day rollover)	<ul style="list-style-type: none"> • Proceeds are sent directly to the participant and made payable to the participant. • Is generally assumed at the time of distribution to be a taxable event and applicable taxes are withheld from the transfer amount. • NOTE: Participants must generally add additional available assets to the rollover to deposit the full original rollover amount otherwise the missing amount from the transfer results in a taxable distribution. • Assets must generally be deposited into the receiving plan no later than 60 days after the Participant receives the assets from the originating plan or IRA. • If an exception exists to the 60-day rollover deadline, the participant identifies the exception on the Incoming Rollover/Transfer form. • Empower accepts the contribution if the individual has a waiver from the IRS or certifies to the 60-day rollover exception. • A rollover of amounts treated as a participant loan offset from the originating plan must be executed by the participant's tax filing deadline for the tax year of the loan offset. Empower accepts the contribution if the individual certifies as to the rollover requirements and includes documentation as to the loan offset. Alternatively, the loan offset can be certified by the prior plan administrator.

Allowable Rollover Transactions

Participants may be allowed to originate a rollover transaction from the following types of retirement plans as allowed to be rolled over by the receiving plan:

- 403(b)
- Government 457(b)
- Designated Roth Account (401(k), 403(b), or Government 457(b))
- Qualified Plan (e.g., profit-sharing, 401(k), money purchase, and defined benefit plans)
- SARSEP IRA
- SEP-IRA (Simplified Employee Pension)
- SIMPLE IRA (Savings Incentive Match Plan for Employees)
- Traditional IRA

Service providers servicing the originating plans, prior plans, or IRAs have their own procedures for rollovers in addition to both the originating and receiving plan's distribution and rollover contribution provisions. Participants must satisfy all requirements for the service providers servicing the originating plan and receiving plan. Additional information and a rollover chart are available at www.irs.gov.

402(g) Limit

Assets rolled into the plan do not count towards the IRS Code section 402(g) Annual Contribution limit. For more information about contribution limits see the following sections of this guide:

- Payroll Processing and Reporting
- Compliance Services sections of the guide

Participant Experience

Participants may initiate an incoming rollover via the following channels:

Request Channel	Description
Incoming Rollover/Transfer Form	<ul style="list-style-type: none">• Participants download the form from their online account, completes, signs, and submits to Empower as directed on the form along with any required documentation and the incoming rollover contribution check, if issued to the participant.• Certifies on the form that the assets are eligible for a rollover into the receiving plan.• Incoming rollover requests typically require prior plan certification or additional supporting documentation.• For Indirect Rollovers, participants must provide proof that the assets were distributed in the last 60 days from a qualified retirement plan.• Empower reviews the participant's rollover form and related backup documentation for completeness and investment instructions prior to processing.
Participant Service Center Representative Paperless Direct Rollover	<ul style="list-style-type: none">• Participants contact a Participant Service Center Representative who can assist with completing their incoming rollover request.• Participants can also submit a request to have a dedicated representative call at a convenient time to help move other eligible retirement accounts into their current plan.• Participant Service Center Representative incoming rollover assistance includes the following as applicable:<ul style="list-style-type: none">– Collect required rollover information from the participant.– Call the originating institution with the participant to get additional required information.– Enter all required information directly into the recordkeeping system for processing.• NOTE: Assets are invested into the participant's account as instructed via a recorded phone line, including the option to invest based on the participant's current investment allocations on file.

NOTE: In the event that a participant does not elect investment options on the Incoming Rollover/Transfer form but otherwise completes the form, the money is invested according to the participant's on-going investment elections, and if none are elected, then in the default investment option under the plan at the time the incoming rollover is received.

Good Order Requirements

All paper and paperless incoming rollover requests must meet all rollover eligible plan requirements and also be considered in good order prior to depositing rollover assets into the plan. A good order request must include the following:

- All requested participant information and supporting documentation, as applicable.
- Relate to a valid rollover within the meaning of Treasury Regulation Section 1.402(c)-2, Q&A-1 or as a rollover contribution within the meaning of Internal Revenue Code ("Code") Section 408(d)(3) and that satisfies the requirements of Code Sections 401(a)(31), 402(c), or 408(d)(3) for treatment as a rollover or a rollover contribution
- Identification of the prior qualified plan or IRA from which the funds originate
- Participant's certification
- Prior plan administrator representative/prior plan trustee certification, or appropriate documentation, as applicable

NOTE: If Empower needs additional information from the participant to validate the potential rollover, Empower initiates multiple attempts to contact the participant by telephone and/or in writing.

Requests that are not in good order and which cannot be resolved in accordance with Empower's processing timeframes are rejected, but the participant may provide the missing information and resubmit the request. If the Client separately concludes that the rollover contribution request is valid, the Client shall instruct Empower to accept the rollover into the participant's account.

Empower reviews any required documentation or verifies the required information. Provided that the request has not been rejected following the review, Empower reasonably concludes that the rollover contribution request is a valid rollover contribution and accepts the rollover into the participant's plan account in accordance with the instructions specified on the request form or by the participant.

Paper Rollovers

Distribution proceeds may be delivered with the completed request form via a check (with accompanying check stub information) issued from the trustee/custodian of the prior plan or IRA, as applicable, and made payable to the plan for the benefit of the participant.

The participant provides the most recent Account Statement or Final Distribution Statement from the prior plan or IRA, as applicable, including a reference to the prior plan name and applicable Code qualification section (e.g., 401(k) or 401(a) plan, 403(b) plan, governmental 457(b) plan, etc.) or a reference that the IRA is titled in the participant's name as a non-inherited IRA (e.g., a traditional IRA under Code Section 408), and, if applicable, Roth first contribution date and Roth contribution amount. Alternatively, this information may be reflected on the check stub accompanying the rollover proceeds.

If the documentation above is incomplete, with respect to rollovers originating from a prior plan, Empower requires a certification on the request form from an authorized representative of the prior plan administrator or a prior plan trustee/custodian regarding the eligibility of the rollover under the requirements of the Code. Additionally, a Service Team Representative may contact the prior plan or IRA's service provider to verify the required information.

As an additional confirmation measure, Empower may also review the check and check stub. If the trustee/custodian or administrator of the prior plan or the IRA, as applicable, issued the check payable to the plan for the benefit of the participant, Empower reasonably concludes that the prior plan administrator or IRA custodian treated the distribution as an eligible rollover distribution.

For Indirect Rollovers

If a distribution from an IRA or a retirement plan is paid directly to the participant, the participant may endorse and submit the check (with the distribution check stub) or submit a bank check up to the full amount of the distribution along with a completed request form.

Empower rejects a rollover contribution request if the date of the distribution check is more than 60 days from the requested rollover processing date, unless an exception exists. Empower will accept the participant's self-certification and processes the rollover contribution into the participant's plan account provided the request is otherwise deemed to be in good order.

Empower accepts an indirect rollover of a loan offset amount, if the participant self-certifies all of the following:

- The indirect rollover reflects the amount of a loan offset at the time the participant's account was distributed from the prior plan.
- The indirect rollover was completed prior to the participant's tax filing deadline for the tax year in which the loan was offset.

The participant must also provide written documentation from the prior plan administrator or provider which reflects the loan offset, such as, an account statement, final distribution confirmation or letter from the prior plan administrator.

How it Works

Description	Responsible
Initiate Paper Rollover	Participant
<ul style="list-style-type: none"> Download, complete, sign, and submit the Incoming Rollover/Transfer form as directed on the form along with any required documentation and the incoming rollover contribution check, if issued to the participant. Certify on the form that the assets are eligible for a rollover into the receiving plan or provide appropriate documentation. Provide any additional documentation required. For example, a copy of the participant's most recent originating plan or IRA participant statement. Complete, sign, and submit the Incoming Rollover/Transfer form to Empower along with the incoming rollover contribution check – or in the case of an indirect rollover, may submit a bank check up to the full amount of the distribution – and additional paperwork, if applicable according to the instructions provided on the form. NOTE: For indirect rollovers, participants must provide proof – such as the issuance date of the check – that the assets were distributed in the last 60 days from a qualified retirement plan. 	
Reviews and Processes Request	Empower
<ul style="list-style-type: none"> Reviews the participant's rollover form and any related paperwork. If not received in good order, contacts the participant. If needed, initiates a call with the participant and originating institution to obtain necessary information. Approves the request and submit for processing. Upon receipt, processes rollover proceeds according to the participant's direction. NOTE: Additional information is required for Roth-designated rollovers from other qualified plans including the date of the first Roth contribution and cost basis (non-taxable assets). If this information is missing, the Service Team contacts the originating plan or IRA provider. 	
Confirms Request	Empower
<ul style="list-style-type: none"> Distributes letter to the participant confirming that the incoming rollover assets were deposited into their account. Incoming rollovers are listed under the participant's transaction history on the participant online account and are reflected on participant statements. 	
Provide Appropriate Tax Forms	Originating Plan or IRA Provider
Appropriate tax forms are issued from the originating plan or IRA provider in the year following the year of the rollover.	

Paperless Direct Rollovers

Empower identifies participant s that may wish to contribute a rollover eligible distribution from a prior plan or IRA through the following channels:

- Inquiries from participants submitted online.
- Enrollment meetings or assistance.
- Discussions between the participant and Participant Service Center Representatives.
- Other administrative forms submitted by participants to Empower for processing.

Empower may contact such participants and, if a participant informs Empower of their affirmative election to proceed with a rollover request, the representative:

- Reviews the roll-in process with the participant on a recorded line.
- Obtains the participant's investment instructions for the rollover proceeds on the recorded line.

The representative may contact the prior plan administrator/IRA custodian or its service provider, as applicable, at the participant's request and with the participant on a recorded line to initiate a disbursement of the rollover proceeds.

The representative may assist the participant with completing all of the following tasks:

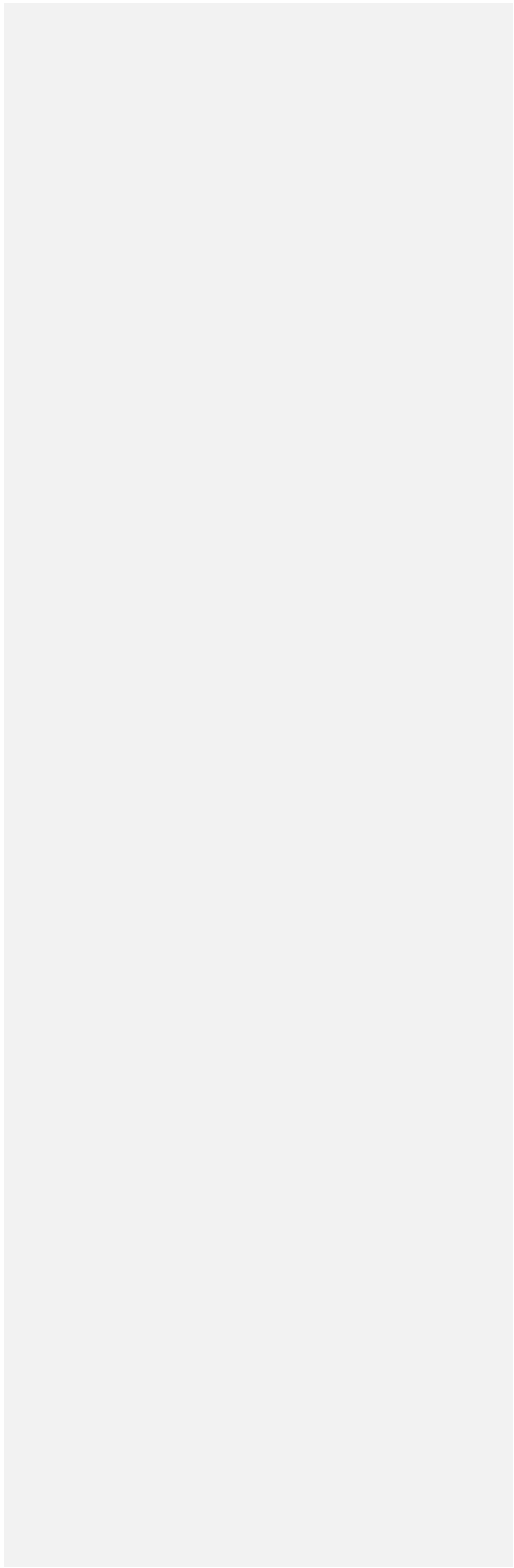
- The prior plan or IRA service provider's distribution paperwork as needed.
- Verify information about the prior plan/IRA during the discussion with the prior service provider to confirm the distribution proceeds are eligible to be rolled over into the plan.
- Obtain a recent Account Statement or Final Distribution Confirmation from the prior plan or IRA, as applicable.
- Roth first contribution date and Roth contribution amount, when applicable. Alternatively, this information may be reflected on the check stub accompanying the rollover proceeds.

