

The Baldwin Group

True North Colleague Fund

Date: 7.3.2024

Table of Contents

General Policy Statement	2
Mission Statement	3
General Fund Guidelines and Applicant Eligibility	4
Qualifying Events	5
Covered Expenses.....	6
Application Review Process	8

General Policy Statement:

America's Charities is dedicated to treating all applicants in a fair and consistent manner without regard to any basis prohibited by law, including:

- Age,
- Race,
- Ethnicity,
- Color,
- Sex,
- National origin,
- Disability,
- Religion,
- Marital status,
- Sexual orientation,
- Military or veteran status,
- Genetic predisposition, gender identity or expression,
- Pregnancy or perceived pregnancy status, or
- Status in any other group protected by applicable Federal, State, or local law.

The Baldwin Group True North Colleague Fund Mission Statement:

True North Colleague Fund (“Fund”) is a program to assist eligible individuals coping with unexpected financial hardships that place undue stress on the applicant and their family. The Fund provides approved applicants with funds to help them recover more quickly from unexpected financial hardship resulting from the impact of federally qualified, natural and other disasters, along with other personal hardships.

America’s Charities, a nonprofit 501c3 organization based in Virginia, administers and oversees the Fund. America’s Charities is responsible for the management of the Fund, including establishing the overall policy, performing all reviews and decisions for all applications. The Baldwin Group is not involved in the review of any application or appeal and America’s Charities maintains all authority over the fund to make decisions on all applications in its sole discretion according to the guidelines established in this policy.

The purpose of this policy is to detail the general and eligibility guidelines as well as the process for applying for a grant from the Fund. Without notice, America’s Charities reserve the right to revise this Policy and any related procedure, process flow, or other related document, including, but not limited to employee eligibility, application requirements, and Fund purpose.

General Fund Guidelines and Applicant Eligibility:

General Fund Guidelines

America's Charities have established the True North Colleague Fund with the following general guidelines:

- The Fund will grant approved eligible applicants assistance with grants who have Covered Expenses (defined below) resulting from a Qualifying Event (defined below).
- Assistance from the Fund, including all grant applications, is subject to the availability of funds, extent of applicant's need, and satisfactory completion of the application as determined in America's Charities sole discretion in accordance with these and other guidelines. If the Fund does not have a balance to support grants of assistance, the Fund application site may be closed for applications until further funding is provided.
- To be considered complete, an application must contain all Required Documentation (defined below).
- Awards of assistance shall be made based on financial need and the severity and impact of the disaster or other emergency on the applicant and their family.
- Applicants may appeal a denial of assistance for an application within ten (10) business days of being notified of the committee's decision; appeals must contain new information and documentation not previously submitted in order for an appeal to be considered. Applicants are only allowed one (1) appeal per denied application.
- Eligible applicants must demonstrate a financial hardship in their application due to a Qualified Disaster or Personal Hardship.
- The one-time maximum grant size to an employee applicant for a Qualified Disaster (natural or otherwise) is \$5,000.
- The one-time maximum grant size to an employee applicant for a Personal Hardship (defined below) is \$5,000.
- Approved applicants are eligible for no more than one award per Qualified Event category in a calendar year (i.e., one for a Qualified Disaster, one for Personal Hardship). Only one grant per Qualified Event category in a calendar year is allowed for The Baldwin Group colleagues or former Colleagues residing in the same household. The Baldwin Group Qualifying former Colleagues and 1099s, if eligible per the above, may apply for up to one award in the immediate twelve month period following their termination date.
- The life-time maximum grant amount in total to employee applicants over their tenure with The Baldwin Group for both Personal Hardship and Qualified Disasters is \$25,000.

Applicant Eligibility

America's Charities have established the criteria below to determine the charitable class of the fund and an applicant's eligibility for assistance from the Fund:

- All Baldwin Group colleagues in active status or on approved leave are eligible to apply for assistance the first of the month following their date of hire.
- Current Independent Contractors (1099s) may also be eligible:
 - Active Medicare 1099s are eligible to apply once they have two hundred (200) or more active policies in force through BRP.
 - Active Non-Medicare 1099s are eligible to apply the first of the month following their sixth (6th) monthly payment from BRP.

