

Benefit Payment Services

Service Guideline and Description

July 2016

Benefit Payment Services

Built on experience gained since 1965, Northern Trust's Benefit Payment Services group offers exceptional client service and a flexible system. We know the industry and the pace of change to which you must respond, and we offer the specialized services you will need to succeed. Our expertise is evident in the volumes we handle: we issue more than 1.7 million pension distributions and 90,000 savings plan distributions each month; over 2.2 million tax forms are produced each year.

As a client of Benefit Payment Services, you should be aware of the operating procedures and requirements for the service. This guide is a reference manual intended to contain a service description and benefit payment procedural guidelines. Review this document carefully. In order to provide Benefit Payment services to our clients in a timely and consistent manner, and at a reasonable cost, some degree of standardization is necessary. We encourage you to subscribe to these standard procedures. Nonstandard, specialized procedures may involve additional cost.

The enclosed material provides detailed information concerning the standard procedures for Benefit Payment Services as well as the expectations we have of you. Your continued use of Benefit Payment Services constitutes your acknowledgement that these guidelines will govern the manner in which Northern Trust provides the service.

The Benefit Payment Services Organization

Benefit Payment Services, or “Benefit Payments,” is part of Northern Trust’s Operations and Technology Group. It is structured as a business unit. As such, Benefit Payment management leads a multi-functional staff (known as “Partners”) to provide our clients with a number of services. Benefit Payments Partners work together to make the delivery of services efficient and accurate.

You may interact with any of three functional groups within Benefit Payments. These are:

1. Client Service Team
2. Participant Service Team
3. Implementations Team

Client Service Teams

A Client Service Team will be your main contact. Your Client Service Team (CSR Team) will be comprised of a Team Leader, Senior Client Service Representatives, and Client Service Representatives. The Client Service Team acts as a liaison with your pension teams and recordkeeper and any other agents supporting your benefit payment plans.

The CSR Team Mission

The assigned CSR Team will be familiar with the structure of your benefit payment plans. Partners on the CSR Team will handle your phone calls and correspondence, see that payment requests are processed accurately and timely, and make sure that your various payment plans are balanced and in good working order. The CSR Team will be available every business day, from 8:30 a.m. to 5:00 p.m., Central Time. Additionally, Client Service Team voice mail is available on bank holidays and outside normal business hours.

The PSR Team

The PSR Team performs a number of functions depending on the participant servicing you have requested of Benefit Payments. In the standard service, the PSR team receives and handles participant phone calls and letters; performs participant database updates such as address changes, stop payments, Tax Change requests and other data entry; distributes printed reports; and performs “callbacks” for high-dollar benefit payment requests. Address Changes and Tax Changes can now be completed via telephone request after appropriate participant security verification has been established.

Implementations Team

The Benefit Payments Implementations Team will work with you to facilitate transitions of all types. “Transitions” might include adding a new payment plan from a prior trustee to Northern Trust or adding/revising a recordkeeper relationship. If the interface with Benefit Payments is to be via electronic transmission, the Implementations Team will work with the necessary parties to test the new communication mechanism to facilitate uninterrupted quality service.

Disclosures and Limitations

Benefit Payment Float

The funds associated with all Outstanding Checks will be held in the checking account from which they were originally issued. “Use of Funds”, or the value of the “float” earned on the balance in the Outstanding Checks account will be retained by Benefit Payments as part of its compensation.

Late Payments/Late Payment Delivery and Missed Investment Opportunities

Benefit Payments will not be responsible for missed investment opportunities if an error is made resulting in a delayed payment or in delayed payment delivery. Benefit Payments shall have no liability in the event that a payment is delayed as a result of delivery problems encountered by the U.S. or Canadian Mail or any third party delivery service used in the normal course of conducting business.

Tax Rebates (U.S. Plans Only)

Benefit Payments may receive tax rebates from individual states as an incentive to deposit withholdings from participants’ payments on time. Benefit Payments retains these rebates as part of its compensation, which helps to keep Benefit Payment fees at reasonable levels.

Canadian ACH (U.S. Plans Only)

Northern Trust will provide electronic deposit service to Canadian benefit payment recipients by utilizing its correspondent banking relationships in Canada. This service differs from the U.S. domestic ACH service. You acknowledge that if you choose to use the Canadian electronic deposit service, the element of foreign exchange (U.S. Dollars converting to Canadian Dollars) adds complexity, and that ACH reversals, reclamations, returns and trace operations are lengthy and sometimes not possible. Benefit Payment Services shall have no liability in the event that a payment or payment return is delayed as a result of Canadian electronic deposit services.

Timely Notification of Errors

Errors in Reports and Statements

You or your recordkeeper will reasonably attempt to notify Benefit Payments within 15 calendar days of the discovery of any discrepancies or errors noted in the Services. For clarity, this does not imply or mean that if Benefit Payments is notified within 15 calendar days, it will always be able to resolve discrepancies immediately, nor should it imply that after 15 calendar days Benefit Payments will not address the discrepancies or concerns in a reasonable and professional manner. We simply ask that you review reports and advices promptly and contact us promptly with questions, so we are able to provide you with the professional client service you expect from Northern Trust.

Payment Direction – Authorization and Deadlines

You will direct Benefit Payments to distribute funds to plan participants and plan beneficiaries. You may, solely at your discretion, alternatively grant payment direction authority to a recordkeeper.

Use of Recordkeepers; Recordkeeper Delegation Letter

Where payment authority is granted to a recordkeeper, you must execute a “Delegation Letter.”

This letter outlines the specific authority granted, and allows Benefit Payments to accept payment and withholding direction from the designated recordkeeper on your behalf.

Because Northern Trust will follow their directions, you will hold your recordkeeper accountable to provide accurate and complete information about your participants at the time of initial payment direction. In addition, you will hold your recordkeeper accountable to apprise Benefit Payments of changes to this information, as appropriate, and in a timely manner.

The recordkeeper's responsibilities depend upon the specific authority you delegate to them. In general, however, it is typical that the recordkeeper will:

- Calculate plan participants' payment distribution amounts.
- Direct Benefit Payments as to the payment amounts, the funding source(s) for those payments, and the deduction amounts, including complete tax information that should be withheld from the gross payments.
- Verify that proper and accurate distributions were made to participants.
- Ensure that Benefit Payments' files are maintained by notifying Benefit Payments within 15 calendar days of participants' payment or demographic changes.

Because you have delegated authority to a recordkeeper, Benefit Payments will conclusively rely on said recordkeeper. Benefit Payments will not be responsible for your recordkeeper's errors.

