



ADOPTION ASSISTANCE PROGRAM

OVERVIEW

The City National Bank Adoption Assistance Program (“Program”) provides reimbursement to eligible colleagues for certain expenses related to the adoption of a child.

- For adoptions occurring *on or after* January 1, 2020*, the maximum reimbursement is up to \$10,000 per adoption. In the event of multiple adoptions, the maximum reimbursement per calendar year is up to \$20,000.

ELIGIBILITY

All full-time colleagues scheduled to work 30 hours/week are eligible to apply for adoption assistance after one year of continuous service with City National. Part-time colleagues (i.e., scheduled to work at least 20 hours/week but less than 30) are eligible after five years of service. If both adoptive parents are employed by City National, only one can utilize the benefit per adoption. The above herein referred to as “Eligible Colleagues.”

The adopted child must be under 18 years old, and the effective date of the adoption must be on or after the Program effective date..⁽¹⁾ To receive reimbursement, the colleague must be employed at City National on both the date of the adoption is Legally Finalized and the date of reimbursement. This benefit applies only to domestic U.S. adoptions.

What is “Legally Finalized”?

An adoption is Legally Finalized when the adoptive parent(s) have been granted permanent legal custody of the child in the U.S according to the current U.S. law governing adoptions; and the adopting parent(s) can provide a notarized adoption decree or notarized court order.

HOW TO GET STARTED

Before you begin the adoption process, contact WINFertility, City National’s administrative partner, for information about all aspects of the Program, including details about eligibility and covered expenses. You can reach a WINFertility Service Team Member at 855-747-8786, Monday - Friday 9:00 a.m. - 7:30 p.m. EST. More details are also available at <https://managed.winfertility.com/cnb>

BENEFIT SUMMARY

The Program provides reimbursement of up to \$10,000 per adoption, for adoptions Legally Finalized on or after January 1, 2020. In the event of multiple adoptions, the maximum reimbursement per calendar year is up to \$20,000.

ELIGIBLE EXPENSES

Once the adoption is Legally Finalized, Eligible Colleagues may be reimbursed for expenses up to the maximum benefit available under the Program (see Benefits Summary) resulting from specified legal adoption occurrences as defined below, that are not reimbursed from any other source. As noted above, if you and your spouse or domestic partner are both Eligible Colleagues, your combined maximum reimbursable expenses are \$10,000 per adoption, and up to \$20,000 per calendar year if multiple adoptions.

Eligible Colleagues may utilize both the Surrogacy and Adoption Benefit, but they cannot utilize both benefits for the same child.

EXAMPLES OF ELIGIBLE EXPENSES PER ADOPTION

- Agency and placement fees
- Legal fees and court costs directly associated with the adoption
- Home suitability studies
- Medical expenses of a birth mother
- Temporary foster care costs incurred during the adoption process
- Transportation and lodging expenses (including meals while lodging)
- Immunization fees associated with an adoption occurrence

EXAMPLES OF NON-ELIGIBLE EXPENSES PER ADOPTION

- Any voluntary or required donations or contributions to the adoption agency
- Compensation to the birth mother
- Cost of living expenses and/personal items such as rent, utilities, food, clothing, over-the-counter supplements, toys, furniture, etc.
- Loss of income, including but not limited to, loss of income due to complications of pregnancy such as bed rest for birth mother
- Expenses associated with the adoption of a spouse's child, stepchildren or other family relative
- Costs related to surrogacy agreements
- Costs to obtain guardianship or custody of the child that are not associated with the child's legal adoption
- Expenses that are not appropriately documented, or that are associated with adoptions which are not legally recognized
- Expenses otherwise reimbursed or covered by other City National plans or programs
- Expenses reimbursed under the plans or programs of the non-City National parent's employer, or paid or reimbursed by any other source
- Expenses not directly related to this adoption
- Any other expenses deemed by the IRS as not reimbursable

Adoption expenses eligible for reimbursement under this Program are defined in accordance with Internal Revenue Code Section 23.

City National Bank retains the right to deny benefits under the Program for any expense that it deems to have been incurred in an illegal arrangement or that may result in any legal or tax liability to City National Bank.

PLAN ADMINISTRATION AND REIMBURSEMENT APPLICATION PROCESS

City National Bank has retained WINFertility, Inc. (WIN) to administer the Program, including adjudicating eligible expenses. WIN will review and validate reimbursable adoption expenses submitted by Eligible Colleagues who want to take advantage of this benefit.

