

# STARR

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## INSURANCE COMPANIES

### **Policy and Procedure**

*This Policy and Procedure does not alter the Company's at-will employment policy and may be changed or replaced at any time with or without notice.*

### **Subject: Adoption Assistance Program**

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#### **Purpose:**

Starr understands adoption is a rewarding and sometimes costly experience that allows families to grow in many ways. To support employees who are adoptive parents, Starr provides adoption benefits of up to \$10,000 per adopted child to eligible employees for qualifying adoption-related expenses.

This policy does not alter Starr's at-will employment policy and all employees applying for or receiving benefits under this program remain employees at will. Starr retains the right to alter or terminate this program at any time, with or without notice.

#### **Eligibility:**

- Regular benefits-eligible employees of Starr, after completion of one month of full-time employment.
- In the event an employee and his/her spouse/domestic partner are both employees of Starr, only one employee will be eligible to participate in this program.
- Adoptions made through public, private, domestic, international, and independent means are eligible.
- The adopted child must be under the age of 18, not related to the employee by blood, marriage, or domestic partnership.
- The employee must be an active employee when the reimbursement occurs.

#### **Reimbursement:**

Upon placement in the home, eligible adoption-related expenses will be reimbursed to a maximum of \$10,000 per child. Reasonable and necessary expenses directly related to the adoption are reimbursable, including the following:

- Agency and placement fees
- Attorney fees, other legal fees and court costs
- Medical expenses related to the child's birth
- Medical maternity expenses for the child's biological mother not covered by insurance
- Required medical expenses for child prior to adoption

- Temporary foster care expenses incurred prior to placement
- Immigration fees
- Immunization costs
- Translation services
- Transportation and lodging expenses related to the adoption

Not all expenses are eligible; examples are:

- Medical exams for the adopting parents
- Costs of personal items, i.e. clothing, food
- Expenses incurred while not an employee

Please refer to Section 137 of the Internal Revenue Code pertaining to adoption assistance programs for eligible and ineligible expenses.

**Pre-Approval:**

You may contact Human Resources in advance to determine if you are eligible for the program.

**Procedure for Reimbursement:**

Upon placement of the child in your home, submit an Adoption Assistance Request Form, along with itemized receipts for eligible incurred expenses to Human Resources. An Adoption Placement Agreement must also be provided. Human Resources will review the request and upon approval will submit to Payroll for payment. The reimbursement amount will be presented to Human Resources and communicated to the employee.

**Policy Violations:**

- Employees will be responsible for the repayment of this benefit to Starr if they voluntarily end their employment with Starr prior to twelve-months following the reimbursement of eligible expenses under this program.

**Taxation:**

- Qualified adoption assistance will be reported on the employee's Form W-2, and the amounts withheld for social security and Medicare taxes will also be reported.
- It is the employee's responsibility to verify with the IRS or his/her tax consultant the tax implications of receiving adoption assistance reimbursement.
- Employees assume all tax liability for the reimbursement which is dependent upon annual adjusted gross income limitations. Please refer to Section 137 of the Internal Revenue Code for further information.

Contact Benefits at [Benefits@starrcompanies.com](mailto:Benefits@starrcompanies.com) for a request form.

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