The representative monitors the arrival of the incoming rollover proceeds and may follow-up with the prior plan or IRA service provider as needed.

Upon receipt of the rollover proceeds, a Service Team Representative reviews the check to confirm it has been issued to the plan for the benefit of the participant and reviews the distribution sources reported on the check stub for the purpose of confirming that the distribution reflects funds that are eligible for rollover. Upon confirmation, the Service Team reasonably concludes that the prior plan administrator or IRA custodian, as applicable, treated the distribution as an eligible rollover distribution to be directly rolled over by the participant.

How it Works

Description	Responsible
Initiate Paperless Rollover	Participant
<ul style="list-style-type: none"> • Contact the Participant Service Center to initiate the rollover request. • Alternatively, submit a request online for a representative to contact the participant to assist with a rollover request. • Participate with the representative in a call to provide available rollover information. • Provide investment instructions for rollover proceeds. • For Indirect Rollovers, provide proof that the assets were distributed in the last 60 days from a qualified retirement plan. 	
Reviews and Processes Request	Empower
<ul style="list-style-type: none"> • With the participant, contacts the originating institution to get necessary information. • Once all necessary information has been captured, the Service Team Representative submits the request directly into Empower's recordkeeping system. • Upon receipt, processes rollover proceeds according to the participant's direction. • NOTE: Additional information is required for Roth-designated rollovers from other qualified plans including the date of the first Roth contribution and cost basis (non-taxable assets). If this information is missing, the Service Team contacts the originating plan or IRA provider. 	
Confirms Request	Empower
<ul style="list-style-type: none"> • Distributes letter to the participant confirming that the incoming rollover assets were deposited into their account. • Incoming rollovers are listed under the participant's transaction history online and are reflected on participant statements. 	
Provide Appropriate Tax Forms	Originating Plan or IRA Provider
Appropriate tax forms are issued from the originating plan or IRA provider in the year following the year of the rollover.	



Plan Investment Options

Overview

Based on their independent evaluation, the UUA Retirement and Finance Committees select investment options into which plan participants may invest contributions.

Certain investment option services are provided by Empower and may be subject to certain limitations or conditions. Empower (or its affiliates) may receive fees from mutual fund families or other investment option sponsors (or their affiliates) for providing certain administrative or other services. Clients may refer to their Plan Fee Disclosure for additional information regarding these fees. See Plan and Participant Fee Disclosures section of this guide for additional information.

Qualified Default Investment Alternative

A Qualified Default Investment Alternative (QDIA) is a type of default investment that the U.S. Department of Labor (DOL) has determined is appropriate for meeting a participant's needs for long-term retirement investing. Guidelines issued by the DOL lay out the specific criteria for which investments qualify as a QDIA and Clients seeking fiduciary protection offered under the Employee Retirement Income Security Act (ERISA) must adhere to the following additional requirements:

- Must not hold or permit the acquisition of employer securities except in very limited circumstances.
- Must permit the participant to transfer out to another investment without penalty.
- Managed by an 'investment manager', a plan trustee meeting specified requirements, or the plan sponsor who is a "named fiduciary" under ERISA.
- Investments options are mutual funds.
- Mutual funds must be diversified to minimize the risk of large losses.
- Mutual funds must provide varying degrees of long-term appreciation and capital preservation through a mix of equity and fixed income exposures.

Clients are responsible for ensuring that the default investment meets the conditions of a QDIA. When QDIA applies, initial and annual notifications to participants are also required.

Earnings

When applicable, dividends, capital gain distributions, interest, or other earnings paid by an investment option within the plan are reinvested in that same investment option unless directed otherwise by the Client.

Changes to a Plan's Investment Lineup

The plan's investment lineup can generally be changed at any time and are subject to applicable notice requirements as outlined under the Participant Experience section below.

If a change to the lineup is required because an existing investment option is no longer available, Empower notifies the Client as soon as administratively feasible after the investment option sponsor notifies Empower.

The desired replacement investment option must be from a fund company that currently has, or will enter into, a trading agreement with Empower.

If the Client determines that changes to the existing investment lineup are needed, advance written notice to Empower is required:

- To process the request including the transfer of assets and investment elections from the prior investment option to the new investment option.

- To help ensure required communications are sent to participants, beneficiaries, and alternate payees in the plan.

Empower processes investment changes in accordance with customary processing standards, subject to any limitations imposed by the available investment options under the plan or by third parties representing the investment options ("Investment Option Sponsor(s)"), and in accordance with the investment directions of the Client, which may include direction to invest in accordance with participant directions. Empower passes to the plan trustee or custodian directions to execute the corresponding transactions involving the assets of the plan's trust.

Generally, changes to a plan's lineup are completed no less than 60 days from the date on which Empower receives final, Client-approved investment change information and documentation. Empower proactively reviews plan pricing because changes to the plan's investment lineup may impact the plan's pricing structure.

Participant Investment Changes

In general, participants should be reviewing their investment strategy at least annually to help ensure it is still appropriate for their retirement goals and, if deemed necessary by the participant, make changes to their investment strategy.

Generally, participants may make changes to their investments within the plan at any time. Depending on plan provisions, available changes may include the ability to:

- Rebalance their current balance
- Change how their future contributions are invested
- Change how their current balance is invested

Limitations, Availability, Fees, and Restrictions

Generally, fund-to-fund transfers and account rebalancers function with the following rules and restrictions:

- If using a percentage to transfer assets, are allowed in 1% increments up to 100% of the current balance.
- If transferring a dollar amount, must be requested in whole dollar amounts, up to 90% of the current balance and the amount to be transferred on any given fund must be at least \$100.
- May be requested daily.
- May result in redemption and short term trading fees when mutual funds are involved.

The ability to make investment changes may be limited or unavailable during periods of peak demand, market volatility, systems upgrades, maintenance, or for other reasons. It is recommended that change requests or cancellations of pending requests be submitted at least 30 minutes prior to market close. During normal business days, the market closes at 2 pm Mountain time.

When initiating an investment trade, the fund company may reject or delay the trade due to a number of circumstances. If this occurs, the dollar amount of the trade is reinvested in the original investment at the current unit/net asset value as of the day the trade is rejected or delayed. This can cause a gain or loss to the participant's account when units/shares are repurchased on a different day.

Additionally, some funds have the right to impose redemption fees for different reasons, including "excessive trading". If a fund company imposes such a fee on a participant's trade, the fee is deducted from the participant's account.

Money transferred or deposited into a stable value fund, guaranteed fund or certificate, if allowed by the plan, may have restrictions on outgoing transfers.

Before making investment changes or to learn more about the ability of a fund company to reject or delay a trade, or its ability to impose redemption or other fees, participants should refer to the current prospectus and/or disclosure documents for the investment option in question.

Participants may obtain prospectuses and/or disclosure documents on the participant online account. Participants may also contact a Participant Service Center Representative for prospectuses, disclosure documents, or any additional information about investment changes.

NOTE: If some employer contributions are invested based on the employer's direction, the employer has sole discretion in electing the investments and participants are not allowed to direct the investments in that portion of their account.

Rebalance Current Balance

Participants can rebalance their current balance via the participant online account or through a Participant Service Center Representative. On an ad hoc basis, participants can rebalance their account once a business day. Participants can also set up rebalancing to recur on a set frequency (e.g., annually, semi-annually, or quarterly).

Client Experience

Reports available in the Plan Service Center (PSC) provide Clients with insight relative to participant and plan investment balances, participant counts for each investment option, and daily trade activity.

Participant Experience

Depending on the investment options available in the plan, and the plan's rules for participant investment direction, participants may be able to:

- **Choose a target date fund:** Target date funds provide a single fund based on the approximate year a participant would like to retire (which is generally use age 65 as a benchmark) and/or begin withdrawing money.
- **Choose a risk-based fund:** A fund that is designed to align with the participant's risk tolerance level.
- **Choose a model portfolio:** A strategic, pre-selected model portfolio made up of the funds available in the plan.
- **Build a portfolio:** Participants may also build their own portfolio from the investment options available in the plan.

Asset allocation and balanced investment options and models are subject to the risks of the underlying funds, which is generally a mix of stocks/stock funds and bonds/bond funds.

Generally, investment change requests received after market close on business days, or anytime on non-business days, are initiated as of market close of the next business day. The actual effective date of a participant's transaction may vary depending on the investment option selected.

NOTE: Before making investment changes, participants should refer to investment prospectuses and/or disclosure documents.

Change How Future Contributions are Invested

Participants can change how future contributions are invested via online, the automated phone menu, or by contacting a Participant Service Center Representative.

Participant Experience

The participant experience and process for changing how future contributions are invested is identical to rebalancing the participant's current balance EXCEPT the change is only applied to future contributions (except for model portfolios). The participant's current balance, investments and allocations are not impacted by a change to future contributions.

How it Works

Description	Responsible
Initiate Rebalance of Current Balance	Participant
<ul style="list-style-type: none"> Participants are able to initiate account rebalance activities online or by contacting a Participant Service Center Representative. Chooses a target date fund: <ul style="list-style-type: none"> Selects a target date investment option presented which are those within the plan associated with the participant's date of birth on file and their anticipated retirement age as designated by the participant or the plan. Reviews and confirms the investment option(s) from which assets are transferred from and the target date fund assets are transferred to. Chooses a risk-based fund: <ul style="list-style-type: none"> Participants select their desired investment profile related to their risk tolerance level. For example, participants may choose a moderately aggressive profile. Reviews and confirms the investment option(s) from which assets are transferred from and the risk-based fund that assets are transferred to. Chooses a model portfolio: <ul style="list-style-type: none"> Choosing a model portfolio results in the participant's current core account balance and future contributions being allocated to the selected investment. Reviews the underlying investments within the model portfolio; if desired, participants can select a different model portfolio. Reviews and confirms the investment option(s) from which assets are transferred from and the underlying investment options assets are transferred to. NOTE: The underlying funds, allocations, and rebalance frequency of the portfolio are subject to change by the plan. Builds a portfolio from the investment options available in the plan: Participants may also make the following investment options changes, if allowed by the plan <ul style="list-style-type: none"> Deletes/cancels or adjusts current investment allocations. Selects additional investment options available within the plan. Set allocations by investment option. Total allocations must equal 100%. Reviews and confirms the investment option(s) from which assets are transferred from and investment options assets are transferred to. 	
Confirms Rebalance of Current Balance	Empower
<ul style="list-style-type: none"> Sends confirmation of the rebalance of their current account and issues a confirmation number for the transaction. NOTE: Participant confirmations and notices are sent to participants depending on the plan and participant designated confirmation communication preference. 	
Administers Rebalance of Current Balance	Empower
<ul style="list-style-type: none"> Generally, transfer requests received after market close on business days, or anytime on non-business days, are initiated at the close of the next business day. The actual effective date of a participant's transaction may vary depending on the investment option selected. 	

Dividends and Earnings

Overview

A mutual fund is a type of financial vehicle made up of a pool of money collected from investors to invest in securities like stocks, bonds, money market instruments, and other assets. Some securities, like stocks, within the mutual fund, pay earnings in the form of dividends as specified in the fund's prospectus. Dividends represent a portion of a company's profits paid to the company's stock as determined by the company's board of directors.

Dividends paid to mutual funds are passed to participant's accounts (including terminated participants, beneficiaries, alternate payees, and also Plan-level accounts) with a balance in the investment on the Record Date. The record date, payment date, and rate at which the dividend is paid is determined solely by the investment company sponsoring the mutual fund. When a mutual fund pays a dividend to a mutual fund Empower systematically allocates the amount of the dividend owed to each eligible participant's account.