- Former Colleagues and previously eligible 1099s, who were not terminated for cause and are otherwise in full compliance with their post-termination obligations are eligible to apply within twelve months of their termination date
- All current colleagues must have been employed with The Baldwin Group on the date of the Qualifying Event and must maintain employment with The Baldwin Group throughout the application review and award process in order to be eligible for assistance. Members of the same household that are employed by The Baldwin Group
- Qualifying Events must have occurred no more than twelve months prior to the application date.
- Applicants cannot be approved for the same Personal Hardship or Qualified Disaster more than once.
- Approved applicants are eligible for no more than one award per Qualified Event category in a calendar year (i.e., one for a Qualified Disaster, one for Personal Hardship). Only one grant per Qualified Event category in a calendar year is allowed for The Baldwin Group colleagues or former Colleagues residing in the same household. The Baldwin Group Qualifying former Colleagues and 1099s, if eligible per the above, may apply for up to one award in the immediate twelve month period following their termination date.
- Applications will be considered in light of past applications and disbursements. Priority for grants is given to applicants who have not received grants previously.

Qualifying Events:

Qualifying Events are unexpected or unavoidable circumstances outside an individual's control that create a financial hardship for an individual and their family. These are usually one-time events that cause an individual to spend their rent, mortgage, or utility money on unexpected bills. A Qualifying Event is a Qualified Disaster or a Personal Hardship. Qualifying Events must have occurred no more than twelve months prior to the application date.

Qualified Disaster

A Qualified Disaster (as defined by the IRS in Publication 3833) is any event that is:

- A disaster which results from a terrorist or military action.
- A Presidentially declared disaster such as a natural disaster.
- A disaster which results from an accident involving a common carrier.
- Any event which is determined to be catastrophic by the Secretary of the Treasury or his or her delegate.

Examples of Qualified Disaster Hardship Events:

- Evacuation from Qualified Disaster – evacuation costs of transportation, shelter, food and clothing due to residing in FEMA declared disaster zone for the applicant and immediate family members;
- Loss of Employment or Reduction of Income due to Qualified Disaster - furlough, reduction in hours/income or termination due to a Qualified Disaster for applicant;

- Medical Diagnosis of or Injury from Qualified Disaster – medical or hospitalization expenses related to the diagnosis of or injury from a Qualified Disaster for applicant or immediate family members;
- Necessary and Essential Qualified Disaster Related Expenses – increase in vital expenses incurred from a Qualified Disaster for applicant or immediate family members; and
- Property Damage or Loss due to Qualified Disaster - damage to applicant's personal primary residence or loss of employee's personal property in a FEMA declared disaster zone.

Personal Hardship

Other Qualifying Natural or Human-made Disasters:

An Other Qualifying Disaster is an event for which the need for assistance must stem directly from:

- a natural or localized disaster which may not reach the level of a declared Qualified Disaster, such as a devastating flood, ice storm, hurricane, tornado, earthquake, or fire;
- short-term personal emergency like a house/apartment fire or flood resulting in a loss of basic needs such as food, clothing, or shelter.

Other Qualifying Disasters include loss or damage to the primary residence from a natural or localized disaster that results in the applicant's primary residence being destroyed, rendered unlivable, or otherwise in need of costly repairs in excess of insurance.

Financial Hardship (non-exhaustive):

Financial Hardships are unexpected and unavoidable events that result in financial stress on applicants and their immediate family and are not covered by insurance or due to any negligence, recklessness or intent of the applicant or their immediate family. In order to be eligible, the expenses resulting from the Financial Hardship must be the responsibility of the applicant. Below is a list of events and expenses that the Fund classifies as Financial Hardships.

- Medical/dental/hearing/vision expenses for applicants and/or immediate family member due to illness or injury that is not covered by insurance, other non-routine medical expenses, or reasonable expenses related to travel to receive emergency or necessary medical services;
- Illness or hospitalization of applicant and/or immediate family member resulting in loss of work or to care for and provide resources for a critically ill immediate family member resulting in loss of work;
- Death/Funeral expenses for an applicant or their spouse/domestic partner and the applicant's or spouse/domestic partner's child, parent or sibling. Travel expenses of an applicant or immediate family member related to attending a funeral of those listed above as well as an applicant's sister-in-law or brother-in-law, grandparent or step-grandparent, grandchild or step-grandchild, or legal guardian;
- Catastrophic or extreme financial hardship for unexpected, unavoidable reasons beyond an individual's control such as the termination or layoff of an applicant's spouse or domestic partner's primary source of income (cannot be due to misconduct or disciplinary actions), accident (cannot be an at fault accident), or non-

routine vehicle repair (cannot be deemed typical maintenance of vehicle such as brakes, tires, oil change, etc.) or non-routine home repair that restricts ability of applicant to care for self and household (cannot be routine maintenance of home such as replacement of roof due to normal wear and tear);

An “immediate family member” is defined as an applicant’s spouse/domestic partner, child, sibling, parent, grandparent and grandchild. This includes stepparents, stepchildren, stepsiblings, adoptive, in-law, and foster relationships. The immediate family member must reside in the applicant’s household in order to be eligible and are a dependent of the applicant or their spouse/domestic partner.

