Trump Account Contribution Program

Program Policy Document

1. Purpose

The purpose of the Trump Account Contribution Program (TACP) is to provide eligible employees of NRP Investments LLC (NRP) with an annual employer matching contribution for eligible dependent children who have an active Trump Account (Account) established in the child's name.

Under the approved program design, NRP will make an annual matching contribution of up to $500 per eligible dependent child, provided the employee satisfies the applicable service, employment, dependent verification, account documentation, employee contribution, and submission requirements as provided in Section 5 below.

This program is being established based on the current legislative framework and available guidance. NRP may modify this program as needed to reflect future federal guidance, legal requirements, administrative feasibility, nondiscrimination testing requirements, payroll requirements, or business considerations.

2. Effective Date and Program Year

The program effective date is July 4, 2026. The program year is the calendar year.

For the initial 2026 program year, the employee submission deadline is November 1, 2026. Approved employer contributions are expected to be processed through the December 11, 2026 payroll cycle. In future years, contributions are expected to be processed on the first regular payroll date in December, subject to final plan terms and administrative requirements.

3. Plan Sponsor and Plan Administrator

The plan sponsor is NRP Investments LLC.

The plan administrator is NRP Investments LLC, acting through its Human Resources, Benefits, Payroll, Finance, Workday or HRIS, Legal, and other designated administrative teams.

NRP may delegate administrative responsibilities to internal departments, external advisors, payroll providers, legal counsel, benefits consultants, or other third party service providers as needed to administer the program.

4. Nature of the Benefit

The program provides an annual employer matching contribution to an eligible child's active Account. The contribution is not automatic. The employee must first make a qualifying contribution to the child's Account and must submit acceptable proof showing that the employee made the contribution.

NRP will match the employee's qualifying contribution for each eligible child, up to a maximum employer contribution of $500 per eligible child per program year. An example of the matching program is as follows:

Employee Contribution for Child	NRP Match
$100	$100
$250	$250
$500	$500
$750	$500

5. Employee Eligibility

An employee is eligible to participate in the program for a program year only if all requirements below are satisfied.

- The employee is employed by NRP on the contribution processing date.
- The employee has at least two years of service as of December 31 of the applicable program year.
- The employee has an eligible dependent child who satisfies the requirements of this policy.
- The employee made a qualifying contribution to the eligible child's active Account.
- The employee submitted all required documentation by the applicable submission deadline.
- The employee's submission was reviewed and approved by HR Benefits or another designated NRP administrator.

6. Service Requirement

The service requirement is based on the employee's continuous service date listed in Workday.

To satisfy the service requirement for a program year, the employee must have at least two years of service as of December 31 of that program year.

If an employee will satisfy the two year service requirement by December 31 of the applicable program year and remains employed on the contribution processing date, the employee will be treated as eligible, provided all other requirements are met.

7. Eligible Dependent Child

An eligible dependent child means a child who satisfies all requirements below.

- The child is under age 18 for that calendar year.

- The child has a valid Social Security number.
- The child has an active Account established in the child's name.
- The child is the employee's biological child or legally adopted child.
- The child is not a grandchild, niece, nephew, friend, or other nonqualifying dependent relationship.
- The employee submits the required dependent verification information and account documentation by the applicable deadline.

8. Required Dependent and Account Information

- Child's full legal name.
- Child's date of birth.
- Child's Social Security number.
- Documentation confirming that the child has an active Trump Account.
- Documentation confirming that the employee made a qualifying contribution to the child's Trump Account.
- Any other information required by NRP, legal counsel, payroll, or future federal guidance.

9. Employer Contribution Amount and Limits

For the 2026 program year, the employer contribution is an annual match of up to $500 per eligible dependent child. This amount goes toward the $5,000 annual cap on contributions for the child.

Only one NRP contribution may be made for the same child for the same program year. If more than one NRP employee attempts to claim the same child, NRP will approve the first complete and eligible submission received, provided the submission satisfies all program requirements.

The maximum contribution per employee per year is subject to the statutory cap under IRC Section 128. The approved plan design identifies the maximum per employee per year as up to $2,500, covering up to five eligible children at $500 each.