Dividend Dates

There are four important dates investment companies provide when announcing and paying a dividend. These dates occur in sequential order as follows:

Dividend Dates	Description
Declaration Date	<ul style="list-style-type: none">• Also known as the Announcement Date.• This date is the day on which investment company sponsoring the mutual fund announces it is paying a dividend.• A declaration statement is issued on the Declaration Date which includes the following details:<ul style="list-style-type: none">– Rate at which the dividend is credited.– The Record Date and Payment date of the dividend.
Record Date	<ul style="list-style-type: none">• Also known as the Date of Record.• This date is used to determine which participants, with an existing balance in the investment, are eligible to receive a dividend.• The Record Date is typically one business day before the Ex-Date.
Ex-Date	<ul style="list-style-type: none">• Also known as the Ex-dividend Date.• Participants do not receive the dividend for any new money allocated into the investment on or after the Ex-Date.
Payment Date	<ul style="list-style-type: none">• Also known as Pay Date.• This is the day when the dividend is paid or credited.

Allocating Dividends

Empower calculates the amount of the dividend allocated to each eligible account by taking the participant's share balance of the mutual fund on the Record Date and multiplying it by the dividend rate provided by the investment company. The calculated dividend amount is systematically reinvested by Empower to the investment within the participant's account for which the dividend was paid.

Managing Trailing Dividends

Dividend proceeds paid after a participant takes a full distribution is known as a trailing dividend. The manner in which Empower processes trailing dividends depends on when the participant's final distribution was taken relative to when trailing dividends were received.

Final Distribution Within The Last 180 Days

If a participant took their final distribution within the last 180 days of when a trailing dividend is paid, the trailing dividend is distributed in the same payment method as according to the original distribution or rollover instructions.

Final Distribution More Than 180 Days Ago

If a participant took their final distribution more than 180 days before a trailing dividend is paid:

- The trailing dividend is deposited into the participant's account.
- Participant statements are reactivated starting with the next quarterly statement cycle.

NOTE: If the participant's account balance is, or drops below, a predetermined amount that does not warrant its continued maintenance, the Plan's Automated Mandatory Distributions process is followed. See the Automated Mandatory Distribution section of this guide for more information.

Client Experience

Clients may view dividend activity within the Plan Summary report on the Plan Service Center (PSC) in the following sections.

- Transaction Report - Additional Activity: Displays the beginning balance conversions and/or adjustments to earnings, fee restorations, dividends, and expense adjustments.
- Participant Report - Summary by Participants: Displays the participant's name, ID, date of birth, date of hire, termination date, status, and vesting information. Participant balances and transaction activity including dividends are also displayed on this report.

Participant Experience

The below describes how dividend proceeds display online and on quarterly participant statements.

Fulfillment	Details
Online	<ul style="list-style-type: none">• Dividend activity is available to view in the Transaction History section within the participant's online account.• Amounts are listed with a 'Dividend' transaction description along with the date paid when a dividend posts to a participant's account.• Additional details such as the investment, shares, and share price can be viewed by highlighting the specific transaction.
Participant Statements	<ul style="list-style-type: none">• Dividend amounts display in the Transaction Detail section under Dividends/Capital Gains.• The effective date, investment, dollar amount, shares, and share price are displayed.

How it Works

Description	Responsible
Notifies Empower of Dividends	Investment Company
<ul style="list-style-type: none">Announces a dividend is going to be paid on a mutual fund with the Plan.NOTE: The announcement includes other important dividend dates and the declaration statement details, including the Record Date and the rate that the dividend is to be credited.	
Processes Dividends	Empower
<ul style="list-style-type: none">Using the dividend rate and Record Date information provided by the investment company, Empower systematically calculates the amount of the dividend paid to each eligible participant based on shares owned of the mutual fund as of the Record Date.Allocates the calculated dividend amount to eligible participant accounts on the Payment Date.Dividend proceeds for participants who took their final distribution within the last 180 days are distributed in the same payment method according to the original rollover or distribution instructions.Dividend proceeds for participants who took their final distribution more than 180 days ago are deposited into their account and participant statements are reactivated starting with the next quarterly statement cycle.	

My Total Retirement Advisory Services

Overview

My Total Retirement¹ is an Empower Advisory Service (EAS) offered by Empower Advisory Group, LLC, (EAG) a registered investment adviser. My Total retirement is designed for individuals who prefer a hands-off, “do it for me” approach.

My Total Retirement services provide participants with personalized investment assistance unique to their investment needs and goals, including:

- Portfolio management services powered by an independent financial expert.
- Access to EAG investment adviser representatives that can provide retirement readiness reviews.

Clients may choose from the following My Total Retirement enrollment options:

- **Opt-out:** Participants may be automatically enrolled by default.
- **Opt-in:** Participants may choose to actively enroll.

Client Experience

The following participant demographic data is required for Advisory Services and must be included on the Client's payroll file:

- Date of birth
- Gender
- State of residence
- Marital status
- Income/Salary

This information, along with the Plan's designated Normal Retirement Age (NRA), allows EAG to personalize advice and tailor an investment strategy to participants' specific investment needs.

Participants may provide additional data online that can be used to further customize investment strategies and provide more personalized investment advice.

Participant Experience

Participants and eligible employees may enroll in My Total Retirement via the following channels:

- Online
- An EAG investment adviser representative
- Enrollment form

Participants receive the following as members of My Total Retirement:

- Welcome kit describing My Total Retirement's ongoing communication and management strategy.
- The ability to speak with an EAG investment adviser representative.
- Annual kits which are sent on the participant's enrollment anniversary date.

Portfolio Management

Participant portfolios are rebalanced to adjust allocations and investments to align with the participant's investment goals. Rebalancing activities are triggered:

- Quarterly based on the participant's birthdate
- Ad-hoc when updates to participant demographic data are received.

When rebalancing activities occur, a confirmation of the allocation change and investment transfer is sent to the participant based on the Plan and participant communication preferences.

Fees

My Total Retirement fees are:

- Debited from participant accounts following the end of the service billing cycle.
- Charged in the frequency and manner detailed in the terms of service
- Based upon the average daily managed account balance during the billing period in which a participant is in enrolled in the service.

Cancelling Participation

Participants may cancel participation in My Total Retirement online or by contacting an EAG investment adviser representative.

Additional Advisory Services-Related Products

Online Advice

Online Advice is designed for individuals who wish to take a more active role in personally managing their investments but want advice from investment professionals. Eligible participants who do not to enroll in My Total Retirement may access Online Advice at their discretion and choose whether to adjust their investments accordingly.

Online Advice offers personalized fund-level recommendations based on:

- Key participant demographic and financial data.
- Plan's available investment options.

If a participant accepts the recommendation:

- Allocations and investments are systematically adjusted based on the recommendation
- A confirmation of the allocation change and investment transfer is sent to the participant based on their communication preference.

This non-discretionary service is available at no additional cost to participants.

Dynamic Retirement Manager

Dynamic Retirement Manager (DRM)² is a Qualified Default Investment Alternative (QDIA) solution that transitions participants to a professionally managed account as they get closer to retirement. When DRM is the QDIA, participants who do not make an affirmative investment election at the time of enrollment are defaulted into the Plan's initial QDIA investment option, typically a Target Date fund based on the participant's age. Once participants reach the Plan-defined age threshold, they are transitioned to My Total Retirement managed accounts service.

1 Empower Advisory Services refers to the advisory services offered by Empower Advisory Group, LLC, such as My Total Retirement and Online Advice. EAG uses Morningstar Investment Management LLC to provide subadvisory services. EAG and Morningstar Investment Management are unaffiliated registered investment advisers. Morningstar Investment Management is a subsidiary of Morningstar, Inc. EAG is a subsidiary of Empower Annuity Insurance Company of America. Morningstar is a registered trademark of Morningstar, Inc. ©2022 Morningstar, Inc. Future results are not guaranteed by EAG, Morningstar Investment Management or any other party.

2 My Total Retirement offered through Empower Dynamic Retirement Manager is provided by EAG.

Loan Administration (ACH Payments Only)

Overview

When Empower assists in the administration of account reduction loans, eligible participants may request a loan from their retirement account for reasons defined in the plan's Loan Policy and plan provisions. Empower reviews completed requests to determine if the request is in good order and meets plan requirements to be processed without Client's further approval.

The most common loan reasons are listed below:

Loan Type	Description
General Purpose Loan	<ul style="list-style-type: none">Loans taken from a participant's retirement account for any reason.Does not require additional supporting documentation unless plan provisions indicate otherwise.
Principal Residence or Mortgage Loan	<ul style="list-style-type: none">Loans taken from a participant's retirement account to purchase a place of residence, including:<ul style="list-style-type: none">Purchase of existing homePurchase of land on which to build a homePurchase of new homeRequires additional supporting documentation.

NOTE: Notwithstanding any plan terms or plan administrative policy adopted by the plan administrator, please note that Empower does not administratively support processing direct rollovers of participant loan obligations to or from other employer plans.

Loan Initiation

Participants may complete a Loan Application form via the following participant access channels:

- Online account
- Participant Service Center Representative
- Automated phone system
- Paper Loan Application form

A paper Loan Application form is required to be completed if any of the following requirements exists:

- Spousal consent applies.
- Money sources are subject to Qualified Joint & Survivor Annuity (QJSA) requirements.

NOTE: Participants may be assessed a one-time loan initiation fee and/or an ongoing loan maintenance fee.

Loan Payments

Once the Loan Application form has been processed, loan payments are only accepted via Automated Clearing House (ACH) from the participant's bank account. Loan payments are:

- Typically amortized for one payment per month (monthly payments) depending on plan provisions.
- Deposited into the money sources originally used to fund the loan proceeds.
- Reinvested into the participant's account in accordance with the investment election in effect at the time the payment is received.

NOTE: Bank account information must be provided prior to requesting a loan. See Managing Participant Bank Account Information section in this guide for additional information.

Partial loan payments and early loan payoffs are accepted if allowed by the plan. If plan provisions allow, employees may continue to pay their loan via ACH after their severance of employment.

Overpayments: If a loan has been paid in full but a trailing payment is received, Empower returns the overpayment back to the participant.

Excess Payments: If a payment is received and is greater than the amount due and the excess is less than \$25, Empower applies the excess payment to the loan's accrued interest.

For example, if the loan payment due is \$80 and a payment of \$100 is received, the excess payment of \$20 is applied to the loan's accrued interest.

Any excess payment amount over \$25 is returned to the participant.

Leave of Absence

When a participant is on LOA, loan payments may be suspended. The period of time loan payments may be suspended varies based on type of leave.

- **Employer-Approved LOA:** Loan payments may be suspended for up to one year but continues to accrue interest at the current rate.
- **Military LOA:** Loan payments may be suspended for an indefinite period of time in accordance with the amount of time the participant is on military LOA. If the interest rate on the participant's loan is higher than 6%, the interest rate is reduced to 6% for the duration of the leave.
- **Disability LOA:** Loan payments may be suspended for a period of time if a participant is unable to work due to disability.

To suspend scheduled loan payments while employees are out on LOA, the following information must be provided via the Loan Payment Change form: LOA Start Date, LOA Type, LOA End Date

Failure to report employee LOA information could result in inaccurate late loan payment reporting and loan defaults. See Loan Default Administration section for additional information.

NOTE: Loan defaults are not reported to the credit bureaus and does not affect the participant's credit score.

In certain situations, loans payments may be suspended as a result of laws and other guidance pertaining to Disaster (or similar) relief, with such laws defining the maximum period of time in which the plan may allow the loan to be suspended.

If a participant wants to stop ACH debits from their bank account for loan payments during a LOA, the participant must remove their banking information from their online account. Once a participant returns from LOA, the participant must provide their banking information through their online account or over the phone via a Participant Service Representative and instruct Empower to resume ACH debit of loan payments.

Reamortization

If plan provisions allow, a loan may be reamortized to adjust the payment amount, frequency, or method in certain scenarios. For example:

- Participant changes from Active to Terminated.
- Participant returns from LOA.
- Employee moves from a division or classification of employees to another.

LOA reamortization options vary depending on type of leave as follows:

- **Employee Termination:** The maturity date is not extended, and payment amounts due are not reduced.
- **Employer-Approved LOA or Disability LOA:** Loan payments may be suspended for up to one year but continue to accrue interest at the current rate. Reamortizing the loan increases the payment amount due and may only extend the maturity date to the maximum payment term allowed if directed by the Client.
- **Military LOA:** Loan payments may be suspended for the entire period of time the participant is on military LOA. Reamortizing extends the maturity date of the loan for the entire period the

participant was on military LOA, even if extended beyond the maximum payment term allowed. Payments likely do not increase significantly from what they were prior to military LOA.