Benefit Payments Authorization Form

Benefit Payments will not accept "paper" instructions from anyone other than an authorized person that you appointed. If Benefit Payments works directly with you, the Client Service Team will review the name on paper payment request forms to confirm that this name is listed on your "Benefit Payments Authorization Form." You must ensure that your "Benefit Payments Authorization Form" is current at all times.

If Benefit Payments works directly with your recordkeeper, and your recordkeeper communicates with Benefit Payments via "paper" instruction, the Client Service Team will review the name on the paper payment request forms to confirm that this name is a known contact at the recordkeeper's facility.

Callbacks

Benefit Payments employs controls to ensure appropriate payment direction. One such control is the "callback". Benefit Payments may initiate a "callback" to you or to your recordkeeper when a high-dollar payment (for Periodic payments the high dollar threshold is \$10,000 and lump sum is \$150,000) is requested via paper form. When Benefit Payments initiates a "callback," ensure that an authorized person, *preferably other than the initiator of the request*, is available to accept the call. Without secondary authorization, Benefit Payments will delay the payment request(s) until the callback is completed.

Daily Deadlines

Benefit Payments has established "Daily Deadlines" to set your expectations and to allow payment directions to be effected on the day you intend them to be. You or your recordkeeper must adhere to the established "Daily Deadlines", which are listed below.

	<u>U.S.</u>	<u>Canada</u>
Transmission Files Sent to Northern Trust	2 Business Days Prior to Issue Date (see processing calendar)	2 Business Days Prior to Issue Date (see processing calendar)
Transmission Approval	By 3pm CT	By 4pm ET

Manual Input (Approved) into BPP*	By 6pm CT	By 7pm ET
EFT Reversals	By 1pm CT	By 2pm ET
Refund of taxes	By 1pm CT	By 2pm ET
Stop Payments	Any given business day – 24 hour confirmation	Any given business day – 24 hour confirmation
Same Day Payments	Any given business day – Direction received by 1pm CT	Any given business day – Direction received by 11am ET

*BPP is the Northern Trust Benefit Payments Passport® system.

Bank Holidays

Benefit Payments is closed for business on U.S. Bank Holidays when the Federal Reserve System is closed. Payments will be processed on the following business day. On Canadian Bank Holidays, payments will be processed on the following business day. On Bank Holidays, Benefit Payments phone message systems will provide holiday closing information, and will allow callers to leave voice messages.

Bank Holidays that will be observed are:

U. S. Holidays

New Year's Day
Martin Luther King Day

President's Day
Memorial Day
Independence Day
Labor Day
Columbus Day
Veteran's Day
Thanksgiving Day
Christmas Day

Canada Holidays

New Year's Day
Easter (includes Good Friday and Easter Monday**)

Victoria Day
Canada Day
Civic Holiday
Labour Day
Thanksgiving
Remembrance Day
Christmas Day
Boxing Day

** Northern Trust is open on Easter Monday for services

Payment Direction – Methods of Payment Direction

You or your recordkeeper may provide payment direction information via electronic transmission, paper forms, or Northern Trust Benefit Payment Passport® (“BPP”).

♦For clarity, emailed directions will not be accepted by Northern Trust.

Electronic Transmission

Benefit Payment Services will provide file specifications which specify which data must be included and in which fields the data must be placed. The Implementations Team will work with you and your recordkeeper to test electronic files for consistency with file specifications prior to service commencement.

Paper Forms

The amount and type of information needed to effect a payment depends on the type of benefit payment being disbursed. Benefit Payments will provide forms that detail the information needed. A person listed on the “Benefit Payments Authorization Form” must sign paper forms. You acknowledge that if the information Benefit Payments receives is inaccurate or incomplete, there will be a delay in processing.

Northern Trust Benefit Payment Passport®

Northern Trust Benefit Payment Passport® (BPP) will guide the user through data entry, indicating which fields are mandatory and providing guidelines via drop-down lists about the type of information needed. A comprehensive “help” function is available online.

BPP will also enable users to inquire online about payment status, payment history, and all demographic data including address for your participants. Users will also be able to perform stop payments as well as payment reissues.

Types of Benefit Payments

Future-Dated Payments

Benefit Payments is able to accept payment instructions for any business day, up to 49 years in the future, when clients use the BPP product. Future-dated service is not available via manual paper form payment requests.

Lump Sum Payments

One-time distributions and other non-periodic payments are often referred to as lump sum payments. Benefit Payments will maintain the ability to issue lump sum payments on any business day. Generally, one-time payments will be issued on a next business-day basis.

Rollover/Transfer Payments

Rollover/transfer payments are one-time payments that can be sent to lump sum payment plan participants or appropriate financial institution via paper check, EFT, or Fed Wire (U.S. only). It is possible to issue several payments from a single record. For example, a direct payment to the participant and payments to two rollover institutions can be made, if desired. Rollover/transfer payments are always payable to a designated financial institution *on behalf of* a participant.

Periodic Payments; Periodic Payment Cycles

Benefit Payments issues monthly recurring payments (known as periodic payments) for you by paper check or EFT on the first, fifteenth, and last business day of the month. Quarterly, semi-annual, and annual periodic payments cycles are also available. If there is a need to issue monthly recurring payments on a payment cycle not previously mentioned, you or your recordkeeper should work with your Client Service Representative to establish a custom payment cycle.

Retroactive Payments

Benefit Payments will maintain the flexibility to issue both on-cycle and off-cycle payments for participants in periodic benefit payment plans. For example, retroactive payments can be made without altering existing participants' periodic payment data. Retroactive payments are issued separately from the next periodic payment for the participants.

Same-Day Payments

If required, a payment can be issued on the same day Benefit Payments receives the payment request, as long as the request is received early enough in the day to allow for processing (times are as noted in Daily Deadlines). There must be sufficient funds in the trust account(s) to generate a same-day payment, as the debit will occur directly from the account on the day the payment is generated. The payment can be sent via check or wire. Same-day payments require manual processing, and therefore these transactions will be charged at the wire rate. Same-day checks will not appear on the Outstanding Check Report. They will appear on the Monthly Activity Reports and in the Benefit Payments history files as history adjustments.

QDRO

A QDRO/Garnishee (Canada) or Qualified Domestic Relations Order, is a court order that mandates an assignment of particular benefit payments to satisfy a domestic relation's obligation such as alimony or child support. A QDRO/Garnishee Payment can be established as either a deduction from a periodic payment, or as a separate periodic payment or lump sum. As a deduction from a periodic payment, the QDRO/Garnishee Payment will be deducted from a participant's routine payment and sent via paper check or EFT to the appropriate recipient. The recipient will be established as a separate participant if the payment is set up as a separate periodic payment or lump sum.

