

**BOARD OF TRUSTEES**  
**KAISER ALUMINUM SALARIED RETIREES VEBA TRUST**

P.O. Box 2308 - Stockton, California 95201-2308

April 2021

**Re: Kaiser Aluminum Salaried Retirees VEBA Plan  
2021 Qualified Benefit Reimbursement Program**

Dear Fellow Retiree or Surviving Spouse and Family:

**This is to advise you that the Board of Trustees (the “Board”) of the Kaiser Aluminum Salaried VEBA Trust (the “VEBA”) has declared an available annual benefit amount of up to \$5,000 per Family Unit (as defined in the Plan) for 2021 under the Kaiser Aluminum Salaried Retirees VEBA Plan (“Plan”).**

This amount is for 2021 covered expenses only, and does not depend on the number of eligible individuals in your Family Unit. Please note that if both members of a couple each separately qualify as a retiree under the Plan, each will be considered a separate Family Unit entitled to the full \$5,000 annual benefit for 2021 expenses. If one member of your Family Unit passes away or otherwise becomes ineligible during 2021, the entire \$5,000 amount remains available to the remaining eligible Family Unit members for the remainder of the year, subject to the terms of the Plan. In no event, however, will a member of a Family Unit become entitled to claim expenses in excess of the full annual benefit.

Enclosed are a 2021 Qualified Benefit Reimbursement Request Form (the “2021 Request Form”) and a return envelope that can be used for the purpose of claiming your 2021 Qualified Benefits (as defined in the Plan).

Please note that all 2021 Request Forms must be filed with the Third Party Administrator, Delta Fund Administrators, LLC (“Delta”), at the address indicated at the top of the 2021 Request Form on or before December 31, 2022, subject to any applicable extension resulting from the Tolling Period (as defined and more fully described in the enclosed Summary of Material Modifications (“SMM”). If your 2021 Request Form is not filed by the applicable deadline, then your rights to receive a Qualified Benefit for the 2021 Plan Year (or any portion thereof not already claimed) shall expire and be forfeited.

**PLEASE NOTE: Regarding the impact of COVID-19 on the administration of the Plan, Delta reports that they are continuing normal operations. If, however, delays in claims payment and response to phone calls should occur, we know you will understand and be patient.**

**OUTBREAK PERIOD UPDATE**

You were previously informed that effective as of March 1, 2020, the Plan was required to disregard the “Outbreak Period” (i.e., 60 days after the announced end of the COVID-19 National Emergency Period) in determining certain deadlines. New guidance issued by the U.S. Department of Labor explains how this tolling period works. Please see the enclosed SMM

for information and examples about how the tolling period impacts certain Plan deadlines, such as extending the deadline to submit 2019 and 2020 claims.

### **NEW INVESTMENT MANAGER**

The Board has engaged Vanguard Institutional Advisory Services (“Vanguard”) to serve as the non-discretionary, fiduciary investment advisor (the “investment advisor”) to the VEBA. Formerly, Capital Group served as the investment advisor to the VEBA. In late 2020, Capital Group notified the Board that it would no longer provide fiduciary services to the VEBA. Upon receiving such notification, the Board initiated a request for proposal (“RFP”) from numerous vendors. Based on careful review and deliberation (including reviewing written responses to the RFP and supplemental questions, interviews and similar actions), the Board determined that Vanguard was the most qualified to serve as the VEBA’s investment advisor, starting in the first quarter of 2021.

### **NOTABLE PLAN PROVISIONS**

Below is a brief discussion of certain Plan provisions, but note that this is only a summary and the actual Plan documents control. Please make sure you are familiar with these items, as they may affect your reimbursement. For more information, see the Plan’s summary plan description (the “SPD”). If you need another copy of the SPD, call Delta at the number provided in the section of this letter titled “Contacting the Third Party Administrator.”

**After-Tax Premiums.** **The Plan only reimburses health care premiums and premiums for qualified long term care insurance that were paid on an after-tax basis** and not claimed as a deduction on your personal income tax return. If you pay premiums under an employer-sponsored health plan through pre-tax payroll deduction or claim a deduction for the premiums on your personal income tax return, those expenses are not eligible for reimbursement under the Plan.

**Long Term Care.** The Plan reimburses premiums paid for a “qualified long-term care insurance contract.” A qualified long-term care insurance contract is defined by Internal Revenue Code Section 7702B(b) as any insurance policy where (A) the policy only covers qualified long term care services, (B) the policy does not cover expenses covered by Medicare as a primary payor, (C) the policy is guaranteed renewable, (D) the policy does not provide for a cash surrender value or other money that can be paid, assigned, or pledged as collateral for a loan, or borrowed, except in limited circumstances, (E) all premium refunds and policyholder dividends are, with limited exceptions, applied as a reduction in future premiums or to increase future benefits, and (F) the policy satisfies the consumer protection provisions in Internal Revenue Code Section 7702B(g). Please contact your long term care insurance carrier or broker to determine if your policy qualifies as a “qualified long-term care insurance contract.” Only qualified long term care insurance contact premiums paid for 2021 coverage that you do not deduct on your federal personal income tax return and that do not exceed the Plan’s 2021 annual limits set forth in Appendix A to the 2021 claim form are reimbursable by the Plan.