To Do List

The To-Do List is a feature of the Plan Service Center (PSC) that may be used to assist in expedited loan processing when requests are missing plan-level data or additional information is needed. When applicable, outstanding items are communicated via the To Do List and the Service Team clears the item or works with the Client to resolve.

Participant Experience

Participants have the following tools available to assist in initiating loan requests:

Request Channel	Description
Online Account	<ul style="list-style-type: none">Participants may initiate loan requests.When additional documentation is required for processing:<ul style="list-style-type: none">A Loan Application form is required.Participants may complete the online request and receive a prefilled Loan Application form via email to complete and return with additional documentation for processing.
Participant Service Center Representative	<ul style="list-style-type: none">Participants may contact a Participant Service Center Representative who can assist with initiating a loan request.When additional documentation is required for processing:<ul style="list-style-type: none">A Loan Application form is required.Participants may complete the request with the Participant Service Center Representative.The Participant Service Center Representative either emails a prefilled request form to the participant or mails it to their address of record.
Automated Phone Menu	<ul style="list-style-type: none">If allowed by the plan, participants may initiate loan requests for general purpose loans via the automated phone menu.When additional documentation is required to verify spousal consent per plan provisions, a Loan Application form is required.

The following loan options may be made available to participants across channels and according to plan design:

Option	Description
Loan Restrictions	<ul style="list-style-type: none">If the plan places additional qualifications or restrictions on loans or employer money sources, participants are restricted from taking a loan until qualifications are satisfied.Examples of restrictions includes frequency restrictions, minimum amount requirements, maximum amount requirements, maximum number of loans allowed, waiting period between loans, etc.
Loan Modeling or Quotes	Loan quotes allow participants to enter a loan amount to calculate loan payment amounts based off of payment terms in monthly or yearly increments per plan provisions.

Option	Description
Loan Refinance	<ul style="list-style-type: none"> If a plan allows participants to refinance a loan, participants may: <ul style="list-style-type: none"> Roll the remaining balance of an existing loan into a new loan. Receive proceeds for the difference between the existing loan amount and the new loan amount. NOTE: The maturity date of the existing loan becomes the maturity date of the newly combined loan and the loan term and must exceed the minimum term defined by the Loan Policy and/or per plan provisions.
Payout Options	<ul style="list-style-type: none"> Automated Clearing House (ACH) or direct electronic deposit into an individual bank account if the participant provides the appropriate information to add a bank account to their personal online profile. Fees may apply. Paper check mailed to the payee's address of record via regular mail. Paper check mailed to the payee's address of record via express delivery. Additional fees may apply to expedited delivery. NOTE: ACH delivery is not an available option listed on a paper loan application request form, only available through the participant's online account or over the phone via a Participant Services Representative.
Spousal Consent	<ul style="list-style-type: none"> When spousal consent applies married participants must provide notarized spousal consent in order for Empower to process the transaction. Notarized spousal consent is accepted via the Loan Application form only.
	<ul style="list-style-type: none">
Principal Residence or Mortgage Supporting Documentation	<ul style="list-style-type: none"> For Principal Residence or Mortgage loans, supporting documentation may be required for processing. Purchase of existing home or purchase of land on which to build a home requires the following: <ul style="list-style-type: none"> Primary Residence Purchase Agreement Primary Residence Contract Sale Agreement Executed Counteroffer for either of above – with signature Purchase of a new home requires the following: <ul style="list-style-type: none"> Purchase Agreement Or BOTH: Construction Permit Notice and Letter stating expenses are for building a primary residence Participants may provide supporting documentation for processing by uploading a copy via the participant's online account.
Promissory Note	<ul style="list-style-type: none"> When loan requests are submitted online, the participant accepts the terms of the loan and acknowledges the promissory note online, prior to submitting the request for approval and processing. The Promissory Note is posted to the participants account online for future reference. Promissory Note information is also included with the check when regular mail or express delivery options are selected. Additionally, by signing the back of the loan check, the participant agrees to the terms and conditions of the loan.

Option	Description
Additional Taxation for Florida Residents	<ul style="list-style-type: none"> If the participants' address of record is in Florida, Empower calculates the appropriate Florida Documentary Stamp Tax for the loan amount in instances where plan records provided to Empower reflect that the participant is domiciled in Florida. The Florida Documentary Stamp Tax is deducted from the loan proceeds. Empower remits Florida Documentary Stamp Tax to State of Florida on a periodic basis.

Once the participant completes the Loan Application process, a transaction confirmation number is provided. The following tools are available to assist participants in tracking the processing and status of their loan requests:

- Online account
- Receive email or text notifications with updates

Loan Payments

Outstanding loans for participants who terminate employment prior to the maturity date of the loan term must pay off the loan at termination of employment to avoid loan default or may request that the loan be offset, and the outstanding loan balance becomes taxable. Employees may continue to pay their loan via ACH after their severance of employment. If plan provisions allow, participants may make additional partial loan payments in advance of their scheduled loan payment date.

Participants may view loan payments information, outstanding balance, and general loan transaction history via on the online account.

NOTE: Participants must generate a loan payoff quote via the participant online account or via a Participant Service Representative prior to authorizing payment if paying an outstanding loan balance in full prior to a loan's scheduled maturity date.

General ACH Information

Participants are responsible ensuring sufficient funds are available in their bank account on the due date of each scheduled payment. If the ACH debit fails for any reason, the participant's bank account is not debited a second time for the missed payment and the loan will become delinquent.

Empower may terminate a loan payment arrangement after multiple ACH debit failures or if the banking prenote process results in the financial institution communicating to Empower that the participant's bank account is closed. Empower sends notification letters to participants for each ACH debit failure.

Participants are responsible for remitting any previously missed payments to Empower due to ACH debit failures. Participants are also responsible for providing new banking instructions and instructing Empower to resume debiting loan payments. Participants may add or remove banking information on the participant online account, over the phone through a Participant Service Representative, or by completing a Loan Change Payment Request form and providing a voided check or voided deposit slip.

Leave of Absence (LOA)

For employees who are on an employer-approved or military LOA, scheduled loan payments may be suspended for a period of time during the duration of the leave. To initiate this, a participant may complete a Loan Payment Change form, obtain employer authorization, and submit to Empower. However, completing the Loan Payment Change form does not stop the monthly debit of loan payments from the participant's bank account. Participants must remove their banking information from their online account profile to stop the monthly debt of loan payments and reestablish their banking information via the participant online account once the participant is ready to resume the monthly ACH debit of loan payments.

NOTE: In certain situations, loans payments may be suspended as a result of laws and other guidance pertaining to Disaster (or similar) relief, with such laws defining the maximum period of time in which the plan may allow the loan to be suspended.

How it Works

Description	Responsible
Receives Loan Request	Empower
<ul style="list-style-type: none"> Loan requests that are submitted online, the automated phone menu, or a Participant Services Representative are entered into the recordkeeping system for direct processing. Loan requests requiring additional spousal consent documentation that are initiated via a Participant Services Representative result in a Loan Application form being provided to the requester, allowing the payee to submit with additional required documentation or notarized spousal consent. NOTE: For principal residence or mortgage loans, participants may initiate the loan request online or over the phone with a Participant Services Representative then provide supporting documentation by uploading a copy via the participant's online account. Loan requests may also include the following as submitted on the Loan Payment Change form: <ul style="list-style-type: none"> LOA type including start and end notification. Reamortization requests for LOA. NOTE: Loan Payment Change Request forms require Client authorization. 	
Processes Loan Request	Empower
<ul style="list-style-type: none"> Loan requests received not in good order are returned to the participant with instructions for providing corrected information, notarized spousal consent, or other required documentation. Requests received in good order but where plan-level data or additional information is needed for processing are sent to the To Do List for the Service Team to review and resolve. If the Service Team cannot clear the item, the Client is contacted to provide information, data, or direction needed for processing. For loan requests received in good order, processes the loan request as directed by plan rules and participant direction. Sends requested funds to participant via the elected payment method. 	
Confirms Transaction	Empower
<ul style="list-style-type: none"> Notifies participants of loan processing receipt and updated status via text or email, if elected. Updates loan summary details on the participant's online account. 	
Processes Loan Payment	Empower
<ul style="list-style-type: none"> Posts loan payment to participant's account once the loan payment is received via ACH from the participant's bank account. NOTE: Payments are deposited into money sources used for funding the loan and according to participant's current investment and allocation elections. Overpayments: In situations where a loan has been paid in full but a trailing payment is received, Empower returns the overpayment back to the participant. Excess Payments: If a payment is received and is greater than the amount due and the excess is less than \$25, Empower applies the excess payment to the loan's accrued interest. For example, if the loan payment due is \$80 and a payment of \$100 is received, the excess payment of \$20 is applied to the loan's accrued interest. Any excess payment amount over \$25 is returned to the participant. 	

Description	Responsible
Processes LOA and Reamortization	Empower
<ul style="list-style-type: none"> Processes Loan Payment Change requests including: Loan payment suspensions for LOA and loan payment reinstatement upon return from LOA. Requests to change loans are submitted via the Loan Payment Change form. Suspends scheduled loan payments for the following as directed by the Client: <ul style="list-style-type: none"> Employer-approved LOA or Disability LOA: Suspend scheduled loan payments due until LOA end date is received or for up to one year, whichever is sooner. Military LOA: Suspend scheduled loan payments due until LOA end date is received. NOTE: If the interest rate on the participant's loan is higher than 6%, reduced to 6% for the duration of the leave. Reamortize loan payments for the following if directed by the Client: <ul style="list-style-type: none"> Employer-approved LOA or Disability LOA: Reamortize loan payments and extend maturity date if applicable. NOTE: Maturity date may not exceed the maximum loan payment term allowed. Military LOA: Reamortize loan payments and extend maturity date if applicable. NOTE: Maturity date may be extended for the entire period the participant was on military LOA, even if extended beyond the maximum payment term allowed. Reinstates scheduled loan payments for employees with reported LOA end dates. NOTE: Participants <u>must remove their banking information from their online account profile to stop the monthly debt of loan payments</u>. Once a participant returns from LOA, the participant must provide banking information and instruct Empower to resume the monthly ACH debits for loan payments. 	
Review Participant Loan Information	Client
<ul style="list-style-type: none"> At any time, Clients can access the Loan Detail Report available on the PSC. Loan information includes loan attributes, payment history, current status and default information. 	
Confirms Loan Paid in Full	Empower
Loan payoff confirmations are sent to participants depending on the plan and participant designated confirmation communication preference.	

Loan Default Administration

Overview

When participants fail to repay a loan from their retirement account according to the loan terms, the loan defaults. Common causes of loan defaults include:

- Payments not deducted from the participant's paycheck and submitted to Empower for repayment.
- Participants work fewer hours than expected and their paycheck is not large enough to cover the loan payment.
- Participant is on an approved Leave of Absence (LOA) and the Client or participant fails to notify Empower.
- Participant is no longer employed at the company and the Client or participant fails to notify Empower.

When a loan defaults and is not timely cured (generally by the end of the calendar quarter following the quarter in which the payment was missed), the outstanding principal loan balance, plus accrued interest is reported as a deemed distribution from the Plan. As a result:

- The loan remains an obligation of the participant and continues to accrue interest.
- The loan is subject to maintenance fees if applicable.
- The remaining unpaid loan balance, plus accrued interest, is reported as taxable income on an IRS Form 1099-R.

NOTE: Active loans, including those in a default status, are considered plan assets for the purposes of plan audits and year-end compliance testing.

The defaulted loan remains active until the participant takes one of the following actions:

- Repays the loan in full, including accrued interest.
- Experiences a qualifying event so the loan may be offset in accordance with the Plan's loan policy.

Offsetting a loan permanently reduces the participant's vested account balance in the amount of the outstanding principal loan balance due, plus accrued interest.

Examples of qualifying events that may allow a loan offset include:

- Separation of service or termination of employment
- Death or Disability
- Normal retirement age

Refer to the Plan's loan policy for a listing of qualifying events the plan allows to offset a loan.