Upon a marriage breakdown (Canada plans), a court order will be received from the courts informing the trustee of a marriage breakdown and will advise the trustee of the date the marriage was dissolved and how the funds should be split and to whom they should be paid.

Tax Levies

Tax levies are orders from the Internal Revenue Service (IRS) or the Canada Revenue Agency (CRA) to collect tax obligations from a plan participant. Tax Levy Payments are similar to QDRO Payments, except that these are always attached as a deduction to a periodic payment. Benefit Payments only acts upon Tax Levy requests for which we are the third party pension payer.

Two types of tax levies exist for the U.S.:

Form 668-W(c) (U.S. Plans Only)

A 668-W(c) Tax Levy requests installment payments from a periodic payment plan participant. When a 668-W(c) is received from the IRS, Benefit Payments will send a letter to the participant requesting his or her filing status and number of exemptions. This information is needed to calculate the appropriate tax levy amount. Benefit Payments will also notify you or your recordkeeper of this action by sending a copy of the IRS Tax Levy request and a copy of the letter to the participant.

Benefit Payments allows the participant 10 days to respond to this letter. If the participant does not respond within 10 days, Benefit Payments will apply the highest possible tax levy amount, as a deduction, to the participant's periodic payment. The new IRS deduction will take effect at the next payment cycle. A participant's tax levy deduction will generate a separate payment to the IRS.

Form 668-A(c) (U.S. Plans Only)

A 668-A(c) Tax Levy requests a whole dollar amount, as opposed to a deduction from a periodic participant. When the 668-A(c) is received, and if Benefit Payments confirms that the participant is receiving periodic benefit payments, then Benefit Payments will return the 668-A(c) to the IRS indicating that a 668-W(c) must be received. Benefit Payments will also notify you or your recordkeeper of this action by sending a copy of the IRS Tax Levy request and a copy of Benefit Payments response letter to the IRS.

A letter titled "Requirement to Pay" is received from the CRA requiring the trustee to deduct and remit a specific percentage from each distribution up to a specified maximum amount. Should the participant exist in multiple benefit plans, Northern Trust will withhold the required amount from the largest gross amount.

Payment Distribution

Benefit Payment Services issues payments either via ACH/EFT, paper check or wire transfer.

ACH Payments (U.S. Plans Only)

Northern Trust is a member of the National Automated Clearing House Association ("NACHA"), and can make direct deposits of electronic payments to any United States bank that is a member of NACHA. Certain Canadian banks can also receive electronic payments, though this service differs somewhat from the U.S. ACH service.

ACH service for the participant(s) will commence immediately upon approval of the EFT information into BPP. Northern Trust sends the ACH information to the Receiving Institution for their review on the following business day. The Receiving Institution then provides any applicable adjustments or revisions which are then applied to the participants' records. However, a payment disbursed prior to the receipt of any adjustments or revisions will still be sent via ACH to the Receiving Institution.

ACH/EFT Advices (Both U.S. and Canada Plans)

An ACH/EFT advice can be mailed to the ACH/EFT payment recipients. This advice provides valuable detail about the payment and deductions, as well as current and year-to-date payment and deduction information.

Paper Checks

For all paper checks, Benefit Payments uses fine-quality, watermarked check stock designed to provide both comprehensive participant information and state-of-the-art security features. Paper checks will be printed on a full 8 1/2 x 11 perforated sheet of paper. A special folding technique will be utilized to disguise the appearance of an inserted check in the mailing envelope, providing an additional level of security.

In addition to current payment and deduction information, year-to-date payment and deduction information will be included on every check stub.

U.S. Check Stock – Standard

Each check/EFT advice includes an address change form, and an *Electronic Funds Transfer Form* (also known as an ACH Form.) For periodic checks, Northern Trust's Benefit Payment check stock will also include a TEFRA (Tax Equity and Fiscal Responsibility Act--1982) notification, alerting the participant that he/she may change the federal and/or state tax withholding election if desired. The stub portion will reflect the current withholding elections and allow the participant to submit an update to those elections.

Canada Cheques Stock – Standard

Each cheque/EFT advice includes an address change form. For EFT directions, participants are directed to send written instructions accompanied by a voided cheque. For updates to their withholding elections, participants are directed to send a completed TD1 form. A statement at the top of the stub directs participants where to send their changes.

Check Messages

For an additional fee, an Important Notes Section is provided on each payment form. This allows you or your recordkeeper to communicate information to plan participants, using up to 20 lines of 50 characters each. The Benefit Payments CSR Team will assist in the use of this feature.

Client Logo

In addition, and for an additional fee, your company logo can appear on Benefit Payment checks and EFT advices. Contact your CSR team if you are interested in using your company logo.

“Pull” Checks

Once the paper check is directed to print, it cannot be removed from the payment production process. That is, Benefit Payments will not be able to pull the check and keep it from being mailed. However if it is known prior to being issued that a check will need to be pulled, the special handling instructions can be communicated via the electronic transmission file or entered online via BPP for action by Benefit Payments.

Wire Transfers

Wire Transfers (also known as Fed Wire Transfers or Fed Wires) will be sent on a same-day basis if instruction is received by Benefit Payments by 2:00PM Central Time (U.S. Plans) and 11am Eastern Time (Canada Plans). A link between Benefit Payments and the Electronic Banking Services Division at Northern Trust will be maintained to facilitate this method of payment if you or your recordkeeper choose this option (U.S.). The Wire Transfer method of payment distribution is only available for one-time, non-periodic payments, i.e. lump sum payments (U.S.). Wire Transfers require non-routine processing and therefore, additional costs for these will be assessed.

Payment Delivery Options

Paper checks will be mailed to the participant's home address. ACH/EFT advices will also be mailed to the participant's home address. To help ensure that payment plan participants receive paper checks and ACH/EFT advices on time, Benefit Payments will produce and mail them several days in advance of the payable date using the United States Postal Service and Canadian Postal Service respectively.

Postage

Postage expense incurred by Benefit Payments in servicing the participants will be directly charged to you at the then-current first class (U.S.) and domestic letter (Canada) postage-mailing rate. This includes but is not limited to checks, ACH/EFT advices, general participant communication, required annual and participant-requested tax forms/slips.

Overnight and Same-Day Delivery Options

If a situation is urgent, Benefit Payments can, upon written request, ship checks and/or other material to your office, or to your recordkeeper's office, or to a participant, via special messenger or overnight courier. When this occurs, an additional fee will be charged which includes the fee associated with the shipment, as well as

handling charges. We ask that you request this service *only* when there is an urgent need, as it involves considerable additional time, effort, and expense for both you and Benefit Payments.