Other Considerations

In order to ensure the long-term viability of the Fund, all requests may be evaluated based on the following considerations:

- Measures the applicant took to protect themselves against/or to minimize loss;
- Resources evaluated prior to requesting assistance; or
- Alternatives to request that may be available to assist with immediate needs.

Covered Expenses

If an applicant has suffered a Qualifying Event, then they may submit for a grant from the Fund to assist with Covered Expenses. A non-exhaustive list of bills, costs, payments, and other expenses that are considered Covered Expenses is identified below. The Fund will not grant assistance for The Fund does not replace lost income. A non-exhaustive list of Ineligible Expenses is identified below. To be considered a Covered Expense, applicants must submit Required Documentation. In order to be eligible, the expenses resulting from the Financial Hardship must be the responsibility of the applicant.

America’s Charities has determined in its sole discretion these expenses to be Covered and Ineligible Expenses.

Examples of Covered Expenses (non-exhaustive) related to Qualifying Event:

- Rent or mortgage payments;
- Reasonable and necessary personal, family, living or funeral expenses;
- Reasonable and necessary travel expenses incurred to assist in the care of self or an immediate family member facing a medical emergency that are participating in the BRP Health Plan arising as a result of obtaining medical services that are covered under the terms of the BRP Health Plan, but are completely unavailable within 150 miles of the colleague’s residence or work place. Services will not be considered unavailable if they are legally available and accessible through any provider within the applicable area or through telemedicine options. Travel expenses will be limited to flights, mileage or car rental, meals and lodging. Any time off needed with respect to this travel will be subject to the regular paid time off, sick time and other leave policies that may be applicable, such as Family Medical Leave. Travel of an adult with a minor dependent who is in need of the medical services will also be eligible for reimbursement subject to the annual and lifetime limits. Colleagues located in Texas or other jurisdictions may not be eligible for grant

assistance in circumstances where the provision of such funding would render America's Charities or the Fund subject to legal or criminal liability.

- Reasonable and necessary non-maintenance expenses incurred for the repair or rehabilitation of a personal primary residence;
- Reasonable and necessary expenses incurred for the repair or replacement of the contents of a personal primary residence;
- Reasonable and necessary non-routine/emergency veterinarian bills;
- Emergency childcare expenses;
- Essential furniture, appliances, electronics damaged beyond repair;
- Essential Utility bills (water, heat, electricity, etc.);
- Non-Routine medical bills/expenses not covered by insurance (including deductibles and co-pays) for vision, dental, mental health, medical health, and hearing expenses;
- Funeral or burial expenses, including travel expenses (mileage, rental car, airfare, food and hotel);
- Basic living expenses (food, clothing);
- Credit card charges, auto and other debt that resulted directly from a Qualifying Event;
- Disconnection or eviction notices resulting from Qualifying Event;
- Adaptive modification to personal primary residence (e.g., wheelchair ramp);
- Limited hotel accommodations or shelter, and
- Similar expenses as determined by America's Charities in its sole discretion.

Examples of Ineligible Expenses (non-exhaustive):

- Any expense, bill, payment invoiced to applicant or with a service or due date more than 180 days prior to the date applicant's application is submitted;
- Replacement of lost income such as loss of household income due to a reduction in hours, a demotion, or loss of overtime, the loss of a spouse or domestic partner's job due to cause or termination, the loss of a secondary job of applicant, a divorce or separation, maternity leave, or the loss of child support.
- Credit card bills, auto and other debt not related to Qualifying Event;
- Accumulated financial distress, not incurred as a result of Qualifying Event, that results in not enough income to cover regular monthly bills;
- Wage garnishments;
- Disconnection or eviction notices not related to a Qualifying Event;
- Tuition and other school related expenses or fees;
- Any expense where the provision of such funding would subject America's Charities or the Fund to legal or criminal liability;
- Down payment or purchase of a car or a home;
- Medical Expenses for an uncomplicated pregnancy*;
- Adoption Fees;
- Expenses related to routine maintenance of cars such as brakes, oil changes, tire replacements, car registration fees, inspection fees, etc.;
- Non-essential electronics such as gaming systems, stereo equipment, and smart home devices;
- Accidental damages due to negligence of applicant;
- Elective services (such as cosmetic or fertility procedures*);
- Non-essential utilities, such as cable television
- Legal fees, court costs, fines, traffic tickets or payment for legal representation;
- Federal, State, Local Income or Property Taxes;

- Expenses resulting from divorce or separation;
- Expenses that are or would be covered under medical/homeowners' insurance (while the Fund may provide assistance for expenses that aren't eligible for reimbursement under medical or homeowners insurance, please note this fund does not serve as a replacement for insurance);
- Standard living expenses which do not cause financial stress;
- Expenses due to general inflation or increased costs;
- When other aid or assets are readily available;
- Expenses due to applicant's lack of adequate financial management;
- Other expenses considered to be solely replacement of lost income; and
- Similar expenses as determined by America's Charities' sole discretion.