Late Loan Notification

Most plan loan policies provide for a period of time by which Plan Administrators and participants may bring the loan payments current to avoid the loan being reported as a taxable deemed distribution. This time period is referred to as the Plan's Cure Period.

The standard Cure Period is quarterly but could vary based on the Plan's loan policy. Clients have until the end of the cure period to submit late payments on behalf of participants in order to prevent the reporting of the defaulted loan as a taxable deemed distribution.

For plans with a quarterly cure period, at the beginning of each quarter, Empower notifies the participant and the Plan Administrator of any missed or late loan payments for the previous quarter:

- Participants are notified via a Loan Delinquency Notice.
- Plan Administrators receive an electronic copy of the Late Loan Report accessible via the Plan Service Center (PSC).

The following activities may be involved in preventing loans from defaulting:

- Plan Administrator and participant coordinate funding of missed payments.
- Submit late loan payment amounts, including accrued interest, to Empower for processing.
- Client submits employment status updates, such as termination date or LOA start date, to Empower.

Defaulted Loans Reported as Deemed Distributions

If the Plan Administrator and participants fail to bring the loan payments current during the Cure Period, the loan is reported as a taxable deemed distribution on an IRS Form 1099-R and the loan reflects a default status on the recordkeeping system.

Participant Experience

Participants who have any missed or late loan payments for the previous quarterly cure period are provided with a Loan Delinquency Notice that includes the following information:

- Amount of the delinquent loan payments, including accrued interest.
- Date by which the loan payments must be made current to avoid a default of the loan.

Active participants, who are not on LOA, may take the following actions to avoid default:

- Contact the Plan Administrator to bring loan payments current during the Cure Period.
- Contact the Plan Administrator to correct payroll deductions and future payroll file submissions.
- Depending on plan provisions, remit additional payments directly to Empower by the end of the cure period to make up for any late or missed payments.

Leave of Absence

For participants who receive a loan delinquency notification and are on an employer-approved bona fide leave, a qualified military Leave of Absence (LOA) or leave of absence due to short term disability, or for other reasons of LOA allowed by the plan, participants complete and submit a Loan Payment Change Request form to indicate the applicable LOA start date.

The Loan Payment Change Request form is available to:

- The Plan Administrator to download from the Plan Service Center.
- The participant to download via the participant online account or requested by contacting a Participant Services Representative.

Participants must obtain plan authorization before submitting a Loan Payment Change Request form. If Plan Administrator submits the Loan Change Payment Request form to Empower on behalf of a participant who is already on leave, an Authorized Plan representative (participant signature not required) must approve the form.

Loan Offset

If participants experience a qualifying event, such as separation of service, the loan may automatically offset based on the loan policy, or they may choose to offset the loan by completing a Loan Offset Request form. The Loan Offset Request form is available for the participant to download from their online account or by contacting a Participant Services Representative. The form is also available for Clients to download from the Plan Service Center (PSC).

Participants must obtain the approval of an Authorized Signer on the form before submitting the Loan Offset Request form. Once the loan is successfully offset, participants receive a Loan-Offset Notification.

How it Works

Description	Responsible
Distributes Late Loan Notifications	Empower
<ul style="list-style-type: none"> On a quarterly basis, identifies participants with missed or late loan payments for the previous quarter. NOTE: The standard Cure Period is quarterly but could vary based on the Plan's loan policy. Sends Loan Delinquency Letters to impacted participants. Provides a copy of the Late Loan report to the plan Loan Administration contact via the PSC. 	
Correct Clerical Errors	Client
<ul style="list-style-type: none"> Review Late Loan report to identify potential loan payment clerical errors. NOTE: Common errors include: missing termination dates, missing or incorrect loan payment information, misapplied payments, or missing leave of absence information. Work with the Service Team to correct clerical errors and to prevent applicable loans from defaulting in error. Update payroll system and future payroll files to help avoid future loan payment errors. 	
Bring Loan Payments Current or Submit Offset Request	Participant/Client
<ul style="list-style-type: none"> Work with Plan Administrator to research and resolve late, misapplied, or missed payments. Submit late/missed payment amount or corrects misapplied payment needed to bring the loan current. Participants who have experienced a qualifying event submit a Loan Offset Request form with plan authorization to process the outstanding principal loan balance plus accrued interest as a deemed distribution. 	
Offsets or Defaults Loans	Empower
<ul style="list-style-type: none"> Processes loan offset automatically based on loan policy or based on requests received in good order and approved by an Authorized Signer. Reports defaulted loans that have not been timely cured as taxable deemed distributions and loan offsets, as applicable. Sends participant loan offset or default notifications, as applicable, to participants. 	
Issues Tax Forms	Empower
<ul style="list-style-type: none"> Issues appropriate tax forms reporting the outstanding principal loan balance plus accrued interest as taxable income to the participant in the year of the deemed distribution or loan offset. A copy of the tax form is provided to participants early in the following tax year. 	

Withdrawal Processing

Overview

Empower processes withdrawals it determines to be in good order without the Client's further approval for the following reasons for the following reasons, as allowed by the plan:

- Age 59 ½, or as defined by plan provisions
- In-service
- In-service retirement age
- Retirement
- Severance from employment (separation of service)

NOTE: Some in-service and separation of service distribution reasons have additional requirements. See Hardship Withdrawal Processing, QDRO Processing, Death Claim Processing, Automated Mandatory Distribution Processing, Disability Withdrawal Processing, and Required Minimum Distributions sections of this guide for additional information.

To Do List

The To-Do List is a feature of the Plan Service Center (PSC) that is used to assist in expedited withdrawal processing when requests are missing plan-level data or additional information is needed. Outstanding items are communicated via the To Do List and the Service Team clears the item and work with the Client to resolve, when applicable.

Tax Reporting

Empower performs the following services with regards to tax reporting for distributions processed from the recordkeeping system:

- Acts as the plan's agent to perform income tax withholding and reporting for all distributions processed from the recordkeeping system.
- Deposits the income tax withheld with the Internal Revenue Service ("IRS") and other appropriate governmental entities, as applicable, on or before the applicable due dates for such remittances.
- Completes and files necessary tax reporting forms for distributions processed with the IRS or other governmental authority, as applicable, and sends copies to the payee.

Distributions to a foreign person are subject to withholding rates that differ from those applicable to United States residents. The payee certifies their US citizenship or alien status for each withdrawal request.

Participant Experience

Participants, including beneficiaries and alternate payees (collectively referred to as 'payees') may request distributions from any of the following access channels:

Request Channel	Description
Online	Payees may initiate withdrawal requests for most common separation of service and in-service reasons by accessing their online account.
Automated Phone Menu	Payees may initiate withdrawal requests for most common separation of service and in-service reasons via the automated phone menu.

Request Channel	Description
Participant Service Center Representative	<ul style="list-style-type: none"> • Payees contact a Participant Service Center Representative who can assist with completing their request. • Participant Service Center Representative withdrawal assistance includes the following as applicable: <ul style="list-style-type: none"> – Review distribution options available based on the terms of the plan. – Review distribution qualifications and restrictions as defined by plan provisions. – Explain tax withholding requirements and penalties. – Review the consequences of the distribution on any outstanding loans. – Discuss the impact of investments being held in a Self-Directed Brokerage (SDB) Account, if applicable. – Introduce rollover opportunities from which to choose.

NOTE: When additional documentation or consent is required for processing, a distribution request form is required to be completed for processing.

Distribution Request Form

When a form is required, payees may complete the request online or with the Participant Service Center Representative and receive a prefilled request form via email or mail to complete and return for processing. Distribution request forms are available online or via a Participant Services Representative.

Good Order Requirements

All requests must contain complete payment directions, meaning that all required information on the distribution request form, whether paper or online, has been completed, including all required signatures or authorizations.

Spousal Consent

When distribution spousal consent applies, married payees must provide notarized spousal consent in order for Empower to process the transaction. Notarized spousal consent is accepted via distribution request forms only.

Qualifications and Restrictions

When the plan places additional qualifications or restrictions on distributions or employer money sources, payees are restricted from withdrawing until qualifications are satisfied and/or restrictions overcome.

Examples of qualifications include:

- Vesting
- Years of service
- Holdback

Examples of restrictions include:

- Frequency restrictions
- Minimum amount requirements
- X days after a termination date is received

Withdrawal Options

According to plan provisions, the following options may be available to payees.

Option	Description
Withdrawal Amount	<ul style="list-style-type: none"> • Full account balance. • Partial account balance.

Option	Description
Payout Method	<ul style="list-style-type: none"> Automated Clearing House (ACH) or direct electronic deposit into an individual bank account if the payee provides the appropriate information to add a bank account to their personal online profile. Paper check mailed to the payee's address of record. Direct rollover to another qualified retirement plan or IRA. Installments or periodic payments.
Payout Delivery Method	<ul style="list-style-type: none"> For paper check payout option, payees have the ability to request standard or expedited delivery. Additional fees may apply to expedited check delivery and ACH.
Taxation	<ul style="list-style-type: none"> Empower withholds all mandatory federal and state taxes. Payees may elect alternate federal and state tax withholding as applicable to their state of residence and the withdrawal type requested. When foreign taxation requirements apply, A W-8BEN form is required for processing. 402(f) Notice of Special Tax Rules on Distributions presented to payees when applicable.

Investment Advice & Distribution Recommendations

With Investment Advice and Distribution Recommendation services, a representative may offer investment advice and provide recommendations on available investment options and services under the plan as a fiduciary under ERISA to participants on certain plan transactions.

Point-in time investment advice may be provided on the following as available under the plan:

- Designated investment alternatives
- Investment advisory services available

Distribution Education Services

Empower makes retirement education consultants available to participants to provide distribution education services. Retirement education consultants may:

- Contact participants who are eligible to receive distributions from the plan.
- Provide information regarding distribution and rollover options under the plan.
- Provide information on rollover services and products offered by Empower.

NOTE: When acting as a fiduciary, Empower representatives act:

- In the best interest of the participants as required under ERISA.
- Pursuant to Department of Labor regulations and applicable SEC and FINRA requirements.

How it Works

Description	Responsible
Receives Withdrawal Request	Empower
<ul style="list-style-type: none"> Withdrawal requests submitted online via the participant online account or automated phone menu are received electronically. Withdrawal requests initiated through a Participant Service Center Representative result in either of the following: <ul style="list-style-type: none"> Information is entered into Empower's recordkeeping system for direct processing. Withdrawal request form is partially completed and provided allowing the payee to complete and return with additional required documentation such as notarized spousal consent. Requests received not in good order are returned to the requester with instructions for providing corrected information. Requests received in good order but where plan-level data or additional information is needed for processing are sent to the To Do List for the Service Team to review and resolve. If the Service Team is unable to clear the item, the Client is contacted to provide information, data, or direction required for processing. 	
Processes Withdrawal Request	Empower
<ul style="list-style-type: none"> Debits participant's account according to directions and payment instructions included in the request. Sends requested funds to payee via elected payment method. 	
Confirms Transaction	Empower
<ul style="list-style-type: none"> Notifies payee via email or text message if elected with processing status updates. NOTE: Notification includes a transaction confirmation number. Updates Withdrawal Summary details on the payee's online account. 	
Issues Tax Forms	Empower
Sends applicable tax forms to the payee in the year following the distribution.	

Disability Withdrawal Processing

Overview

Plan Documents define the following provisions for disability claims:

- Conditions that must be met for an employee to be considered disabled for the purposes of taking a disability distribution.
- Whether an employee becomes 100% vested upon termination due to disability.

Participants under the age of 59 ½ who also meet the Internal Revenue Service Code 72(m)(7) definition of disability are exempted from the Federal 10% early withdrawal penalty.

Clients must review all disability withdrawal requests to determine if the participant:

- Meets the definition of disability under the terms of their Plan Document.
- Has separated from service due to disability.
- Meets the definition of disability under IRS code 72(m)(7).

Disability Withdrawal Request forms are available to download online from the participant's account or may be requested via a Participant services Representative. Clients may also access participant forms via the Plan Service Center (PSC).