Payment/Participant Maintenance

Maintenance is critical to ensure participants are properly serviced. Be sure to advise Benefit Payments if a participant's address changes, for example, or if any demographic or financial information that Benefit Payments maintains should be revised.

ACH "Automatic" Payment Maintenance (U.S. Plans)

If Benefit Payments receives information from the Receiving Institution advising us to revise an account number, the financial institution's routing number, or another banking change, these will be applied automatically to the participant's EFT information. A participant confirmation letter (PCL) will be sent to the participant's current home address, notifying him or her of any EFT changes processed by Northern Trust.

EFT Payment Maintenance (Canada Plans)

If Benefit Payments receives information back from the Receiving Institution advising us to revise an account number, the financial institution's transit/routing/bank number, or a similar banking change, Benefit Payments will notify you or your recordkeeper of the change for participant follow-up.

ACH/EFT Returns

If an ACH/EFT payment is returned to Northern Trust because the Receiving Institution is unable to apply the payment for a "miscellaneous" reason: 1) for the U.S. participants, Benefit Payments will revise the participant's payment distribution method from "ACH"/ "EFT" to "paper," and begin mailing paper checks to the participant's home address, 2) for Canada, Benefit Payments will advise your recordkeeper, and your recordkeeper will be responsible to determine and advise Benefit Payments how and where to send the funds. If the Receiving Institution returns the payment indicating the participant is deceased, Benefit Payments (U.S.) will notify you and/or your recordkeeper. For Canada, we will advise your recordkeeper, and your recordkeeper will terminate the participant on the next transmission file and will also advise Benefit Payments to proceed with the returned EFT payment, i.e. redeposit and reverse the payment.

ACH/EFT Reversal and ACH/EFT Reclamation (U.S.)

If an electronic (ACH) benefit payment has been issued in error, Benefit Payments can, if instructed, ask the Receiving Institution to return the funds. This is most successful if the ACH/EFT was issued less than five days before the return is requested. After five days, a return can still be requested but this involves manual processes and may require additional time. If a periodic participant has died and was not entitled to the ACH benefit payment, you or your recordkeeper must instruct Benefit Payments to reclaim the funds. Canadian banks require additional time to return funds, and that the exchange rate between U.S. dollars and Canadian Dollars will often alter the amount of the original deposit. In either case, the Receiving Institution returns the funds at its discretion and will only return funds if there is a sufficient balance in the account.

EFT Reversal and EFT Reclamation Reversal:

If an electronic (EFT) benefit payment has been issued in error or a participant has died, Benefit Payments will, if instructed by you or your recordkeeper, ask the Receiving Institution to return the funds. This is most successful if the request was made no later than the day prior to pay date by 12:00pm CT. After 12:00pm CT, Benefit Payments will attempt to retrieve the funds on best effort basis. You acknowledge that this will be a manual process and can require additional time. In either case, the Receiving Institution returns the funds at its discretion and will only return funds if there is a sufficient balance in the account.

ACH/EFT Solicitation Letters

The ACH/EFT payment method is very efficient, and because of this, you may wish to increase the number of ACH/EFT participants in your benefit payment plan(s). In fact, if paper checks frequently take too long to arrive at a particular plan participant's home, the PSR Team may recommend to the participant that the check be converted to an ACH/EFT payment.

ACH/EFT Trace

An ACH/EFT Trace is performed when Benefit Payments is notified by you, your recordkeeper or the participant that an ACH/EFT Benefit Payment was not successfully posted in the specified account at the designated Receiving Institution. Benefit Payments will perform the required research to determine that the money was received or rejected by that Receiving Institution, and if rejected, determine why it was rejected. Further, Benefit Payments will take necessary corrective action for the current payment and any future payment, advising you or your recordkeeper of issues out of its span of control.

Address Changes

As a security precaution, Benefit Payment Services will not accept address changes from anyone other than your authorized Representatives, your recordkeeper's authorized representative or the participant (if Benefit Payments has been instructed by you to accept participant-requested changes). In order to improve participant customer service and reduce the amount of paper that is exchanged, Benefit Payment Services will begin accepting address changes over the phone. Participants will need to provide identifying information prior to being able to conduct maintenance transactions on recorded phone lines. Participants will also continue to have the choice to complete these maintenance transactions via written instruction or via the Benefit Payment Participant Web Passport product for those clients who have elected to allow their participants to use this service.

Written instructions are completed by submitting an address change form to the Pension Service Center. An address change form is part of the paper check stub and ACH/EFT advice, which is received with each payment. A participant confirmation letter (PCL) will be sent to the participant's address of record prior to the change, notifying him or her of any address changes processed by Northern Trust whether the request was initiated via phone, paper or web.

Address-Related Changes

Benefit Payment Services employs federally-approved zip code/postal code and address correction software to verify participant addresses in both Canada and the U.S. For example, if Benefit Payment records indicate "123 Park Avenue," as a participant street address, but the address correction software tells us that "Avenue" should be abbreviated to "AVE," Benefit Payments will change it accordingly.

Benefit Payments will not “automatically” make more substantive address-related changes. For example, for the U.S., if the participant moves from one state to another, and changes his or her address, Benefit Payments will not automatically revise the state tax withholding to reflect the address in the new state. Participants often maintain more than one address, and Benefit Payments cannot know for certain which state is the primary residence without notification that the address change is permanent. For Canada, if the participant moves from one province to another, and changes his or her address, Benefit Payments will revise the provincial tax withholding to reflect the new address. If one participant is receiving a benefit from multiple Benefit Payment plans, your recordkeeper will be responsible to send an address change record for every plan to which that participant belongs. Benefit Payments will not automatically update every plan to which the participant belongs when an address change is entered in only one plan. If tax withholding needs revision; Benefit Payments must be expressly told to do so by you or your recordkeeper.

If a participant is in one of the Canadian plans he/she will be instructed to submit a TD1 to the Pension Service Center for processing.

Death Notification

You or your recordkeeper must immediately notify Benefit Payments if a periodic payment plan participant dies, and advise Benefit Payments to terminate the deceased participant’s periodic payment in every plan to which the participant belongs. Without this notification, Benefit Payment Services will continue to pay the participant, resulting in overpayment.