Only a portion of the premiums you pay for a qualified long term care insurance contract is reimbursable by the Plan. You are not entitled to a benefit in excess of the annual maximum benefit under the Plan to reimburse your long term care insurance premiums; reimbursements of

long term care insurance premiums reduce the amount of your annual Plan benefit available for other coverage. Please keep this in mind when deciding whether to purchase long term care insurance.

### **A REMINDER ON ELIGIBILITY**

To be eligible to participate in the Plan as a retiree, you must have begun to accrue credited service under the Kaiser Retirement Plan (“KRP”) prior to February 1, 2002 and have retired or will retire in the future, as well as be eligible under the original Kaiser Aluminum Salaried Retirees Medical Plan (i.e., full retirement under KRP). For a full explanation of eligibility rules, see the SPD.

**For your spouse to be eligible for benefits, your marriage must have taken place prior to the first day of the month following your retirement date.** In the event of divorce or legal separation, your spouse will no longer be eligible for benefits under the Plan (except through COBRA, if timely elected). In the event you remarry, your new spouse will not be eligible for benefits. A surviving spouse who remarries will lose eligibility under the Plan.

You may not receive a reimbursement for anyone who has not been listed on an Enrollment Form. You do not have to re-enroll every year.

If you are rehired by Kaiser Aluminum or any of its affiliates or subsidiaries, you and your Family Unit members will immediately cease to be eligible for this Plan, regardless of whether you are eligible or enrolled for employee health benefits from Kaiser Aluminum while a rehired employee. You may not submit any expenses incurred by any member of your Family Unit during your period of re-employment to the Plan for reimbursement. Upon a subsequent termination of employment, you will once again become covered under the Plan without the need to re-enroll.

If you or a member of your Family Unit is age 65 or older, to be eligible for the Plan that person must enroll in Medicare Part A as of their first date of eligibility for Medicare or contact Delta to request a waiver of this requirement before reaching age 65.

### **PLAN BENEFITS**

The Plan will reimburse you for health care insurance premiums you paid (such as medical, dental, vision, and drug plan premiums) and for Medicare Part B or Part D premiums, or Medicare supplement insurance premiums. This includes premiums you pay directly to insurance carriers or HMOs (e.g., Blue Cross, Kaiser Permanente, etc.) or contributions you make on an after-tax basis for employer-sponsored health care benefits. The Plan will also reimburse you and your eligible dependents for a portion of the premiums that you pay for qualified long term care insurance.

The Plan will not reimburse you for disability insurance premiums, prescription drug discount cards, or for specific disease or hospital indemnity policies. It also will not reimburse you for any co-pays, deductibles or any other out-of-pocket expenses imposed by your health care plan or provider.

## **MEDICARE PART B OR PART D PREMIUMS**

If you intend to claim Medicare Part B or Part D premium expenses for 2021, please read the following:

**Medicare Part B Premiums.** Premiums paid for Medicare Part B coverage during 2021 are not the same for every enrollee. Medicare Part B premiums are payable directly or through deductions to Social Security benefits, and some individuals must pay an income-related monthly adjustment amount in addition to the standard Part B premium. For this reason, there is no standard 2021 Medicare Part B premium rate that the Plan can use for reimbursement of 2021 Medicare Part B premiums. You will have to attach both proof of coverage under Medicare Part B and proof of the amount of and payment of the applicable premiums.

**Medicare Part D Prescription Drug Premiums.** Prescription drug coverage may be included in a Medicare HMO program such as the Kaiser Permanente Senior Advantage program where participation is a mandatory feature of the program. Medicare Part D premiums are payable directly or through deductions to Social Security benefits, and some individuals must pay an income-related monthly adjustment amount in addition to the standard Part D premium. For these reasons, there is no standard 2021 Medicare Part D premium rate that the Plan can use for reimbursement of 2021 Medicare Part D premiums. Accordingly, if you are claiming reimbursement of 2021 Medicare Part D premiums, you will have to attach both proof of coverage under the Medicare Part D policy, plan or program in which you participate and proof of the amount of and payment of the applicable premiums.