How it Works

Description	Responsible
Submit Request to Employer	Participant
<ul style="list-style-type: none">• Complete Disability Withdrawal Request form including disability details and employment status.• Attach supporting documentation (Social Security Administration's determination of disability or other documentation) evidencing the disability needed for the Plan Administrator's review.	
Receive and Submit Request	Client
<ul style="list-style-type: none">• Review the Disability Withdrawal Request form and supporting documentation.• Determine if the participant:<ul style="list-style-type: none">– Meets the definition of disability under the terms of their Plan Document.– Has separated from service due to disability.– Meets the definition of disability under IRS code 72(m)(7).• An Authorized Signer must complete the Plan Administrator Signature section of the form to provide specific processing direction with regards to vesting and taxation.• Client/participant submits signed Disability Withdrawal Request form to Empower for processing.	
Processes Disability Withdrawal Request	Empower
<ul style="list-style-type: none">• Receives and reviews Disability Withdrawal Request form.• Requests received not in good order are returned to the requester with instructions for providing corrected information.• For requests received in good order, debits participant's account according to directions and payment instructions included in the request.	
Confirms Transaction	Empower
<ul style="list-style-type: none">• Notifies payee via email or text message if elected with processing status updates.• NOTE: Notification includes a transaction confirmation number.• Updates Withdrawal Summary details on the payee's online account.• Sends requested funds to payee via elected payment method.	
Issues Tax Forms	Empower
Sends applicable tax forms to the payee in the year following the distribution.	

Required Minimum Distributions

Overview

The Required Minimum Distribution (RMD) service allows Empower to assist Clients in adhering to the Internal Revenue Service (IRS) code requiring participants to take distributions from their qualified retirement account once they have reached RMD age.

RMD age is defined by the following:

- The RMD age for participants born prior to July 1, 1949 is 70 ½.
- The RMD age for participants born on or after July 1, 1949 is 72.

The following table outlines when participants must begin taking RMD payments.

Description	Required Beginning Date (RBD)
Terminated participants who have reached RMD age	Terminated participants must begin taking RMDs no later than April 1 of the calendar year following the year participant reaches RMD age or the year they retire, whichever is later.
Active participants of RMD age, who own 5% or more of the sponsoring company, as defined by the IRS	Participants who own 5% or more of the sponsoring company must begin taking RMDs no later than April 1 of the calendar year following the year the owner reaches RMD age regardless of employment status.
Beneficiaries and alternate payees who may also be required to take RMDs	<ul style="list-style-type: none">• RBD is based on plan provisions and additional factors such as the relationship of the beneficiary or alternate payee to the decedent and the decedent's RMD situation at the time of death.• Beneficiaries and alternate payees must begin taking RMDs no later than December 31 of the year they are subject to take an RMD.

Payments in Subsequent Years

RMDs for subsequent tax years must be processed by December 31 for all participants, alternate payees, and beneficiaries subject to take an RMD.

If the participant fails to satisfy their RMD in any year, the participant may incur a 50% excise tax from the IRS on the amount not paid timely.

Calculating RMDs

The **IRS Uniform Lifetime Table** is used to calculate participants' RMDs.

If the participant has a sole, spousal beneficiary who is more than 10 years younger, the participant can instruct Empower to use the **IRS Joint and Last Survivor Table** instead.

The **IRS Single Life Table** is used to calculate RMDs for beneficiaries and alternate payees.

Participant Experience

RMD Notices are sent annually to all RMD eligible participants, beneficiaries, and alternate payees who have not satisfied their RMD for the year.

RMD Notices include the following information:

- Plan's obligation to pay the RMD
- Plan's default payout methods (partial distribution, full withdrawal, periodic payments, or annuity)
- Instructions to access the participant's online account or contact the Participant Service Center to request different payout amounts or a payout method other than the plan's default.
 - Participants who are eligible to delay their first year RMD to April 1 have until March 1 to select a different payout election for their RMD.
 - Participants, beneficiaries, and alternate payees in subsequent RMD years have until November 1 to select a different payout election for their RMD.
- Calculated RMD amount
- RMD taxation requirements including:
 - RMDs paid as a partial distribution are subject to 10% federal withholding.
 - RMDs paid as a full withdrawal are subject to 10% federal withholding on the RMD amount and 20% on the rollover eligible amount.
 - RMDs paid as periodic payments are subject to federal withholding based on a marital status of Married plus Three Exemptions.
 - RMDs are subject to state withholding based on the state of domicile at the time the RMD is processed.
 - RMDs paid to a foreign address are subject to the IRS 30% federal withholding rules.

Empower automatically processes according to the plan's default RMD payout provisions prior to or by December 31 unless the participant, beneficiary, or alternate payee informs Empower that they elect to deviate from the plan's default RMD payout provisions. If the plan requires spousal consent to a distribution for administrative purposes (not QJSA), Empower automatically processes default RMD payouts regardless of whether spousal consent is received.

If the participant is subject to Qualified Joint and Survivor Annuity (QJSA) provisions, the Client is notified to purchase an annuity for their entire account balance before December 31.

NOTE: Participants who are eligible to delay their first year RMD to April 1 have until March 1 to select a different payout election for their RMD. First year RMD and/or distributions for participants who do not respond are automatically processed by April 1 of the following year. Such participants are also required to take another RMD (for the second tax year) by December 31 of the second year, resulting in the first and second tax year RMDs being paid in the second year. If plan provisions require a full distribution of the remaining account balance at the time the initial RMD is paid, then both the first and second tax year (if applicable) RMDs are paid as part of the full distribution.

If the participant is subject to QJSA, the Client is notified to purchase an annuity for their applicable account balance before April 1 for the participant's first RMD payment.

How it Works

Description	Responsible
Review and Verify RMD Eligible Individuals	Client
<ul style="list-style-type: none"> Annually, Empower provides overview communication to Clients summarizing the RMD process. Client reviews and verify eligible RMD recipient data. Eligible RMD recipient information is available on the following Plan Service Center (PSC) reports: <ul style="list-style-type: none"> Required Minimum Distribution Report Participant Data Extract Report Verify accuracy of applicable participant data including: <ul style="list-style-type: none"> Employment status Date of birth Date of death Termination date Beneficiary and alternate payee accounts in the plan 5% owner status for all terminated and active participants who are of RMD age or older (or will be of RMD age before December 31) and all 5% owners who remain actively employed 	
Identifies and Notifies RMD Eligible Individuals	Empower
<ul style="list-style-type: none"> Identifies individuals who are subject to the plan's RMD rules in the current tax year. Sends RMD Notification outlining RMD requirements and default payout options to impacted individuals. Notifications are sent based on plan and participant communication preferences. NOTE: If Empower does not receive updates by June 1, the annual RMD process will begin based on information in the recordkeeping system. 	
Processes RMD Payment Requests	Empower
<ul style="list-style-type: none"> Processes RMD requests as directed when RMD eligible individuals provide alternate payment instructions. After the response cut-off date, processes the remaining RMD payments according to the plan's default payout options. For first-year RMDs only, and if the plan is not subject to QJSA (or a contribution source in the Plan which could be used to pay the RMD), processes the RMD by April 1 of the following year for participants who did not provide an election. If the participant is subject to QJSA, notifies the Client to purchase an annuity by April 1. If no response from the participant is received, and the plan is not subject to QJSA (or a contribution source in the Plan which could be used to pay the RMD), processes the RMD by December 31. If the participant is subject to QJSA, notifies the Client to purchase an annuity before December 31. NOTE: Such participants are also required to take another RMD (for the second tax year) by December 31 of the second year, resulting in the first and second tax year RMDs being paid in the second year. Sends requested funds to participant via elected or defaulted payment method. 	
Confirms Transaction	Empower
<ul style="list-style-type: none"> Notifies participants via text message or email, if elected. Updates withdrawal summary details in the participant's online account. 	
Issues Tax Forms	Empower
Sends tax forms to the account owner in the year following the distribution, reporting the amount distributed in the year paid.	

Automated Mandatory Distribution Processing

Overview

Mandatory distribution provisions (AKA force-out, involuntary distribution, mandatory cash-out, etc.) allow Clients to reduce Plan administrative expenses by forcing terminated participants with low vested account balances to take their money out of the Plan.

When mandatory distributions are allowed by the Plan, the Plan document defines the following types of force-out provisions:

- **Cash-out threshold:** The vested account balance maximum that can be involuntarily distributed to the participant, such as \$1,000.00
- **Rollover threshold:** The vested account balance amounts (or ranges) that can be involuntarily rolled into an Individual Retirement Account (IRA) on behalf of the participant, such as \$1,000.00-\$5,000.00
- If rollover sources are included or excluded from a mandatory distribution threshold.
- Whether and how to combine Non-Roth and Roth money sources when determining if a vested account balance is within a mandatory distribution threshold.
- Whether or not to include participants of age 62 or the Plan's defined normal retirement age whose vested account balance does not exceed the alternate limit specified.

Empower's Automated Mandatory Distribution (AMD) service assist Clients with administering applicable mandatory distribution provisions as follows:

- Identifying terminated participants with low vested account balances that meet Plan-defined thresholds outlined above.
- Providing the required notification and opportunity to voluntarily withdrawal funds before forcing a participant out of the Plan based on the Plan-defined force-out reporting frequency.
- Managing the involuntary distributions or rollovers to an Individual Retirement Account (IRA) as defined by the Plan.

Identifying Terminated Participants

The AMD Report is the vehicle used to identify and communicate terminated participants who qualify for a mandatory distribution based on the terms of the Plan. The AMD report generates according to the Plan-defined mandatory distribution reporting frequency and identifies terminated participants who:

- Meet the cash-out threshold to be paid in a lump sum unless otherwise directed.
- Are within the rollover threshold range to be automatically rolled into a Millennium Trust IRA.
- Meet the criteria but could be rejected from the AMD process.

Clients must designate a Plan contact who is authorized to receive Plan-level and Participant-level reports provided by Empower. This individual is responsible for:

- Accessing and reviewing all AMD reports posted to the Plan Service Center (PSC).
- Reviewing the AMD Report and working with the Service Team to resolve any participant accounts rejected from the process in error before the next scheduled participant notice delivery date.

Providing Required Notification

On the scheduled participant notice delivery date, Empower generates and sends a Mandatory Distribution Letter to impacted participants. The Mandatory Distribution Letter outlines the mandatory distribution process and provides instructions for participants to make a voluntary withdrawal if desired. Participants must respond by the date indicated in the Mandatory Distribution Letter with alternate distribution instructions. If participants take no action, they remain in the AMD population to be forced out of the Plan as described below.

Managing Involuntary Distributions

When participants take no action by the scheduled automated mandatory distribution date, assets in their accounts are distributed according to the Plan's force-out provisions:

- Vested account balances less than the Plan's cash-out threshold are distributed as a lump sum distribution as applicable.
- Vested account balances within the Plan's rollover threshold are rolled into an IRA provided by Millennium Trust Company¹ as applicable.

When AMD Services are active, Empower processes distributions and rollovers in good order without the Client's further approval and in accordance with procedures outlined below.

Participant Experience

Terminated participants with a vested account balance below the Plan-defined force-out thresholds receive a Mandatory Distribution Letter outlining the following:

- Vested account balance.
- How their account balance will be distributed if they don't respond with alternate withdrawal instructions prior to the automated mandatory distribution date.
- The automated mandatory distribution date.
- How to provide alternate withdrawal or rollover instructions.
- 402(f) Notice of Special Tax Rules on Distributions.
- Millennium Trust IRA fees if applicable.
- Contact information for questions.

Participants must respond by the date indicated in the Mandatory Distribution Letter with alternate distribution instructions. If the participant takes no action, the assets in the account are distributed according to information provided in the Mandatory Distribution Letter.

For accounts rolled into an IRA provided by Millennium Trust Company, participants receive an information packet prepared by Millennium Trust Company.

¹Millennium Trust Company is the exclusive IRA provider for Empower's AMD service and is not affiliated with Empower and its affiliates.

How it Works

Description	Responsible
Generates AMD Report	Empower
<ul style="list-style-type: none">• Generates and posts the AMD Report to the PSC Report directory according to the mandatory distribution report frequency elected by the Client.• Emails the AMD Contact(s) when the AMD Report has been posted.	
Reviews AMD Report	Client
<ul style="list-style-type: none">• Reviews the AMD Report, including participant account details reflected on the Eligible Tab and the Rejected Tab.• Works with the Service Team to update participant accounts prior to the next scheduled participant notice delivery date as applicable.	
Issues Mandatory Distribution Letters	Empower
<ul style="list-style-type: none">• On the next scheduled participant notice delivery date, issues Mandatory Distribution Letters to participants who are:<ul style="list-style-type: none">– Within the Plan's force-out thresholds.– Not listed on the Reject Tab of the AMD Report.• NOTE: Participants who remain on the Rejected Tab do not receive a Mandatory Distribution Letter.	