For the U.S., if Benefit Payments is notified by a participant’s relative *via phone* that a participant has died, we will refer the caller to an authorized contact at your or your recordkeeper’s office so that appropriate action may be taken. If Benefit Payments is notified by a participant’s relative or friend *in writing* that a participant has died, we will forward the documentation to you or your recordkeeper via weekly client mail. If the participant’s relative or friend provides a death certificate, Benefit Payments will cease periodic payments to that participant and notify you or your recordkeeper of the situation.

For Canada, if Benefit Payments is notified by a participant’s relative *via phone* that a participant has died, Benefit Payments will take all pertinent information and pass it on to you or your recordkeeper for follow up. Benefit Payments will not take any action unless your recordkeeper advises Benefit Payments to do so. If Benefit Payments is notified by a participant’s relative or friend *in writing* that a participant has died, we will forward the documents to you or your recordkeeper and wait for further instructions.

Death Searches (U.S. Plans Only)

To identify deceased participants and to assist in updating both your and our participant records, Benefit Payments annually prepares an electronic file of participant social security numbers and sends it to a vendor who will compare it to governmental agencies’ records of deceased individuals. When the comparison is complete, Benefit Payments will submit the information with allegedly deceased individuals to you for direction. This service will be provided annually, generally in the third quarter, free of charge. For death searches more frequent than annually, please work with your CSR Team to establish an off-cycle frequency. If you require additional information such as death certificates, Benefit Payments will refer you to the suggested vendor(s) for these services.

“Mass” Changes

You or your recordkeeper should notify Benefit Payments at least 60 days in advance of mass changes to the benefit payment plans. Examples of mass changes include a Cost Of Living Ajustment, (COLA) and insurance or other deduction amounts that are scheduled to change. If a significant number of changes, or if

changes are scheduled for January 1st, Benefit Payments should be notified 90 days in advance, to allow for efficient management of the possible extraordinary effort involved. Even if the notifications are not received within these timeframes, Benefit Payments will make reasonable efforts to achieve the changes in accordance with the communicated deadlines.

Miscellaneous Deductions

Miscellaneous deduction amounts, other than taxes, can be withheld from participants' distributions. For example, medical insurance premiums can be withheld from one or all of a periodic payment plan's participants; or the requirement may exist that a loan fee (U.S. only) be withheld from a particular non-periodic participant's payment. If so, Benefit Payments will withhold the appropriate deduction when the payment is disbursed, and remit a separate payment for the total amount of the withholding to the recipient of your choice. The deduction payment will be accompanied by a report detailing the participants who had deductions withheld.

Your or your recordkeeper's instruction to deduct miscellaneous amounts from a benefit payment will constitute your representation and warranty that the participant has authorized the deduction, and that the amount is permitted under 401(a)(13) of the Internal Revenue Code (U.S. plans), which relates to the assignment of benefits.

Miscellaneous deduction checks payable to you or your vendor(s) that have not been presented to Benefit Payments for payment after 60 days will be listed on The *Outstanding Vendor Check Report*.

Participant-Requested Changes

You must establish the service model you prefer for participant servicing with Benefit Payments. There are presently two service models available: Standard and Non-Standard.

Standard Participant Service Model

Under the Standard Service Model, Benefit Payments will accept change requests directly from the participants. In this model, Benefit Payments will provide participants with the following services at their direct request:

- Stop Payment/Reissue (see Stop Payments Section).
- Check Photocopies
- Address change (see Address Changes Section).
- Payment method change (usually from paper check to ACH)
- Tax withholding change
- Tax form request or duplicate tax form request

In cases where Benefit Payments accepts change requests directly from the participants, Benefit Payments may need to occasionally refer them to you or your recordkeeper. Examples of this include participant calls to question benefit amounts or verbal reports of a death.

Non-Standard Participant Service Model

If you choose the Non-Standard Service Model, where you ask that we do not accept participant change requests, we will refer participant phone calls and letters to you or to your recordkeeper.

In either case, Benefit Payments will forward address changes and miscellaneous requests received from the participants.

Participant Transfer

If there is a need to move a benefit payment participant from one payment plan to another, or if a participant I.D. needs revision because of a set-up error, you or your recordkeeper will contact the CSR Team for assistance. This process requires moving payment history, which will be managed and monitored by Benefit Payments.

Photocopies of Checks

Benefit Payments will provide photocopies/images of checks upon request, but only if the check is less than seven years old. Photocopies will typically be produced and sent within 5 business days. Check images are available via BPP (U.S. plans only) within 120 days of the paid date.

Opening a Benefit Payment Plan

A Benefit Payment Plan is a three to five character alphanumeric code used to categorize and group participants and payments by type (periodic, lump sum, loan, etc.), periodic payment disbursement schedule (monthly, quarterly, annually, or semi-annually) and tax reporting (1099R, W2, T4A, RL2, etc.). A plan can sometimes be used to group participants and payments, such as using your subsidiary or division names like “Chicago, IL Plan” or “The Hourly Plan.” A plan must be established and opened before a participant payment can be generated. If there is a need to open a new Benefit Payment Plan, the CSR Team will work with the Northern Trust Relationship Manager to facilitate its establishment. Benefit Payments requires all plan directions in writing by an authorized signor from your Relationship Manager.

Closing a Benefit Payment Plan

Closing a Benefit Payment Plan will cease all payment production. To close a plan, the CSR Team will work with the Northern Trust Relationship Manager. Benefit Payments requires all plan directions in writing by an authorized signer from the Northern Trust Relationship Manager.

Redeposits of Personal Checks

If a participant has been overpaid, or has received a benefit payment from the trust in error and has already negotiated the payment, the participant should be asked to repay this overpayment using his/her own personal check. In this case, Benefit Payment Services will need instruction from you concerning the original payment(s) that this personal check is intended to repay. This is to ensure that all financial data such as funding source(s) and deduction amounts are “backed off” accurately. Benefit Payments will ask for this information via the Personal Check Redeposit Instruction Form found on BPP (U.S. Plans Only). Benefit Payments may also need tax instruction from you if the personal check repays a payment issued in a prior year (for U.S.). For Canada, your recordkeeper must send a copy of the letter that was sent to the Estate to Benefit Payments detailing which Plans to credit the funds. Upon receipt of the cheque from the estate, Northern Trust will credit back the funds to the trust account. If for prior years, then Northern Trust will advise the recordkeeper so that tax slips can be corrected.

Returned Payments

Occasionally, a paper check, an ACH/EFT, or a Fed Wire payment is returned to Benefit Payments. This may occur when a participant changes a payment address without notifying you or Benefit Payments. It may occur with an ACH/EFT payment if a bank account number changes, as is common in bank mergers and acquisitions. If Benefit Payments receives a returned electronic payment, the CSR Team will issue a new paper check to participant.