***Additional Information Regarding Medical Expenses and Qualified Events**

Medical expenses are eligible covered expenses ONLY if they were incurred as a result of a qualifying event. Qualifying events are one-time, unanticipated, unavoidable occurrences that are outside of the applicant's control. Routine, non-emergency, and/or elective surgeries and procedures (including preventative care and uncomplicated pregnancies*) are not considered qualifying events, and any expenses related to those events are not covered under this policy.

Required Documentation:

Applicants will be required to provide documentation as part of their application for assistance to substantiate their Qualifying Event as well as show financial hardship due to expenses related to their event. Required Documentation is dependent on the individual circumstances of each application and is subject to change.

Required Documentation (non-exhaustive): - All documentation must be in the name of the applicant or the applicant's spouse/domestic partner.

- Mortgage or Rent Statement (or current/future lease) - must have applicant's name on documentation
- Personal financial statements (verification of family income and expenses and other available assets)
- Substantiation documentation of the Qualifying Event, examples include:
 - Photos of damage
 - Insurance claims, explanation(s) of benefits and deductibles
 - Police/Incident report or fire report
 - Certification of medical condition
 - Certificate of death and obituary
 - Approved FMLA Documentation
 - Other hardship event documentation at America's Charities sole discretion
- Expense documentation showing financial hardship related to Qualifying Event where the responsibility of payment is that of the applicant or the applicant's spouse/domestic partner, examples include:
 - Repair estimates with readily verifiable contact information
 - Receipts of incurred paid expenses
 - Billing statements

- Paystubs showing unpaid time off
- Medical bills showing medical services performed, date of medical service and patient responsibility
- Funeral Invoice or estimate showing applicant as responsible for payment
- Other expense documentation at America's Charities sole discretion

Application Review Process

A link to the online application will be provided to The Baldwin Group to be placed on its website/intranet and individuals can follow the link to begin the application process. Applicants will be provided directions for submitting the application and all required supplemental documentation to America's Charities for review.

Applicants will be contacted by America's Charities should any additional information be required in order to complete the application process. Applicants will be given three (3) business days to supply any missing information upon request from America's Charities. Failure to supply required information in a timely manner will result in a delay in the review process and/or application denial.

Within seven (7) to ten (10) business days after America's Charities has deemed an application complete, applicants will receive a final determination of acceptance or denial from America's Charities. America's Charities will make all reasonable efforts to review completed applications in a timeline to benefit applicants impacted by Qualifying Events, especially those applicants impacted by a Qualified Disaster.

Approved grants will be provided directly to the eligible applicant via EFT or e-check. For more information on how grant awards will be processed, please see the Fund's FAQs and application site.

Definitions:

Domestic Partner: is a person in a domestic partnership with an eligible applicant. The term "domestic partnership" is defined as a committed relationship between two adults, of the opposite sex or same sex, in which the partners:

- are each other's sole domestic partner and intend to remain so indefinitely;
- maintain a common residence, and intend to continue to do so (or would maintain a common residence but for an assignment abroad or other employment-related, financial, or similar obstacle);
- are at least 18 years of age and mentally competent to consent to a contract;
- share responsibility for a significant measure of each other's financial obligations;
- are not married or joined in a civil union to anyone else;
- are not a domestic partner of anyone else;
- are not related in a way that would prohibit legal marriage in the U.S. jurisdiction in which the partnership was formed.

Immediate Family Member: is defined as an applicant's spouse/domestic partner, child, sibling, parent, grandparent and grandchild. This includes stepparents, stepchildren, stepsiblings, adoptive, in-law, and foster relationships. The immediate family member must reside in the applicant's household in order to be eligible and be a dependent of the applicant or their spouse/domestic partner.

Uncomplicated Pregnancy: is defined by the American College of Obstetrics and Gynecology (ACOG) as the absence of both pre-existing medical co-morbidities (e.g., type 2 diabetes, essential hypertension), pre-existing/early obstetric (e.g., multiple pregnancy) or new-onset obstetric (e.g., gestational diabetes, pre-eclampsia) complications. Outcomes of uncomplicated pregnancies result in a liveborn baby not small for gestational age, regardless of the use of routine, elective, and/or medically necessary interventions.