Description	Responsible
Receives Mandatory Distribution Letter	Participant
<ul style="list-style-type: none"> Receives the Mandatory Distribution Letter and either requests a voluntary distribution or takes no action. If a participant takes no action, account assets are distributed or rolled over on the automated mandatory distribution date. 	
Processes Mandatory Distributions and IRA Rollovers	Empower
<ul style="list-style-type: none"> On the mandatory distribution date, processes distributions or rollovers for participants who meet the force-out criteria and have not provided alternate distribution instructions. Sends transaction confirmations to impacted participants according to Plan and participant communication preferences. NOTE: Millennium Trust prepares and sends an information packet to participants who are automatically rolled over. 	
Issues Tax Forms	Empower
Sends appropriate tax forms to the participant in the year following the distribution or rollover.	

Power of Attorney, Guardianship, or Conservatorship

Overview

A Power of Attorney (POA), Guardianship, or Conservatorship appointment identifies the party authorized to act on behalf of the participant and the extent of their authority with respect to the participant's account.

Upon receipt of a POA, Guardianship, or Conservatorship appointment, Empower prepares a Letter of Direction which is delivered to the Client via the Service Team. The Client directs Empower to the extent at which the appointee(s) may transact on behalf of the participant.

The request is for Guardianship or Conservatorship, the Letter of Direction remains in effect until Empower is otherwise notified in writing by the Client or the Client can provide the expiration date stated on the order.

How it Works

Description	Responsible
Submit Request to Empower	Participant
<ul style="list-style-type: none">Participant and/or Attorney-in-Fact/Conservator/Guardian forward the POA, Guardianship, or Conservatorship appointment request to Empower.The participant's state of residence may require that the request be notarized.	
Receives and Reviews Request	Empower
<ul style="list-style-type: none">Prepares a Letter of Direction upon receipt.Submits the POA and Letter of Direction to Client to review.	
Review and Authorize Request	Client
<ul style="list-style-type: none">Review the POA, Guardianship, or Conservatorship appointment request to determine if the request is acceptable.Complete, sign, and return the Letter of Direction to Empower, documenting the Client's acceptance of the POA, Guardianship, or Conservatorship appointment request, scope of authority and direction.	
Updates Participant Account	Empower
<ul style="list-style-type: none">Updates the applicable record keeping systems to reflect the identified party(ies) authorized to act, along with the scope of their transactional authority, on behalf of the participant.NOTE: The Agent or Attorney-in-Fact, or a POA, must sign in their official capacity when submitting transaction forms or written requests.Adds narratives to the participant's account for Service Team representatives with details of the POA, Guardianship, or Conservatorship appointment.Coordinates imaging of documentation for access by applicable Service Team representatives.	
Confirms Approval and Setup	Empower
Sends letter to participant, POA(s), Conservator(s), and/or Guardian(s) to confirm approval and set up of appointments.	

Death Claim Processing

Overview

A death claim is a request made by a beneficiary or other potential claimant for the transfer or payout of a deceased participant's (decedent's) Plan account assets.

Empower's Death Claim Approval Service assists Clients with administering applicable death benefits as follows:

- Receiving and verifying official notification of death.
- Identifying and verifying the decedent's beneficiaries of record.
- Processing death claims received in good order without the Client's further approval.

Notification of Death

A death certificate is considered official notification of death and must be submitted to Empower to initiate the death claim process.

Death certificates must include a cause of death. However, some states do not indicate a cause of death on the certificate (e.g. New York and Florida). In these circumstances, the death certificate (without listing the cause of death) is acceptable. Death certificates with a cause of death listed as "pending investigation" are not accepted.

If the participant died outside of the United States, instead of a traditional death certificate, the claimant must provide a Report of a Death of an American Citizen Abroad certificate certifying the deceased died outside of the United States. This would also be considered official notification of the participant's death.

Official notification of death is accepted from Clients, beneficiaries, or other potential claimants to initiate the death claim process.

Beneficiaries of Record

Once official notification of death is received in good order, Empower reviews the decedent's account and any applicable hard copy forms to identify designated beneficiaries.

When beneficiaries are identified, Empower:

- Establishes a separate Takeover Account for each named beneficiary
- Transfers the decedent's account proceeds into the beneficiary's takeover account according to the benefit percentage allocated by the decedent.

NOTE: If paying out 100% of the funds to a single beneficiary, it may not be necessary to establish a Takeover Account.

Empower then sends notification to each beneficiary of record, which includes Takeover Account notification and a Death Benefit Claim Request form. The notification also informs beneficiaries of the payout options available to them under the terms of the Plan.

Beneficiaries must submit a Death Benefit Claim Request form to initiate the payout process. If the beneficiary does not file a death benefit claim, assets remain in the Takeover Account until a distribution or rollover is requested and no further attempts are made to contact the beneficiary.

NOTE: If a beneficiary dies before a valid death claim request can be processed, the beneficiary of the newly deceased beneficiary needs to be identified. In this case, Empower contacts the Client for direction.

No Beneficiary

If the decedent has no named beneficiaries on file, Empower may contact the Client to determine if employee records name a beneficiary.

If there is still no beneficiary designation for the decedent, Empower pays the entire account balance in the form of a lump sum in the following order referred to as the distribution hierarchy:

- To the surviving spouse, if any
- To the participant's estate

This distribution hierarchy must be consistent with the Plan document for Empower to provide the Death Claim Approval Service. The provisions above do not constitute an amendment of the Plan document in the event Plan terms are inconsistent with this payout structure.

If the Plan's distribution hierarchy is anything other than 1) Spouse 2) Estate, then the Client is responsible for providing and/or confirming payout instructions.

Additional Documentation Requirements

Additional documentation may be required to certify different types of beneficiaries. Documentation may be labeled differently but may still be acceptable. Additional documentation requirements may include the following:

Documentation	Description
Small Estate Affidavit	<ul style="list-style-type: none">• Most states offer a small estate procedure for estates with assets under a certain dollar amount as dictated by the state.• This eliminates the need for a Tax Identification Number (TIN) for the estate.• Empower references the applicable state's requirements for Small Estate Affidavits to determine if the proper documentation was provided.• Empower may contact the Client to confirm small estate affidavit meets Plan requirements if needed.
Letter of Administration	<ul style="list-style-type: none">• May be granted to appoint appropriate people to deal with a decedent's estate if there are no living executors.• The letter designates someone as the executor, executrix, or personal representative with authority to handle affairs for the estate.• Empower reviews the document to confirm it was court issued in the decedent's name, contains a court seal or notary stamp if required, includes a TIN for the estate, and was signed by a Court Clerk.• Empower may contact the Client to confirm letter of administration meets Plan requirements if needed.
Guardian or Conservator Appointments	<ul style="list-style-type: none">• Used to appoint a party authorized to act on behalf of the beneficiary, including minors, and the extent of their authority.• Empower sends the appointment to the Client along with a form for the Client to confirm authorization granted to the guardian or conservator.

Documentation	Description
Trustee Acceptance of Appointment	<ul style="list-style-type: none"> Used to identify appointment of a trustee. Empower reviews the Trustee Acceptance of Appointment to confirm the following: <ul style="list-style-type: none"> The appointment was signed by the trustee That the name and signature of the appointed trustee matches the information provided on the Death Benefit Claim Request form NOTE: Empower issues payment to the trust in the trust's name. Empower does not pay benefit claims directly to the trustees or beneficiaries of the trust. Empower provides no interpretation of the trust or Trust Acceptance of Appointment

Processing Death Claims

Official notification of death is required before any claims can be processed. If official notification of death has not previously been submitted to Empower, claimants must include an original or certified copy of the death certificate along with the Death Benefit Claim Request form and any additional required documentation as applicable.

Empower reviews all Death Benefit Claim Request forms to verify the following information:

- Beneficiary identified on the Request Form matches the decedent's Beneficiary of Record as recorded on Empower Retirement's recordkeeping platform or as identified by the Plan Sponsor.
- If a married decedent designated a non-spousal beneficiary and spousal consent applies, verifies spousal consent is on file.
- If the supporting documentation is required, verifies documentation is complete and in good order.
- Information provided on the Request Form is otherwise complete and in good order.

Unless the Client provides an alternate marital status for a decedent, Empower relies solely on the marital status reflected on the death certificate.

If the Beneficiary Death Benefit Claim Request is deemed to be in good order, Empower processes the account payout to the designated beneficiary in the manner specified on the Death Benefit Claim Request form.

If the Death Benefit Claim Request is not deemed to be in good order, Empower notifies the requester. Communication may be sent via email, phone call, or mail.

Transferring Beneficiary Interest

Empower cannot systematically administer a per stirpes beneficiary designation for administrative reasons. If a per stirpes designation is on file and the beneficiary is deceased, the Client is responsible for directing Empower with regards to processing the deceased beneficiary's portion.

Disclaiming a Benefit

If allowed by the Plan, a beneficiary may waive their right to a benefit if certain conditions are met as prescribed by Internal Revenue Code (IRC) 2518. While the beneficiary can waive their interest, they cannot designate to whom that interest should be transferred to. If no other beneficiaries were designated, Empower handles the account according to the Client's direction.

Beneficiary Support Services

When dealing with the death of a participant, Empower provides support for Clients and claimants through a dedicated Beneficiary Support Services Team. If a beneficiary designation is in Empower's recordkeeping system or provided via a hard copy Beneficiary Designation form (if applicable), a

Beneficiary Support Services Team Representative may contact the beneficiary regarding the process for submitting a Death Benefit Claim Request form.

If Clients or claimants need to contact the Beneficiary Support Services Team, contact information is included on the Death Benefit Claim Request form and provided directly to Clients. The Beneficiary Support Services Team is generally available from 6 a.m. to 5 p.m. Mountain Time and callers are assigned a representative with whom to work. If unavailable or calling after hours, callers are directed to an answering service that schedules and coordinates a call back from the caller's assigned Beneficiary Support Services Representative, if desired.

Client Experience

Clients may download a copy of the Plan's Death Benefit Claim Request form from the Plan Service Center (PSC) to assist beneficiaries with the death claim process. Alternatively, Clients may refer beneficiaries to the Beneficiary Support Services Team for additional assistance as needed using the contact information provided on the form.

Death claim processing cannot begin until Empower receives official notification of death, typically an original or certified copy of the death certificate as outlined above. Clients may provide a copy of the death certificate to initiate the process or one may be included with a beneficiary's Death Benefit Claim Request form.

Death claim processes and standards described in this guide are designed to facilitate the practical processing of beneficiary death benefit claims, which can be performed by parties both unfamiliar with the participants, beneficiaries, and the Client's standards of judgment and discretion. It is expected that certain requests will be submitted which are not directly addressed by Empower's procedures and require Client intervention. In such cases, Empower refers the request to the Client for a determination.

Example scenarios requiring Client intervention may include but are not limited to:

- Decedent has no beneficiary on file.
- Decedent has no beneficiary on file and a Death Benefit Claim form is submitted by anyone other than the confirmed spouse or estate.
- Beneficiary dies before a valid death claim request can be processed.
- Claimants submit competing or questionable claims.
- Scenarios requiring additional documentation or direction as described above.
- Rejected claims requiring escalation or arbitration.

Participant Experience

Once official notification of death is received, beneficiaries receive notification informing them of the Takeover Account transfer and a copy of the Death Benefit Claim Request form to the owner of the Takeover Account informing them of what type of claim options exist.

To initiate a death claim request, beneficiaries must complete a Death Benefit Claim Request form. Beneficiaries may contact the Participant Services Center to request a copy of the form which may be mailed or emailed to a confirmed beneficiary of record.

Information required to complete the Death Benefit Claim Request form may vary according to Plan provisions but generally includes:

- The Decedent
- Themselves (Claimant)
- A minor claimant's representative (including relationship to the minor)
- Type of claim (for example, periodic payment of the claimant's share)
- How proceeds from the claim shall be delivered (for example, by mailed check or direct deposit)
- Federal and state income tax withholding selection (for example, to withhold or not)

Beneficiaries or other claimants must also provide the following information:

- Claimant's name
- Claimant's Social Security Number
- Claimant's date of birth

Beneficiaries may contact the Beneficiary Support Services Team for additional assistance as needed using the contact information provided on the form.

