

<u>ADOPTION ASSISTANCE PROGRAM - FAQs</u>

Who is eligible for this benefit?

An "eligible employee" is defined as a full-time regular employee, actively at work, that Graham classifies as an employee on its payroll records, who is regularly scheduled to work a minimum of 30 hours per week, and who has been employed by Graham for at least 12 months. Part-time employees, temporary employees and interns are not eligible to participate in the Program

My spouse also works for Graham. Are we both eligible for this reimbursement?

If both the employee and their spouse or domestic partner work for Graham, the maximum combined reimbursement benefit for the adoption of one eligible child is \$7,500.

My sibling died and I am adopting my niece. Can I be reimbursed for the adoption expenses?

No. An "eligible child" is a child under age 18 or an individual 18 or older who is physically or mentally unable to care for themselves. An eligible child does not include a blood relative or child/blood relative of the employee's spouse or domestic partner (e.g. stepchild of spouse or domestic partner)

I started the adoption process before my date of hire at Graham, but the adoption was finalized after I started working here. Can I be reimbursed for any of these expenses?

No. An employee must be actively employed by Graham at the time the eligible expense is incurred. Expenses incurred after the date of hire by Graham will be considered for reimbursement, provided the employee is still employed at the time of finalization and when reimbursement is paid.

My spouse and I are adopting twins. What amount am I eligible to request for reimbursement?

An eligible employee can be reimbursed up to \$7,500 per adoption for qualified expenses. If an employee adopts a second child, they will be reimbursed up to an additional \$7,500. The Program provides reimbursement for a maximum of two (2) adoptions throughout the duration of the employee's tenure with Graham.

My child's adoption was just finalized. Can I be reimbursed for expenses I paid out of pocket in 2024?

No. Only expenses incurred on or after 1/1/2025, which is the effective date of the adoption assistance policy, are eligible for reimbursement.

What adoption expenses are eligible for reimbursement?

Only expenses that are reasonable, necessary, and directly related to, and the principal purpose of which is for, the legal adoption of an eligible child are eligible for reimbursement under the Program. Examples of eligible expenses include the following:

- Adoption agency placement fees and any other non-recurring fees associated with meeting the requirements of the adoption such as:
 - o Home study fees
 - Application fees
 - Social worker/facilitator fees
- Attorney costs for the adoption
- Court costs for the adoption
- Reasonable and necessary transportation, meals and lodging incurred solely for the purpose of completing the adoption



- Other reasonable non-recurring expenses directly related to the adoption of an eligible child, including immigration fees (for international adoptions)
- Translation services
- Medical expenses for the child required to complete the adoption (including immunizations)

Are there any expenses that are NOT eligible for reimbursement?

Expenses that are not eligible for reimbursement through the Program include, but are not limited to:

- Adoption of individuals eighteen (18) year or older
- Any adoption that is not legally valid and recognized in the U.S.
- Any expenses that violate a state, federal, or local law
- Guardianship or custody costs that are not associated with the legal adoption of the child
- Expenses incurred prior to your employment with Graham or the effective date of the Program
- Expenses reimbursed under another employer program, or a state, local or federal program
- Expenses claimed as a credit or deduction on your personal tax return

The adoption I was pursuing fell through and wasn't finalized. Can I still request reimbursement for the expenses I incurred?

No. Only qualified expenses related to an adoption that is finalized are eligible for reimbursement.

How do I request reimbursement?

Eligible employees seeking reimbursement must complete an Adoption Assistance Reimbursement form and submit it with the legal adoption decree and itemized receipts for qualified adoption expenses via one of the following methods:

E-MAIL: gpcbenefits@grahampackaging.com

• FAX: 717-326-1033

MAIL: Graham Benefits, 700 Indian Springs Drive, Suite 100, Lancaster, PA 17601

Applications for reimbursement must be made within 6 months of the adoption finalization date. Adoption Assistance Reimbursement Forms can be found on Graham's Benefits website, www.gpcbenefits.com under the Adoption Assistance Program page.

NOTE: All receipts and documents must be translated into English and monetary amounts listed in US dollars. Documentation not meeting these requirements will not be accepted.

I already adopted one child but only requested \$5,000 for reimbursement. If I adopt another child, does that mean I can request \$10,000 for reimbursement since I didn't use the full \$7,500 the first time?

No. Unused funds for one adoption cannot be used for reimbursement for a second adoption.

When can I submit my request for reimbursement?

Employees can request reimbursement for qualified expenses after the adoption is legally finalized, and the child has been placed in the employee's home.



Is this adoption reimbursement taxable?

Adoption assistance benefits provided under the Program are generally not subject to federal income tax withholding. However, the payments are not excluded from Medicare, Social Security and Federal Unemployment taxes. Any payments received under this program will be reported on the employee's W-2. State and local tax laws may vary and the benefits received under the Program may be subject to state and/or local taxes.

How and when will the reimbursement be paid to me?

Employees will be notified in writing of the status of their request for reimbursement within 10 days after the reimbursement request review is completed. Payment will be made as soon as administratively feasible via payroll within 30 days of the date when the reimbursement decision is communicated to the employee.

Can I add my adopted child to my medical plan?

Yes. At the time of placement, eligible employees may add their child to certain benefit elections since placement for adoption is considered a qualified life event. In addition, qualified employees may enroll in select benefit plans. Any additions to your benefit plans must occur within 31 days of placement date.