For the U.S. plans, all returned mail will be shredded upon receipt. If paper checks were returned, they would begin to appear on the Outstanding Participant Check Report after 60 days. This report is sent to you and your recordkeeper on a monthly basis.

For the Canada plans, all returned mail (excluding paper cheques) will be bundled and forwarded on to your recordkeeper for further follow-up. The paper cheques will remain at Northern Trust and be stored in a fire-safe secured cabinet until further instruction is received.

Stop Payment/Redeposit

Current Year Stop/Redeposit

If a current year payment is stopped and re-deposited, Benefit Payments will credit the gross amount of the payment to your trust account(s). Benefit Payment Services will pursue recovering all taxes and all miscellaneous withholdings originally made from that payment. In crediting back the gross amount of the payment, Benefit Payments will assume that all taxes and miscellaneous withholdings from that particular payment will be recovered. However, in the event that taxes or other withholdings cannot be recovered, Benefit Payments will debit the trust account(s) for the unrecoverable amounts. A current year payment is defined as a payment issued in the present calendar year. A current year payment is also a payment issued in the previous year, if today's date is before January 20 and the Federal Tax Return for the prior year has not yet been filed with the U.S.; or, for Canada, if today's date is before February 15 and the tax summaries have not been remitted to the Canadian governments.

Non-Current Year Stop/Redeposit

For a non-current year stop/redeposit, Benefit Payments will credit the amount of the payment minus tax withholdings to your trust account(s). Benefit Payments will *not* pursue the recovery of taxes originally made from that payment. For non-current year stop/redeposit, you or your recordkeeper will need to direct Benefit Payments regarding tax reporting.

For Canada, Benefit Payments will recover the taxes from a non-current year stop/redeposit. Unlike the U.S., Canada does not impose any restrictions regarding a time limit to recover taxes. The participant's tax slip will be corrected and a revised tax slip will be issued.

With any stop payment/redeposit, the participant's payment records and history will be revised appropriately.

Stop Payment/Reissue

If requested and if a paper check is still outstanding, (i.e. the paper check has not yet been cashed), Benefit Payments will stop and reissue a benefit payment within 24 hours of your request for the U.S. plans only.

Requests for stop and reissue payments from the Canada plans may not be completed within 24 hours due to the requirements that Benefit Payments must receive confirmation that the stop has been placed and this may not be completed in a 24 hour time frame.

It is Northern Trust's policy to accept a stop payment/reissue request only after five or more business days have elapsed since the check's payable date. This allows a paper check ample time to be delivered to the participant by the United States and the Canada Post Office system. Benefit Payments will not be liable if both checks are cashed.

For security reasons, a reissued check will only be payable to the same payee as the original check. If there is a requirement for a check to be issued to a different payee, you must redeposit the payment first then issue a completely new payment.

When a Stop Payment/Reissue for a benefit payment check is affected, no adjustment to the trust account(s) balance is required. However, with any stop payment/reissue, the participant's payment records and history in Benefit Payments' database will be revised appropriately.

Other Benefit Payments Functions

Check Fraud (U.S.)

If you or your participant suspect fraud, generally in the form of a missing or forged endorsement, Benefit Payments, upon notification, will initiate an investigation, provided the check is less than three years old. Benefit Payments will obtain a copy of the suspect check, and send a copy of it and a claim form ("Affidavit of Forgery") to the participant. The participant must sign and have the form notarized, then return it to Benefit Payments. Upon receipt of the notarized Affidavit of Forgery form, Benefit Payments will initiate a fraud investigation with the bank (known as the "Bank of First Deposit") that initially processed the check.

Forgery claims can take several months to resolve. However, Benefit Payments will follow the claim through to settlement, and if appropriate and when directed by you, reissue payment to the participant. Benefit Payment Services advises that you NOT advance a second payment to the participant until the claim has been fully resolved. If the claim is found to be unwarranted, you will be responsible for pursuing recovery of the second payment.

Check Fraud (Canada)

If you or your participant suspect fraud, generally in the form of a missing or forged endorsement, Benefit Payments will initiate, upon notification, an investigation. Benefit Payments will obtain a copy of the suspect check, and send a copy of it and a claim form ("Statutory Declaration") to the participant. The participant must sign and return the form to Benefit Payments. Upon receipt of the Statutory Declaration form, Benefit Payments will forward to our third-party bank for a full investigation, and a refund of the payment.

Federal TEFRA Notification (U.S.)

The federal government mandates under the Tax Equity and Fiscal Responsibility Act (1982) that participants who receive periodic payments must be notified at least once per year that they may change their federal tax withholding election. To comply with this mandate, Benefit Payments will print a TEFRA notification on each paper check and each ACH Advice. Participants who do not receive either paper checks or ACH Advices will be notified via a special mailing each year. (If a special mailing is required, Benefit Payments will assess a special fee for its service as well as postage expenses.)

The preprinted check stock for U.S. plans includes the TEFRA language on the backside of each check or advice statement. The participants have the option to make changes to their withholding elections each month. The annual TEFRA solicitation is therefore not needed.

The standard Canadian cheque stock will instruct the participants each month how to update their withholding elections by sending a new TD1 form.

Inquiries

The CSR Team handles inquiries from Benefit Payment clients as well as the participants. A formal team back-up structure will be maintained in the event that the assigned CSR Team is unavailable to respond to an inquiry or a client/participant need..

Reconciling

To help avoid errors, Benefit Payments balances its activity to make sure it reconciles accurately on a daily basis (business days only):

- The disbursement checking account is reconciled.
- Tax withholdings are reconciled to IRS/CRA deposits.
- Aggregate benefit payments disbursed are reconciled to the aggregate Trust System transactions.

To assist in your funding and reconciling needs, Northern Trust provides “Cash Forecasting” and “Funding and Disbursement” reports as well as reports listing the value of a client's holdings and debit/credit activity occurring in that period. These reports can be delivered to you and any recordkeeper daily via Northern Trust’s Global Investor Passport (“GIP”).

A “Monthly Activity Report” will be produced by Benefit Payments each month. This report will display all payments disbursed from or re-deposited to the trust account(s).

Standard Benefit Payment Reporting Package

For all payment plans, Benefit Payments produces a standard, comprehensive reporting package which includes all of the reports listed in this section. To facilitate this effort, you must ensure that Benefit Payments has accurate name and address information for the person or persons at your and your recordkeeper’s office who should receive these reports.

Report Review

It is your and your recordkeeper’s responsibility to review all reports distributed by Benefit Payments. You should report any discrepancy or error to your Client Service Team within 15 calendar days, so that Benefit Payments can promptly resolve any issues.

