

Volunteer Match Program Policy

Purpose and Scope

This Volunteer Match Program Policy ("Program") applies to the employees of Great-West Life & Annuity Insurance Company and its subsidiaries ("Great-West Financial").

This Program provides Great-West Financial employees the opportunity to increase the impact of their volunteer efforts with charitable organizations. Great-West Financial will match each hour of volunteer time with a \$10 donation up to \$5,000 annually (including donations made through the Financial Match Program) based on the criteria listed below.

Eligible Employees/Participants

The following individuals are eligible to participate in the Program.

- Regular full and part time Great-West Financial employees.

Eligible Organizations and Programs

Charitable organizations must meet the following minimum criteria in order to receive a matching donation from Great-West Financial under the Program. Associates should conduct adequate due diligence before deciding to fund or support causes to ensure your nonprofit is eligible under our Action Matches guidelines. The organization must be:

1. Based in the United States;
2. Charitable, tax-exempt and registered under 501(c)(3) of the Internal Revenue Code or a public school or district

Religious organizations with secular programming are also eligible if, in addition to the criteria listed above, they meet the following requirements.

- Hours spent volunteering with religious organizations are eligible if the volunteer project supports an ongoing secular community service program that does not propagate a belief in a specific faith. The secular service program cannot be limited exclusively to the organization's members. These programs must have a formal mission and a separate program budget. Examples include homeless projects, food banks, shelters, and literacy programs.

Ineligible Organizations and Programs

The following organizations are not eligible for a matching donation from Great-West Financial under the Program.

- Exclusively religious, political, fraternal or professional organizations or associations.
- Any organization which discriminates on the basis of race, religion, gender, age, national origin, ethnicity, disability, political affiliation or sexual orientation.
- Other organizations, programs, or entities which, at Great-West Financial's discretion, pose a risk to the company.

Eligible Volunteer Hours

All volunteer activities must meet the following criteria to be eligible under the Program.

1. Twelve (12) or more hours with one nonprofit organization completed solely by the employee seeking a volunteer match donation under this Program ;
2. The volunteer activity hours must occur after the employee's Great-West Financial hire date; and
3. The volunteer activity hours must occur within twelve (12) months of the Volunteer Matching Gift Application submission date.

Ineligible Volunteer Hours

- Group volunteer hours. Individual participants in a group volunteer activity may not combine their volunteer hours to reach the twelve (12) hour minimum requirement.

Volunteer Matching Gift Applications

A Volunteer Matching Gift Application must be submitted to the Community Partnership team within twelve (12) months of the volunteer date in order to be considered for a matching donation under the Program. To submit an application, please visit ESS and click on the My Community link.

Volunteer Matching Gift Applications are reviewed on a first come, first served basis by the Community Partnership team. The typical application is reviewed and processed within thirty (30) days of receipt by the Community Partnership team. This process may exceed thirty (30) days if additional documentation is required to determine eligibility. If additional documentation is needed, the Community Partnership team will make two (2) attempts to contact the organization and/or employee. If a response is not received within two (2) weeks of the second attempt, the application will be rejected. Employees can avoid a delay or application rejection due to a delay by reviewing the Matching Gift intranet page prior to submitting a Volunteer Matching Gift Application. Employees may resubmit rejected applications with additional documentation. Employees will receive updates on the application statuses by email.

Great-West Financial annually allocates its matching donations under the Program. Volunteer Matching Gift Applications submitted on or before the third Friday of December will apply to the current year and applications submitted after the third Friday of December will apply to the following year's funds.

Policy Compliance

All Great-West Financial employees submitting a Volunteer Matching Gift Application must acknowledge their understanding of this Volunteer Match Program Policy. Information, data, records and/or documentation provided with a Volunteer Matching Gift Application is subject to audit and verification. Failure to comply with the relevant policy and procedures may result, at the sole discretion of the company, in denial of matching requests and/or disciplinary action.

The submission of a Volunteer Matching Gift Application is not a guarantee of payment by Great-West Financial. A volunteer match donation to an organization by Great-West Financial is not to be construed as a contract between Great-West Financial and the recipient. Great-West Financial, the Great-West Financial employee and/or the benefiting organization do not have, nor shall they hold themselves out as having any right, power or authority to create any contract or obligation, either expressed or implied, on behalf of, in the name of, or binding upon the other parties. Intentional abuse of this program may result in disqualification of the Great-West Financial employee and/or the benefiting organization. Great-West Financial shall, in its sole authority, administer this Program.

Great-West Financial may suspend, change or cancel this Program at any time without notice.

Contact

For questions about this policy, please contact CommunityPartnership@greatwest.com.