



## **Adoption and Surrogacy Assistance Policy**

Effective **October 1, 2023**, Ryman Hospitality Properties and Opry Entertainment Group (each, an “Employer”) separately adopt this Adoption and Surrogacy Assistance Policy (the “Policy”), designed to provide certain financial reimbursement benefits to the Eligible Employees of each respective Employers. In general, the Policy provides Eligible Employees with up to \$5,000 in reimbursement of Qualified Expenses related to the adoption or surrogacy of an Eligible Child that were actually paid or incurred by the Eligible Employee.

### **Eligibility**

Except as provided under the exclusions below, an employee is eligible for adoption and surrogacy assistance under the Policy, if the employee:

- Is actively employed by an Employer for at least 90 days; and
- Is a regular full-time employee; and
- Has incurred eligible expense(s) related to an eligible event(s) (as defined herein) while actively employed by an Employer.

The above eligibility rules must be satisfied as of the first day that eligible expenses are incurred.

You will not be eligible for adoption and surrogacy assistance under this Policy, and reimbursement for eligible expenses will end, if your employment ends for any reason.

### **Exclusions**

The following employees or individuals are not eligible for adoption and surrogacy assistance –

- Employees who work part-time or variable hour schedules (e.g., Part-time, Casual, On-call positions).
- Employees who are classified as seasonal, temporary or interns.
- Leased employees, unless the leasing entity is an affiliated employer entity who has provided for eligibility under this Policy.
- Any individual who is classified as an independent contractor.

Eligibility for the Policy ends on the earlier of: (1) the date the Eligible Employee ceases to be an Eligible Employee for any reason; or (2) the date the Eligible Employee receives the maximum benefit under the Policy pursuant to the terms described herein.

## **Benefits**

An Eligible Employee who meets the Policy's conditions can obtain up to \$5,000 in reimbursement of Qualified Expenses if those expenses are incurred in connection with (1) the final, legal adoption of an Eligible Child who is not the stepchild of the adoptive parent ("adoption"); and/or (2) a legal arrangement between intended parent(s) and a surrogate carrier to carry an embryo to term as a means for the intended parent(s) to become parent(s) of a child ("surrogacy"), subject to the limits described below.

The benefit limit is two (2) children per lifetime per Eligible Employee/family, regardless of any combination of adoption and/or surrogacy. If both parents are Eligible Employees, the maximum benefit and lifetime limit of two (2) children applies to the combined expenses of both parents.

No benefits under this Policy will be paid for adoptions that are finalized, or the placement of a child in your home in connection with a surrogacy prior to your date of hire or prior to you becoming an Eligible Employee.

Adoptions that are finalized, or the placement of an Eligible Child in your home in connection with a surrogacy after you become an Eligible Employee will qualify for reimbursement of Qualified Expenses, provided that the Qualified Expenses for which you seek reimbursement were incurred while you were an employee of the Employer.

## **Eligible Child**

An Eligible Child must be under the age of eighteen or physically or mentally incapable of self-care. In addition, for surrogacy, the Eligible Child must be genetically related to the Eligible Employee or their spouse, be a legal dependent of the Eligible Employee and live in the household of the Eligible Employee.

## **Qualified Expenses**

Qualified Expenses are expenses reasonably and directly related to the adoption or surrogacy of an Eligible Child that were paid or incurred by the Eligible Employee and are not ineligible expenses.

### **Adoption**

For an adoption, Qualified Expenses for which you may seek reimbursement include:

- Adoption agency and placement fees (including home study fees)
- Attorney fees and court costs
- Immunizations required for the adoption (during the adoption process and prior to the finalization of the adoption)
- Reasonable and necessary transportation and lodging costs directly associated with the adoption
- Other expenses as determined by the Employer, consistent with the Instructions to IRS Form 8839

Ineligible expenses include:

- Medical examination fees for the adopting parents
- Cost of personal items such as clothing or food for either parents or child
- Expenses that violate state or federal law
- Expenses already paid or reimbursed by another employer or other party

### **Surrogacy**

For surrogacy, Qualified Expenses are properly documented legal expenses and reasonable and necessary transportation and lodging associated with surrogacy parenting arrangements for an Eligible Child.

Ineligible expenses include:

- Medical examination fees for the parents
- Cost of personal items such as clothing or food for either parents or child
- Fees paid to the surrogate for her services
- Fees paid to an egg donor or egg donor agency
- Long-term (more than thirty (30) days) storage of blood, umbilical cord, reproductive materials or other material (e.g., cryopreservation of tissue, blood and blood products)
- Expenses that violate state or federal law

**NOTE:** The total benefit limit is two (2) children per lifetime per Eligible Employee and surrogacy is combined with – not in addition to – the adoption benefit described above. If both parents are Eligible Employees, only one (1) parent is eligible for reimbursement per adoption or surrogacy.