Report Output Methods

Benefit Payment reports will be generally produced in PDF format via electronic report delivery. Benefit Payments may also send reverse files via a transmission line to you or your recordkeeper for reconciliation.

Our comprehensive report package includes:

Daily Reports (produced and delivered daily)

ACH 1-Prenote

This report details ACH Prenote information that has rejected on the system based on reasons received from the participant’s receiving bank.

ACH 3- Change Report (systems may have updated)

This report shows if ACH payment information has changed based on Notice of Change (NOC) received from the participant's receiving bank. This may require client manual updating of participant information.

ACH 6- ACH Redeposits

This report details ACH deposits that have been returned by the participant's receiving bank due to reasons listed on the report. Based on your Benefit Payments Agency Agreement, this may or may not require action on our part.

Deduction Not Taken

This report details any vendor deduction that was not withheld from a participant payment. The client should review the report, and make the necessary corrections to resolve.

Rejected Transactions

The report details rejected transactions that have occurred on the system. The client should review the report, and make the necessary corrections to resolve.

Duplicate Transactions

This report details transactions that were duplicated for a participant with the same reference ID.

End Payment Report

This report details payments that are future dated to be discontinued on the system.

Live Run Reports (produced after every periodic check run)

Live Run Activity Report

This report lists each participant's name, check number, or EFT receiving institution, and payment amount for the current check run. The report reflects each participant's gross and net payment amounts and itemized deductions.

Benefit Reconciliation Report

This report details the daily financial changes for all periodic plans between live run pay cycles. Activity captured includes funding changes, deduction changes, and tax withholding changes. This report is used to balance from one live run's distributions to the next live run's distributions.

Expiration of Employee Contributions Report (U.S. Plans Only)

This report details all participants that have employee contributions expiring within one month following the date of the report. It serves as a preview to upcoming changes made to the participant's payment record.

Monthly Reports (produced on the first business day of the month)

Monthly Activity Report

This report lists each participant's name, check number, or EFT receiving institution, and payment amount for the current check run. The report is cumulative for the month, reflecting each participant's gross and net payment amounts and itemized deductions. The total payment amounts will equal the transactions posted in Northern Trust's accounting reports.

Monthly Activity Recap Report

This report lists monthly activity for a periodic plan but does not display the live run activity in detail. Live run pay cycle activity can be found at the end of the report in the Summary of Totals sections labeled as 'Cycled Payments'. The report reflects participants' gross and net payment amounts and itemized deductions for special dated distributions. The total payment amounts will equal the transactions posted in Northern Trust's accounting reports.

Change Report

This report details the changes for all plans. Activity captured includes set-ups and changes for participants, payments, deductions, and taxes. This report includes the user ids of the individual that entered the transaction and the individual that approved it.

Outstanding Participant Check Report

This report lists checks that have been outstanding for more than 60 days. Your CSR team requires your written direction to stop and re-deposit the check to the trust account or to stop the original payment and reissue another check to the participant. You may also take action on any outstanding payment by utilizing Benefit Payment Passport®.

If payments issued from U.S. non-qualified plans appear on the *Outstanding Participant Check Report* and are not resolved within three or five-years (varies by state dormancy rule), the funds associated with these checks will be escheated to the States.

For all Canada Plans according to the Bank of Canada, cheques not resolved within 10 years, the funds associated with them are turned over to the Bank of Canada.

Outstanding Vendor Check Report

This report is sent monthly and lists checks that have been outstanding for more than 60 days. Your CSR team needs your direction to redeposit the check into the trust account or to reissue another check to the vendor.

Annual Reports (produced annually after tax forms have been created)

Annual Statement of Payments Report

This report will be produced in January at the time of the annual participant tax form mailing. It will list all payment activity per participant for the calendar year. This report is reconciled to the Annual Tax Summary Report. If you or your recordkeeper desire a preliminary version of this same report, contact your CSR Team for assistance.

Annual Tax Summary Report

This report will be produced in January at the time of the annual participant tax form mailing. It will list the tax form information that is sent to various governments and to the participants on annual tax forms. If you or your recordkeeper desire a preliminary version of this same report, contact your CSR Team for assistance.

Payment Processing Schedule and Deadlines

This document will be provided to you and your recordkeeper. The *Benefit Payment Services Payment Processing Schedule* will indicate the exact dates on which Benefit Payment processes will occur for the current calendar year. It will also list Bank Holidays.

Non-Standard Reports

In addition to standard reports, Benefit Payments will assist in meeting additional reporting needs. Non-Standard reports may involve an additional fee. Discuss any reporting needs with your CSR Team.

Tax Procedures and Guidelines

Northern Trust's Federal Employer Identification Number (FEIN)

Benefit Payment Services uses a Federal Employee Identification Number (FEIN) under which it withholds and remits all benefit payment taxes, called a "Universal FEIN." Benefit Payments will not use a unique FEIN Number for you, as procedures surrounding use of a unique FEIN Number ("Segregated FEIN") reduces security and introduces complexity and quality issues.

For Canada, one Business Number each for Federal, Provincial (Quebec) and Non-Resident will be used. However, each RCA plan on record with Northern Trust will have its own unique Federal Employee Identification Number.

Qualified and Non-Qualified Payments (U.S. Plans Only)

Tax processing will be similar for qualified and non-qualified benefit payment plans. The primary difference is that FICA taxes will, at required times, be withheld from non-qualified payments. See below for a separate explanation for FICA withholding.

Federal Taxes

For qualified and non-qualified *periodic* payments, Benefit Payments will calculate federal tax withholding for: i) the U.S. plans based on a specified amount, marital status, number of exemptions; and ii) based on the standard withholding tables and the defaulted claim amounts and any related overrides for the Canada plans. Benefit Payments can also accommodate a combination of the above factors in some cases. For qualified and non-qualified *non-periodic* payments, Benefit Payments will either withhold federal tax based on a flat amount, or based on a calculated percentage of the taxable amount of the payment, as directed and agreed to in writing by an authorized signor. Changes to the federal tax tables are tracked and programmed into Benefit Payment Passport®.

Taxes will also be withheld from payments made to residents of U.S. Possessions, such as Guam, U.S. Virgin Islands and Puerto Rico. For payments to Puerto Rico residents, you or your recordkeeper will direct Northern as to the amount of taxes to be withheld via Benefit Payment Passport®. Due to the complexity of the Puerto Rico Tax Code, which was revised in 2011, you are strongly encouraged to consult with your tax advisor regarding the correct amount of tax withholding for Puerto Rico residents. Northern will not release Puerto Rico tax forms until you or your recordkeeper have verified the content of the tax forms.

