

# **EQUIFAX INC.**

## **ADOPTION ASSISTANCE POLICY**

**April 1, 2018**

Effective April 1, 2018, Equifax Inc. (“Equifax”) has adopted an Adoption Assistance Policy (“Policy”) for all Eligible Employees of Equifax. In general, the Policy reimburses Eligible Employees up to \$5,000 in Qualifying Adoption Expenses for the adoption of an Eligible Child.

This Policy may be amended, revised or terminated at Equifax’s sole discretion at any time without prior notice. This Policy is not intended to nor does it constitute or create a contract of employment with any Eligible Employee. Equifax has absolute discretion to make the sole and final determination as to any and all issues arising out of this Policy.

### **Eligibility**

Except as provided under the exclusions below, the following Equifax employees are eligible for adoption assistance under the Policy (“Eligible Employees”), if the employee –

- Is actively employed;
- Is regularly scheduled to work at least 25 hours per week;
- Has satisfied the waiting period requirements set forth below; and
- Has assumed physical or legal custody of the Eligible Child while actively employed by Equifax and after satisfying the waiting period requirement.

The above eligibility rules must be satisfied as of the day the Eligible Employee assumes physical or legal custody of the Eligible Child.

### *Eligible Child*

An Eligible Child is any individual –

- Who has not attained age 18;
- Who is not related to you or your spouse/partner; and
- For whom at least one adoptive parent is an Eligible Employee.

For this purpose, an Eligible Child does not include any of the following –

- Your or your spouse’s/partner’s grandchild, niece, nephew, cousin, brother, sister or stepchild; or
- A child for whom you or your spouse/partner are the legal guardian, unless the Eligible Employee is required by state law to become the child’s legal guardian prior to the adoption being Finalized, as defined below.

### *Waiting Period Requirement*

You are eligible for adoption assistance under the Policy (provided you satisfy all other eligibility requirements), the first day of the month following your date of hire or rehire. If you are hired or rehired on the first day of the month, you are eligible on the first day of the following month (provided you satisfy all other eligibility requirements).

### *Exclusions*

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

- Employees whose primary work location is outside of the United States.
- Employees who are paid from a payroll that is administered outside of the United States.
- Any individual who is classified as an independent contractor or contingent worker.
- Employees who are classified as seasonal, temporary or interns.
- Leased employees, unless the leasing entity is an Equifax entity who has provided for eligibility under this Policy.
- Employees who assume physical or legal custody of a child prior to commencement of employment with Equifax.

### *Special Rule for Adoptions Finalized Between January 1, 2018 and March 31, 2018*

Adoptions that were Finalized prior to January 1, 2018 are not covered by this Policy. Adoptions that were Finalized on or after January 1, 2018 and prior to April 1, 2018 are covered only if you satisfy the following requirements –

- You must have satisfied all the requirements of an Eligible Employee and an Eligible Child at the time you took physical or legal custody of the Eligible Child,
- You must be an active employee of Equifax or on an authorized leave of absence on April 1, 2018,
- You must satisfy all other requirements of the Policy, and
- You must file for reimbursement of your Qualifying Adoption Expenses within six months following the date that the adoption was Finalized.

### **Adoption Assistance under this Policy**

You may be reimbursed up to \$5,000 of Qualifying Adoption Expenses for the adoption of an Eligible Child. If you adopt more than one Eligible Child, each adoption will be considered separately. If both adoptive parents are Equifax employees, only one employee will receive reimbursement under this policy. You are eligible to be reimbursed for your Qualifying Adoption Expenses when the adoption is Final, as long as you are still actively employed by Equifax on the date that the adoption is Finalized.

If you are on an authorized leave of absence (which includes STD or LTD leave, FMLA, and USERRA) on the date that the adoption is Finalized, you must have qualified as an Eligible Employee and begun adoption proceedings prior to your last day of active work. Your Qualifying Adoption Expenses will then be eligible to be reimbursed once the adoption is Final.

### *Finalized Adoptions*

An adoption is Final or Finalized when an applicable court of competent jurisdiction enters a final order approving the adoption or takes other action making the adoption final and binding without the need for further legal action. This date is determined in the sole discretion of the Company.

### *Filing for Reimbursement*

Once the adoption is Final, you must submit your documentation for all of your Qualifying Adoption Expenses using an applicable reimbursement request form, which can be obtained from People Link. If you have any questions about filing for reimbursement, please create an AskHR case from the home page of People Link and a representative of HR People Services will assist you. You must submit your request for reimbursement no later than six months following the date that the adoption is Final.

Reimbursement of Qualifying Adoption Expenses will be reported on your Form W-2. This amount is subject to Social Security and Medicare taxes and may be subject to federal and state income taxes if your modified adjusted gross income is more than a threshold amount that is adjusted for inflation each year. To determine if the reimbursements you are applying for are excludable from your gross income, refer to the instructions on IRS Form 8839 at <https://www.irs.gov/pub/irs-pdf/i8839.pdf> or consult with your legal or tax advisor.

### *Qualifying Adoption Expenses*

Qualifying Adoption Expenses are expenses that are directly related to the adoption of an Eligible Child. Equifax will determine whether a particular expense satisfies the definition of a Qualifying Adoption Expense based on applicable law and this Policy. Qualifying Adoption Expenses include –

- Public and private adoption agency fees.
- Foreign adoption and agency fees.
- Temporary foster care charges.
- Home inspection costs.
- Travel and other direct costs incurred in transporting the Eligible Child to the adoptive parent's home.
- Legal and court fees directly related to the adoption.

### *Expenses Not Covered*

Qualifying Adoption Expenses do not include the following –

- Any expense not paid by you, including expenses that are paid or reimbursed by charitable organizations, or federal, state or foreign agencies.
- Any expense for which you would not be required to pay (including, for example, pro bono legal costs).

- Any costs relating to the adoption of a child who is not an Eligible Child.
- Any costs associated with failed adoptions or adoptions that have not been Finalized.
- Everyday Living Expenses (as defined below) relating to an Eligible Child.
- Improvements to, additions to, alterations of or maintenance performed on a house, apartment, condominium, townhouse or other real property (including, for example, painting an adopted child's bedroom).
- Any expenses that are not properly substantiated with written receipts or other acceptable written documentation.
- Any other expenses not related to the adoption as determined by Equifax using applicable IRS rules.

For purposes of the above, Everyday Living Expenses means any expenses relating to the daily or routine care of an Eligible Child, including clothing, food, toiletries, diapers, furniture, personal affects, shelter, supplies and other accessories. Everyday Living Expenses are not reimbursable under this Policy.

### **Other Important Information**

#### *Paid Parental Leave*

Once the adoption is Final, you may also be eligible for paid parental leave from Equifax and, depending on your state of residence, paid parental leave from a state-sponsored program as well. Please see the Equifax Paid Parental Leave Policy on People Link for further information.

#### *Taxation of Benefits*

As noted above, the adoption assistance will be reported on your Form W-2. The amount may be subject to federal and state income taxes depending on your modified adjusted gross income. The Policy is designed to provide Eligible Employees adoption assistance that could be eligible for exclusion from the Eligible Employee's taxable income. However, it is your responsibility to file any applicable tax forms with your Federal and state income tax returns in order to exclude the adoption assistance from your taxable income (if eligible). Equifax does not guaranty that the adoption assistance provided under the Policy will be excluded from your taxable income.

#### *Anti-Retaliation Policy*

Equifax strictly prohibits any form of retaliation or discrimination against an employee for attempting to use or using adoption assistance under the Policy.

Last Updated March 8, 2018