If the beneficiary does not file a death benefit claim, assets remain in the Takeover Account until a distribution or rollover is requested and no further attempts are made to contact the beneficiary. Depending on Plan provisions and/or other circumstances, beneficiaries may be subject to benefit payout timing requirements. See Required Minimum Distribution Processing section of this guide for additional information.

Beneficiaries with an active Takeover Account receive regular quarterly statements.

How it Works

Description	Responsible
Provides Notification of the Participant's Death	Client, Beneficiary, Other
<ul style="list-style-type: none">• Submits an original or certified copy of the death certificate (or other acceptable official notification of death as described above) to Empower.• Provides the decedent's name and as much additional decedent information as possible, including decedent's date of birth, date of death, and Social Security Number (SSN) or TIN.• Unless the Client provides an alternate marital status for a decedent, Empower relies solely on the marital status reflected on the death certificate	
Verifies Notification of Death and Decedent	Empower
<ul style="list-style-type: none">• Verifies the death certificate provided is an original or certified copy and was filed in the state where the death occurred.• Attempts to identify decedent's account in the recordkeeping system.• If the decedent cannot be identified in the recordkeeping system, contacts the notifying party to determine if more information is available that helps identify the decedent's account.• Once the decedent is verified, updates the decedent's account as follows:<ul style="list-style-type: none">– Adds participant's date of death.– Removes participant's online account access.– Places a disbursement hold on the account.– Terminates active periodic payments, if applicable.	

Description	Responsible
Identifies Beneficiaries	Empower
<ul style="list-style-type: none"> Reviews recordkeeping system and Beneficiary Designation form (if applicable) for beneficiary designations established by decedent. Reviews participant's marital status to determine spousal consent requirements. Verifies beneficiary designations meet the Plan's beneficiary spousal consent requirements as applicable. Contacts the Client for direction in the following scenarios: <ul style="list-style-type: none"> Spousal consent applies but no spousal consent is on file or the spousal consent does not align with the beneficiary designation. Participant account assets are subject to Qualified Pre-Retirement Survivor Annuity (QPSA) but spousal consent/waiver information is not on file. 	
Establishes Takeover Account and Sends Notification	Empower
<ul style="list-style-type: none"> Establishes a Takeover Account for each confirmed beneficiary of record. NOTE: Takeover Accounts may not be established if 100% of the account assets are to be distributed to a single beneficiary. Sends notification to all impacted beneficiaries, including a copy of the Death Benefit Claim Request form as described above. 	
Initiates Death Benefit Claim Request	Claimant
<ul style="list-style-type: none"> Completes the Death Benefit Claim Request form and submits to Empower as directed on the form. Includes all supporting documentation including an original or copy of the Decedent's death certificate if one has not already been provided to Empower. Additional documentation may be required depending on the type of beneficiary filing the request as described above. 	
Reviews Death Benefit Claim Request	Empower
<ul style="list-style-type: none"> Reviews the death claim request for good order status including but not limited to the following: <ul style="list-style-type: none"> Claimant is a confirmed beneficiary. Claimant information is complete and includes claimant name, claimant date of birth, and beneficiary SSN/TIN. Supporting documentation provided if applicable. NOTE: If the claimant information does not match beneficiary information, Empower may contact the Client for further direction. Claimants certify on the form, under penalty of perjury, that the information provided on the form, including that their SSN or TIN is correct. 	
Accepts or Rejects the Death Benefit Claim Request	Empower
<ul style="list-style-type: none"> If requests are not in good order, sends notification to Claimants requesting that they contact Empower to provide missing or corrected information. Claimants may be contacted via telephone (on a recorded line), email, and/or in writing via a Request For Additional Information letter. If a claim is rejected, Claimants may appeal a decision to the Client who provides direction to Empower on how to proceed. Once the request is in good order, if not already established, creates a Takeover Account for claimants and proceeds with processing the request. 	

Description	Responsible
Prepares to Process the Death Benefit Claim Request	Empower
<ul style="list-style-type: none"> If the Decedent set up <u>future payments</u> from the Plan, <ul style="list-style-type: none"> Periodic payments scheduled prior to the participant's death are paid as originally directed. Periodic payments scheduled after the participant's death are terminated and outstanding periodic payments are reversed (if paid out in the same tax year in which the participant died) and reissued to the appropriate claimant(s). If checks issued to the decedent remain uncashed: <ul style="list-style-type: none"> Issued before the participant's death, reissues the check paid to the decedent's estate. Issued after the participant's death, reissues the check paid to the beneficiary. If multiple beneficiaries, reissues the check to the beneficiaries according to the percentage of total benefits to which each beneficiary is entitled. If <u>defaulted loans</u> exist in the decedent's name, advises claimant as to how defaulted loans are addressed. If Plan provisions do not address how defaulted loans are handled upon the death of the participant, the standard procedure is to offset the defaulted loan under the decedent's SSN. 	
Processes the Death Benefit Request	Empower
<ul style="list-style-type: none"> Once the request is in good order and future payments, uncashed checks, and decedent loans are addressed, processes Death Benefit Claim Request forms received according to Plan provisions and as directed on the form without the Client's further approval. If a beneficiary is not identified or a death claim request is never received, assets remain in the Decedent's account unless and until: <ul style="list-style-type: none"> A beneficiary is identified and a death claim request is received in good order, or The Client provides further direction for handling. 	
Issues Tax Forms	Empower
Sends applicable tax forms to claimant(s) in the year following the distribution.	

QDRO Processing

Overview

Qualified Domestic Relations Order (QDRO) review and preparation responsibilities are delegated to a QDRO Consultant who is a third-party provider specializing in the review, interpretation, and qualification of Domestic Relations Orders (DROs).

NOTE: Clients must execute third-party authorization allowing Empower to release information to QDRO Consultants and is responsible to ensure the information provided below accurately reflects the services being provided by QDRO Consultants.

Participant Experience

Participants or the Client may contact Empower to provide notification of a divorce. Empower works with the QDRO Consultant to provide support for participants throughout the QDRO process. QDRO consultants are responsible for reviewing, interpreting, qualifying DROs, and providing account segregation instructions to Empower for processing. Additional QDRO processing fees may apply.

How it Works

Description	Responsible
Completes QDRO Review and Preparation Activities	QDRO Consultant
<ul style="list-style-type: none">• Sends QDRO procedures to all parties.• Directs Empower to place a hold on the participant's account(s) to prevent distributions, withdrawals, or loans from the account(s).• Distributes model QDRO language, if necessary.• Conducts all oral and/or written correspondence with the parties and their attorneys.• Reviews the terms and provisions of the QDRO in accordance with federal law and specific plan provisions.• Prepares and distributes approval or denial letters to all parties.• Reviews any and all amended QDROs to correct deficiencies in prior orders.• Distributes a QDRO Interpretation letter once the QDRO has been deemed qualified.• Instructs Empower to remove the hold on the participant's account and directs how to split the participant's assets with the alternate payee using the required segregation instruction form.	
Provides Account Information/Update Accounts	Empower
<ul style="list-style-type: none">• Works directly with the plan's designated QDRO contact to verify and/or provide basic participant information needed for processing.• Places a distribution hold on participant's account(s) as directed by the plan's QDRO contact.• Once the QDRO contact indicates the QDRO has been approved, creates a Takeover Account for the alternate payee, if applicable, and prepares to split the participant's assets according to segregation instruction form provided.	
Confirms and Completes Transaction	Empower
<ul style="list-style-type: none">• Prior to completion of the account split, sends correspondence to both the participant and alternate payee advising them that the transaction will be completed.• The alternate payee letter also includes confirmation of the separate account creation, information on account access, and contact information should they have questions or need more details.• Removes the distribution hold from the participant's account and processes the distribution to the alternate payee.	

Uncashed Checks

Overview

When a distribution from a retirement account is processed, a check is mailed to the payee's address of record (AOR). Examples of a payee include participants, alternate payee or beneficiary, or a rollover institution.

Checks issued by Empower are generally valid for six months (180 days) from the date of issue. Uncashed checks are considered either of the following:

- Active checks returned without a forwarding address.
- Checks neither cashed nor deposited within 180 days of the date of issue.

Semi-annually, the Client directs Empower to issue a stop payment for all uncashed checks older than 180 days. When funds are redeposited into the plan, the Client determines the handling of such amounts under the terms of the plan and the determination of lost participants.

Notification of Stale-Dated Check

If a check remains uncashed for 180 days from the date of issue, Empower mails a Notice for Stale-Dated Checks to the payee's AOR.

The stale-dated check notice:

- Informs the payee that they have an uncashed check.
- Requests the payee to contact a Participant Services Representative to request the check be reissued within 30 days.
- Informs the payee of how the funds are managed if no response is received.

Action Based on Response

Empower takes the following action based on whether or not the payee responds to the Notice for Stale-dated Checks.

Response	Description
Response Received	<ul style="list-style-type: none">• When the payee requests a reissue, Empower reissues the check to the payee.• The payee receives a reissued check approximately 30 days from the request date.
No Response Received	Depending on plan direction, Empower does one of the following: <ul style="list-style-type: none">• Redeposits the funds into the plan's Unclaimed Property Account (UCP)• Remits funds to the payee's state of residence as unclaimed property (Escheatment) per state requirements and dormancy periods.
Returned Undeliverable	<ul style="list-style-type: none">• Empower conducts an address locator search.• If a new address is located, the notice is resent.• If no new address is identified, a mail hold is placed on the participant's account and the funds are redeposited into the plan's Unclaimed Property Account (UCP) or remitted to the payee's state of residence as unclaimed property (Escheatment) based on plan direction.

NOTE: Each state's Unclaimed Property Laws require that Empower send written notice to the apparent owner's last known address stating that the property is being held and may be turned over to the State Treasurer of the state, which they reside.

Client Experience

Monthly, Empower generates a PDI Return Mail report and provides it to the Client. This report identifies participants with a new address identified during the address locator search.

Client uses the report to update their payroll file with the new addresses included on the report. Once the next payroll file is submitted:

- Participants' addresses are updated in the recordkeeping system.
- Any mail holds are systematically removed from impacted participants' accounts.

NOTE: When a new address is identified for a terminated participant, Empower updates the recordkeeping system with the new address. These participant records may display on the report with a blank current address and a blank new address.

Participant Experience

Active participants must manage address changes through the Client. The Client must transmit the current address to Empower via their payroll file.

Terminated participants, beneficiaries, retirees, etc. may contact the Participant Service Center to manage address changes or complete and submit a Personal Information Change Request form to Empower. This form is available to download from the participant's online account.

NOTE: Participants contact their specific State Treasury's Department (or make a claim online via the State Treasury's Unclaimed Property website) of the payee's last known address at the time when payment was issued.

How it Works

Description	Responsible
Notifies Payees of Stale-Dated Checks	Empower
<ul style="list-style-type: none">• For any issued check that remains uncashed at 180 days, generates and mails Notice for Stale-Dated Checks to the payee's AOR, including instructions to contact the Participant Services Center to request the check be reissued.• Semi-annually, identifies all uncashed checks outstanding for 180 days or more and issues stop payments.	
Researches Returned Notices Due to Incorrect Address	Empower
<ul style="list-style-type: none">• If a forwarding address was provided, resends Notice for Stale-Dated Checks to payees.• If no forwarding address provided, conducts an address locator search.• If new address found, resends Notice for Stale-Dated Checks to payees.• If new address is not identified, places a mail hold on the participant's account.	
Request Check Reissue	Payee
Contact a Participant Services Representative to be validated and request that the check be reissued.	
Reissues Check to Payee	Empower
<ul style="list-style-type: none">• Reissues check to payee as requested after validation complete.• The payee receives a reissued check approximately 30 days from the date the request is received.	
Redeposits Funds into Plan's UCP or Escheats	Empower
If the payee does not respond to the Notice for Stale-Dated Checks or the notice could not be delivered to the payee, redeposits uncashed check funds into the plan's UCP account or escheats funds to the payee's state of residence— as directed by the plan.	