### **Applying for Assistance under the Policy**

You may submit a reimbursement request for Qualified Expenses on or after the date the adoption is recognized as legal and final in the employee's state of residence (when the adoption takes place in the United States), at the time the adoptive parents receive the child (when the adoption takes place in a foreign country) or when the Eligible Child is placed in the Eligible Employee's home as a result of surrogacy. Reimbursements for Qualified Expenses may be requested by:

- Submitting a signed and fully completed "Adoption and Surrogacy Assistance Reimbursement Form" (available on the Plan Documents and Policy Information library in ADP) to the address below within six (6) months after the date the adoption is finalized or the child is placed in your home as a result of surrogacy; and
- Attaching copies of all expenses, canceled checks, or other evidence substantiating the amount and nature of the expenses, and in the case of an adoption, a copy of the signed court documents legalizing the adoption (e.g., final decree of adoption).

Acceptable documentation for foreign adoptions includes the following:

- The adoption decree tax from the foreign country
- A copy of the child's passport from the foreign country, including the last name of the adoptive parents
- A copy of the child's revised birth certificate, with the last name of the adoptive parents

**NOTE:** If the documents are not in English, please provide an English translation.

Submit your reimbursement form and documentation to:

Electronic Delivery (email):

***totalrewards@rymanhp.com***

Physical Delivery (mail):

***Ryman Hospitality Properties, Inc.  
Attn: Total Rewards Department  
One Gaylord Drive  
Nashville, Tennessee 37214***

The information will be held in the strictest confidence by the Total Rewards Department, in a file separate from your personnel records.

Requests for reimbursement not submitted within six (6) months following the date the adoption becomes final, or the date the Eligible Child was placed in your home in connection with surrogacy, as applicable, will not be considered. Timely requests for reimbursement will generally be approved or denied by your Employer, in writing, within thirty (30) days. If a reimbursement check is returned as undeliverable or not cashed within one (1) year after it is issued, the reimbursement will revert to the Employer to the extent permissible under applicable state law.

### **Leave of Absence in Connection with Surrogacy or Adoption**

Under the Ryman Hospitality Properties Paid Parental Leave Policy, up to four (4) weeks of paid parental leave at full pay is available to Eligible Employees who adopt or have an Eligible Child through surrogacy. Leave may be utilized at the time the child is placed in the home for adoption or as a result of surrogacy, for mandated home studies or for travel to another jurisdiction or country for purposes of adoption or surrogacy. Leave must be taken in accordance with the terms and conditions of the Paid Parental Leave Policy. Refer to the Paid Parental Leave Policy for more information.

### **Important Tax Considerations**

Generally, benefits paid under this Policy are intended to be excludable from employees' income for federal income tax purposes to the extent permitted under Internal Revenue Code §137. This means that, generally, the adoption assistance benefit under the Policy will be exempt from federal income tax, while the surrogacy assistance benefit under the Policy will be taxable.

**Employees are responsible for understanding the tax treatment of reimbursements under this Policy and for claiming the applicable income exclusion by filing Form 8839 with their federal income tax returns.** (Form 8839 and its instructions are available from the IRS and on the IRS website at [www.irs.gov](http://www.irs.gov)). Because the tax laws are subject to change and each person's situation is different, we strongly encourage you to consult a tax advisor about the laws and the best tax strategy for you in connection with the benefits offered under this Policy.

## General Provisions

Ryman Corporate Properties, LLC (“Ryman Hospitality Properties”) administers this policy for both Employers and reserves the right at any time, and from time to time, without prior notice to modify, alter, amend or terminate the Policy. This Policy is not intended to, nor does it constitute or create a contract of employment with any Eligible Employee. This Policy is intended to be applied in accordance with all applicable federal, state and local laws. Ryman Corporate Properties, LLC has absolute discretion to make the sole and final determination as to any and all issues arising out of this Policy.

Benefits under the Policy do not constitute entitlement and are not vested. Benefits under the Policy are discretionary and may be paid only if actually used for the purposes and within the timeframe set forth in this Policy.

The Employers strictly prohibit any form of retaliation or discrimination against an employee for attempting to request reimbursement for Qualified Expenses under the Policy.

Employees are not required or permitted to contribute to the Policy. All Policy benefits are paid by the Employer from its general assets.

Each Employer intends to continue the Policy indefinitely, but has the right to terminate or amend the Policy at any time.

If you have any questions, you should contact the Ryman Hospitality Properties Total Rewards department at [\*\*totalrewards@rymanhp.com\*\*](mailto:totalrewards@rymanhp.com).