State Taxes (U.S.)

When so instructed, Benefit Payments will calculate and withhold state taxes in appropriate states based on a specified flat amount, marital status, number of exemptions, or as a percentage of federal tax withholding, using individual state withholding tables and guidelines, where applicable. Changes to each state's withholding rules and tax tables (where applicable) will be tracked and programmed into the Benefit Payment System. Withholdings will be remitted to each state tax agency in accordance with the individual state's regulations, and all appropriate state tax forms will be filed by Benefit Payments. Benefit Payments will handle all state tax agency inquiries.

Northern Trust will notify you and your recordkeeper of any withholding updates up to two weeks prior to installation of regulation changes.

When you delegate authority to a recordkeeper, Benefit Payments will withhold state taxes as directed by the recordkeeper.

U.S. Citizens living outside the United States and Non-Resident Alien (NRA) Taxes (U.S. Plans Only)

If the participant is a U.S. Citizen living in a foreign country:

Benefit Payments requires a participant-completed IRS Form W-9 for participants who are U.S. citizens residing in a foreign country. The W-9 establishes the participant's status as a U.S. Citizen and it may be provided by you, your recordkeeper or the participant. Once U.S. citizenship is established, tax withholding and reporting will be done just as it would be for any U.S. citizen living within the United States. Benefit Payments provides an annual 1099-R or W-2 tax form for reportable distributions to U.S. citizens living in a foreign country.

Unless Benefit Payments has a W-9 on file, it is assumed that the participant is a NRA participant, and the maximum 30% NRA withholding will apply.

If the participant is not a U.S. Citizen:

Benefit Payments requires an accurate and original participant-completed IRS Form W-8BEN (Certificate of Foreign Status of Beneficial Owner for United States Tax Withholding). This form may be provided by you, your recordkeeper or the participant. This form requires the NRA participant to provide a certification of non-U.S. status and his or her permanent foreign residence address. Northern is entitled to rely on the W-8BEN as proof of a non-resident alien's status. If treaty benefits are claimed this form also requires that the non-resident alien participant provide either his or her social security number, or an Individual Taxpayer Identification Number (ITIN) on the Form W-8BEN. If the individual does not have an ITIN, the participant can obtain one by submitting Form W-7 to the IRS.

Upon receipt of a W-8BEN, Benefit Payments will process the NRA distribution based on information you or your recordkeeper provide, including income source and withholding rate (the treaty rate if a treaty between the participant's country of residence and the U.S. exists and if treaty benefits are claimed). Unless Benefit Payments receives an accurate, original, properly completed and signed W-8BEN, the maximum 30% NRA withholding will apply.

For those participants who receive a lump sum benefit in a non-consecutive year sequence, Northern Trust is required to obtain a new original W-8BEN.

Benefit Payments will provide an annual 1042-S tax form for reportable distributions to NRA participants.

Benefit Payments will follow the above NRA procedures *even when* you delegate authority to a recordkeeper.

Nonresident Payments (Canada Plans Only)

If the participant is not a Canadian resident, then the Non-Resident (NR) treaty rates between Canada and the other countries of the world will be honored. If a participant requests a reduction in the withholding treaty rate from the Canadian government, Benefit Payments will only honor the request upon receipt of the letter from the Canadian government.

Local Taxes (U.S. Plans Only)

Local taxes can be withheld from participant's payments on an as-requested basis. These are remitted to the individual states for payment to, for example, county and school districts, in accordance with the applicable regulations.

Non-Qualified Payments (U.S. Plans Only)

Tax processing for non-qualified Benefit Payment Plans will sometimes be subject to FICA withholding rules.

FICA Taxes (U.S.)

For non-qualified payments, Benefit Payments can withhold FICA, which includes both Social Security (OASDI, or Old Age Survivor Disability Insurance) and Medicare. If you direct Benefit Payments to withhold FICA using the Universal FEIN, Benefit Payments can also deposit this withholding to the IRS, file quarterly 941 forms with the IRS, handle inquiries, and issue W-2 Tax Forms to participants. Benefit Payments will not be able to perform these services in cases where you direct FICA withholding using your company's FEIN.

Because FICA withholding rules for non-qualified distributions are complex and depend upon whether the Company applied FICA taxes prior to distribution, you or your recordkeeper must direct Benefit Payments as to the current amount of taxable FICA wage for all non-qualified plans.

When you delegate authority to a recordkeeper, Benefit Payments will withhold FICA as directed by the recordkeeper.

Participant Tax Forms

For the U.S. only, Benefit Payments will produce annual tax forms for “Universal FEIN” Payment Plan participants to whom Benefit Payments has made disbursements in the prior calendar year.

For Canada and the U.S., certain participants may receive more than one tax form, depending on the distribution type associated with the individual payments the participant has received in the prior calendar year. In addition, participants in more than one payment plan will receive a tax form from each plan.

Imputed Income (U.S. Plans Only)

If you provide appropriate documentation to Benefit Payments, a separate W-2 tax form will be created to report imputed income to the participants. This involves revising participant history and precise analysis and coordination of taxability information. Contact your CSR Team as early in the year as possible if you wish to use this service.

Tax Form Mail Deadline (U.S.)

When using the Universal FEIN, Benefit Payments prints the participants’ applicable payment data on the appropriate tax forms and mails them to the participants annually prior to January 31 of the new calendar year. January 31 is the federally mandated deadline for tax form mailing, unless January 31 falls on a weekend, in which case the mail deadline is the following business day.

Prior to mailing tax forms, Benefit Payments provides you or your recordkeeper with a report of the complete data contained on the tax forms, including the addresses to which they will be sent. See the Reports Section for a description of the *Annual Tax Summary Report*.

Tax Form Mail Deadline (Canada)

February 28th is the mandated deadline for tax form mailing.

Tax Form Reprints

A duplicate copy of each participant’s tax form will be available to view and print from Benefit Payment Passport®.

Tax Form Revisions

Since the window for tax form revision tends to fall between January 31 and March 15 (U.S.) and April 30 (Canada), which are the participant tax-filing deadlines, you acknowledge that it is critical that the CSR Team is informed immediately after determining that a tax form requires revision.

Tax Form Types

Depending on the type of distributions made, Benefit Payments will issue the following tax forms:

For U.S. Plans

1099-R

1099-DIV

1042-S

480.7C (Puerto Rico tax form.)

W-2

For Canadian Plans

T4A

T4-RIF

T4-RCA

RLV 1

RLV 2

NR4