## **CONTACTING THE THIRD PARTY ADMINISTRATOR**

**If you have questions concerning the Plan or require additional benefit forms and materials, please contact the Plan's Third Party Administrator at the following mailing address, telephone number, or e-mail address.**

**Delta Fund Administrators, LLC  
P.O. Box 2308  
Stockton, CA 95201-2308  
Tel.: Toll-Free (888) 344-8322  
Email: VEBA@Deltafund.com**

***For Federal Express Delivery:***

**Delta Fund Administrators, LLC  
1234 West Oak Street  
Stockton, CA 95203**

**If you are receiving COBRA or Bankruptcy COBRA benefits from Kaiser Aluminum and have questions concerning those benefit plans, please contact:**

Samantha Seger  
Kaiser Aluminum  
27422 Portola Parkway, Suite 200  
Foothill Ranch, CA 92610-2831  
Tel.: (949) 614-1747  
E-mail: Samantha.Seger@kaiseral.com

**Delta is not able to answer any questions concerning COBRA or Bankruptcy COBRA benefits from Kaiser Aluminum or any questions concerning Kaiser Aluminum's benefit plans.**

**IF YOU MOVE**

**When you move, please remember to notify Delta of your change of address.** If we are unable to contact you, you may miss out on important information concerning the Plan, including benefit amounts, Plan design changes and claim filing deadlines and forms.

**HEALTH INCAPACITY**

To assure continued participation in the Plan in the event you become incapacitated, it is important that you make another family member aware of the Plan and how it works. We also suggest that you maintain a Plan file for these benefit announcements and forms.

Sincerely,

The Board of Trustees of the Kaiser Aluminum Salaried Retirees VEBA Trust

Douglas G. Allen  
Chairman of the Board

John E. Daniel  
Trustee

Richard Byrne  
Trustee

**Kaiser Aluminum Salaried Retirees VEBA Plan**  
**Summary of Material Modifications—COVID-19 Tolling Period for Certain Deadlines**

This notice constitutes the “Summary of Material Modifications” (“SMM”) for the Kaiser Aluminum Salaried Retirees VEBA Plan (the “Plan”) and supplements the Summary Plan Description (the “SPD”) for the Plan. In the event of any conflict between the terms of this notice and any other document or representation (oral or otherwise), this notice shall control. Moreover, unless otherwise specified herein, all other portions of the Plan continue to apply. The Plan can be amended or terminated in whole or in part at any time by the Board of Trustees of the Kaiser Aluminum Salaried Retirees VEBA Trust.

**Summary.** Due to the COVID-19 pandemic, certain deadlines for taking action under the Plan were tolled. Under recent federal guidance, the U.S. Department of Labor (“DOL”) has clarified the duration of this extension, specifying the duration of the tolling period as it applies to certain deadlines. This document explains the tolling period and provides examples of how the tolling period may apply in different situations.

**COVID-19.** Since March 1, 2020, the Plan was required to disregard the “Outbreak Period” in determining certain deadlines due to the COVID-19 National Emergency. The “Outbreak Period” is the period from March 1, 2020 until 60 days after the announced end of the COVID-19 National Emergency Period. As a result, certain deadlines under the Plan were tolled during the Outbreak Period. New DOL guidance clarifies that the tolling period will not extend beyond one year (the “Tolling Period”).

**Extended Time Period to File Claims and Appeals**

Specifically, the Tolling Period ends on the **earlier** of:

1. One year from the date the individual was first eligible for relief, or
2. 60 days from the end of the National Emergency Period (i.e., the end of the Outbreak Period).

As of the date of this SMM, there has not been an announced end of the COVID-19 National Emergency Period. Note that in the event that the COVID-19 National Emergency Period is declared, the deadlines in the following examples may be accelerated to an earlier date.

For the Tolling Period to apply, the time period to file a claim or appeal must occur during the Outbreak Period. Below are some examples of how this works.

**Filing a claim:**

- 2019 Benefit Claims: Participant A would normally have 365 days after the close of the preceding plan year—until December 31, 2020—to submit a claim for 2019 benefits. Participant A now has from the **earlier** of December 31, 2021 or the end of the Outbreak Period to file a claim for the 2019 plan year.
- 2020 Benefit Claims: Participant B would normally have 365 days after the close of the preceding plan year – until December 31, 2021 – to submit a claim for 2020 benefits. Participant B now has from the **earlier** of December 31, 2022 or the end of the Outbreak Period to file a claim for the 2020 plan year.

Filing an appeal:

- Participant C filed a claim under the Plan and received a denial letter on April 1, 2020. Normally, for that claim, Participant C would have 180 days to file an appeal (by September 28, 2020). Participant C now has until the **earlier** of September 28, 2021 or the end of the Outbreak Period to file an appeal.
- Participant D files a claim under the Plan and receives a denial letter on May 15, 2021. Normally for that claim, Participant D would have 180 days to file an appeal (by November 11, 2021). Participant D now has until the **earlier** of November 11, 2022 or the end of the Outbreak Period to file an appeal.

**Please Note:** *It remains encouraged that claims for 2019 and 2020 are submitted as soon as possible.*

There are several ways to file your claim:

- 1) Send Via Mail: Kaiser Aluminum Salaried Retirees VEBA Plan  
P.O Box 2308  
Stockton, CA 95201-2308
- 2) Send Via Fax: 1 (209) 940-5135
- 3) Send Via Email: VEBA@deltafund.com

If you have any questions regarding this SMM, please contact Delta Fund Administrators at 1 (888) 344-8322 or at VEBA@deltafund.com and they will be happy to assist you.