NRP's contribution is excluded from the employee's gross income. NRP will make the contribution to the employee and it is the employee's responsibility to deposit the contribution into the child's TACP account within the tax year.

The approved plan design identifies a lifetime cap per child of $9,000 total. Once contributed, there is no vesting schedule and no clawback right.

10. Submission Deadline and Method

For the 2026 program year, the submission deadline is November 1, 2026. No late submissions will be accepted for the 2026 program year.

Employees must submit requests through the designated Workday ticket process using the category titled Trump Account Contribution Program, unless NRP communicates a different submission process.

A submission will not be considered complete until all required documentation has been received and attached to the Workday ticket.

11. Acceptable Proof of Employee Contribution

Acceptable proof of employee contribution must clearly show the child's name, Account information or confirmation, contribution amount, contribution date or transaction date, and that the employee made the contribution.

Examples may include account statements, transaction confirmations, trustee or custodian confirmations, receipts, contribution confirmations, or other documentation approved by HR Benefits.

One document may support multiple children if it clearly shows all required information for each child and confirms that the employee made the contribution for each child.

12. Approval and Denial Process

HR Benefits, Payroll, or another designated NRP administrator will review employee submissions. A submission may be approved only when all program requirements are satisfied.

If a submission is denied, NRP will issue a separate denial notice stating the reason for denial. A denial is final unless HR Benefits identifies an internal processing error.

13. Contribution Processing

Approved contributions will be processed through the regular payroll cycle only to the employee. It is the employee's responsibility to deposit the contribution into the child's account within the tax year. For the 2026 program year, approved contributions are expected to be processed through the December 11, 2026 payroll cycle.

Corrections may be processed after the regular payroll cycle only if necessary to address an internal processing error or another correction approved by HR Benefits and Payroll.

14. Employment Status at Processing

The employee must be employed by NRP on the contribution processing date to receive the employer contribution.

If an employee's submission is approved but the employee's employment ends before the contribution is processed, the employee will not receive the employer contribution.

If an employee remains employed on the contribution processing date and otherwise satisfies the eligibility requirements, the employee may receive the contribution even if the employee is not actively at work due to an approved leave or other employment status, unless future guidance, legal counsel, or NRP policy requires a different rule.

15. Intended Tax Treatment and Payroll Coding

NRP intends to administer the program as a nontaxable employer contribution, subject to applicable law, payroll requirements, and final guidance.

Payroll will configure the contribution in a manner intended to support the IRC Section 128 exclusion. Payroll will work with HR Benefits, Finance, legal counsel, and any applicable payroll vendor to confirm the appropriate earnings code, tax treatment, reporting treatment, and correction process.

16. Nondiscrimination Testing and Compliance Review

NRP will monitor nondiscrimination testing requirements as federal guidance becomes available. NRP intends to conduct an initial nondiscrimination testing analysis in Q1 2027 based on actual year one enrollment and contribution data and engage legal counsel to review the results.

17. Privacy and Recordkeeping

The program requires employees to submit sensitive dependent information, including child name, date of birth, Social Security number, and account documentation.

NRP will maintain submitted information in accordance with applicable privacy, data security, document retention, payroll, benefits, tax, and internal access requirements. Access should be limited to individuals with a legitimate business need to review, approve, process, audit, or administer the program.

18. Amendment or Termination

NRP reserves the right to amend, suspend, or terminate the program at any time, in whole or in part. Reasons may include changes in federal law or guidance, tax treatment, ERISA or benefits compliance requirements, nondiscrimination testing concerns, administrative feasibility, payroll or system limitations, cost considerations, business needs, legal counsel recommendation, or any other reason determined by NRP.

19. Reservation of Discretion

NRP has discretionary authority to interpret the plan, determine eligibility, resolve ambiguities, review documentation, approve or deny submissions, correct administrative errors, and make all determinations necessary to administer the program.

20. No Employment Contract

This program does not create a contract of employment or alter the at will employment relationship between NRP and any employee. Participation does not guarantee continued employment, future eligibility, future contributions, or continuation of the program.