- Enroll with WINFertility: Eligible Colleagues MUST enroll with WINFertility by completing the Initial Notification & Benefit Verification Form provided by WINFertility. WINFertility will verify the applicant's eligibility with City National Bank's Benefits Department. (See How To Get Started above.)
- Apply for Reimbursement: Eligible Colleagues may apply for reimbursement for Eligible Expenses once the adoption has been Legally Finalized, but no later than 180 days from the date the adoption is Legally Finalized.
- Complete and submit your Adoption Reimbursement Application, available from WINFertility, along with the Required Documentation and Itemized Receipts to:

WINFertility, Inc.
 Greenwich American Center
 One American Lane, Terrace Level
 Greenwich, CT 06831
 Attn: WINFertility Specialty Services
 [or email to: WINSpecialtyServices@WIN-Healthcare.com]

- Required Documentation for Adoption: Notarized copy of the adoption decree or a notarized court order. Proof the adopted child legally resides with the Eligible Colleague in the U.S., such as U.S. Passport, U.S., or U.S. Birth Certificate.
- Itemized Receipts

Include copies of original itemized bills on company letterhead, along with itemized receipts and proof of payment, such as cancelled checks or bank statements, showing payment has been made for all eligible expenses being submitted for reimbursement. You may submit claims in excess of the allowable benefit; but the benefit will be reimbursed only up to a maximum benefit of \$10,000 per adoption. Please submit all documentation together, as claims will be reviewed in their entirety.

If submitted documentation requires additional substantiation and receipts, you will be contacted by WINFertility. Once your application form and required documentation have been reviewed and approved, your reimbursement will be paid through City National Bank's payroll as soon as administratively feasible, typically within two to three payroll cycles.

LEGALITY OF AGREEMENT

The legality of an adoption agreement may vary from state to state. It is YOUR responsibility to make sure the adoption relationship you are entering into conforms with all laws and regulations before submitting eligible expenses for reimbursement under the Program. [City National Bank](#) will only provide this benefit to support adoption arrangements that comply with all applicable laws and will deny payment for any international adoption arrangement.

PAYING TAXES ON THE REIMBURSEMENT

Pursuant to IRS requirements, reimbursements made under this program will be subject to applicable Social Security and, Medicare tax withholding. Colleagues also may be subject to other taxes and/or credit limitations under differing tax laws of the state in which they reside, including income tax. Colleagues should consult with their tax advisor on questions related to their individual tax impact related to reimbursements provided under this program for adoption-related expenses.

LIFE EVENT FOR CITY NATIONAL GROUP BENEFITS

Once your adoption is finalized and the child becomes your legal dependent, the City National Bank Welfare Plan allows you to enroll your child in health coverage, if you do so within the allowed time period. You need to enroll your child through the Me@CNB > Myself > Life Event) within 31 days to ensure your child's coverage takes effect on the date legal adoption is finalization. Otherwise, you'll need to wait until the next Annual Benefits Enrollment period to enroll your child for coverage effective the following year.

IF YOU ARE ON A LEAVE OF ABSENCE

You can apply for benefits under the Adoption Reimbursement Program while you are on an approved leave of absence, if you continue to remain an Eligible Colleague as defined above.

IF YOU LEAVE CITY NATIONAL BANK EMPLOYMENT OR CHANGE TO AN INELIGIBLE STATUS

You must be employed with City National Bank and meet the eligibility requirements noted above to be eligible for reimbursement. If you leave employment from City National Bank or change to an ineligible status before completion of all program requirements, you will not be reimbursed.

GENERAL PROVISIONS AND DISCLOSURES

City National Bank retains the sole discretionary authority to interpret the Program, to make eligibility and benefit determinations, and to make factual determinations in connection with the Program. Any determinations of City National Bank (or, as applicable, WINFertility) are final and binding.

- Program benefits are payable solely from the general assets of City National Bank. -
- City National Bank does not consider this Program to be an ERISA plan.
- Benefits under this Program are not eligible for continuation under COBRA.
- In no event will City National Bank reimburse expenses that were incurred outside of the United States or that are incurred within the U.S. for a surrogate who is not a U.S. resident.
- Reimbursements under this program are payable only to Eligible Colleagues. The right to reimbursement cannot be transferred or assigned in whole or in part, either directly or by operation of law or otherwise.
- The Program will be administered in compliance with the applicable requirements of Internal Revenue Code.
- City National Bank has the right to modify, amend or terminate this Program at any time, with or without notice.

PROGRAM EFFECTIVE DATE: October 1, 2013, revised as of January 1, 2020 and restated January 1, 2022.

⁽¹⁾ For adoptions occurring *before* January 1, 2020, the maximum reimbursement is \$5,000 per adoption.