

# **SOUTHERN ILLINOIS LABORERS' AND EMPLOYERS' HEALTH & WELFARE AND ANNUITY FUNDS**

## **MISSING PARTICIPANT PROCEDURES**

### **I. Purpose**

The Board of Trustees of the Southern Illinois Laborers' and Employers' Annuity Fund and Southern Illinois Laborers' and Employers' Health & Welfare Fund ("Funds") is committed to ensuring that each of the Funds' Participants and/or beneficiaries (collectively "Participants") are aware of their fund accounts maintained for their benefit. The Board is further committed to taking reasonable steps to locate Participants in order to confirm that each Participant is aware of his or her account and to provide the Participant with notice of his rights to manage his account in conformity with the Funds' rules. In addition, the Board is committed to locating participants for the purpose of issuing required minimum distributions ("RMD's) under Internal Revenue Code §401(a)(9).

### **II. Scope**

These procedures apply to:

- Active participants with returned mail or invalid contact information;
- Terminated vested participants;
- Returned Explanation of Benefit, COBRA, and claim reimbursement mailings;
- Beneficiaries entitled to benefits; and
- Participants and beneficiaries who have reached, or will soon reach, their required beginning date for RMD's.

### **III. Procedures**

The Board of Trustees of the Funds have determined that the Funds' Administrative Manager (or such employee(s) designated by the Administrative Manager) shall take the following steps to locate a missing Participant. A Participant shall be considered a "missing Participant" when the Participant fails to respond to the Fund Administrative Manager's notice sent via first class mail or electronic notification. A failure to respond will include Individual Account Statements for Participants that are returned as undeliverable. The Funds' Administrative Manager shall utilize the following methods until the Participant is located:

#### **1. Certified Mail:**

The applicable notice shall be sent via certified mail to the Participant at the Participant's last known address. Any notice that is returned with a new forwarding address from the Post Office may, however, first be re-sent via first class to the listed forwarding address.

## **2. Check related Plan and Employer Records:**

If the Participant fails to respond to the mailing of the notice via Certified Mail, then the Fund Administrative Manager shall contact the Participant's last known Local Union, Employer or another of the Employer's plans, such as a group health plan, who may have more up-to-date information. If there are privacy concerns, the Fund Administrative Manager may request that the Local Union, Employer, or other plan fiduciary, contact or forward a letter for the Fund to the missing Participant.

## **3. Check with Designated Plan Beneficiary**

If the Participant is still not able to be located, then the Funds' Administrative Manager shall try to identify and contact any individual that the missing Participant has designated as a beneficiary (*i.e. spouse, children, etc.*) to find updated contact information for the missing Participant. If there are privacy concerns, the Fund Administrative Manager may request that the designated beneficiary, contact or forward a letter for the Funds' to the missing Participant.

## **4. Free Electronic Search Tools**

If the Funds' Administrative Manager is still not able to locate the missing Participant, then the Funds' Administrative Manager shall make reasonable use of Internet search tools that do not charge a fee to search for a missing Participant or beneficiary. Such online services include Internet search engines, public record databases, obituaries, and social media.

## **5. Annual Search Procedures**

The Fund Administrator shall, on an annual basis, submit all missing Participants with an Individual Account balance to the Funds' commercial locator service, or at such additional intervals the Fund Administrator determines to be necessary and reasonable based on the number of missing participants at issue and for the proper administration of the Funds.

## **6. Additional Search Steps**

If the Funds' Administrative Manager followed the required search steps delineated above, but was unable to locate the missing Participant, then the Funds' Administrative Manager shall notify the Board of Trustees and the Board shall determine whether additional search steps are appropriate. The Board shall consider the size of the Participant's account balance and the cost of further search efforts in deciding if any additional search steps are

appropriate. The possible additional search steps include the use of Internet search tools, specialized commercial locator services outside of the Fund's regularly engaged locator service, credit reporting agencies, information brokers, investigation databases and analogous services that may involve charges.

#### IV. Documentation

The Funds' Administrative Manager shall document the methods that it utilizes in accordance with the steps set forth in Article II of this Policy by completing the form or otherwise retaining the information that is attached hereto as *Exhibit "1"*. The completion of this form and/or retention of the information listed on the form will allow the Funds' Administrative Manager and the Board of Trustees to readily ascertain the methods utilized and to determine future action(s) to be taken by the Funds' Administrative Manager.

#### V. Data Maintenance/Preventative Measures

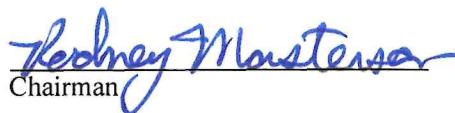
To reduce the likelihood of missing participants, the Fund's Administrative Manager will:

- Periodically remind participants to update contact information;
- Collect multiple forms of contact data (mailing address, email address, phone number, and beneficiary information); and
- Review returned mail and undeliverable electronic communications promptly.

#### VI. Expenses

In accordance with the terms of the Plan, the Funds' may charge a missing Participant's account for any reasonable expenses incurred attempting to locate the individual.

Adopted and effective this 20<sup>th</sup> day of MAY, 2026.

  
Chairman

  
Secretary

# Exhibit 1

<p><b>1. Use Certified Mail</b></p> <p>Send notice via certified mail.</p>	<p><i>Description of Actions Taken/Notes:</i></p>
<p><b>2. Check Related Plan and Employer Records</b></p> <p>Check other records (e.g., employment, other benefit plans) for more current contact information.</p> <p>NOTE: If there are privacy concerns (e.g., under HIPAA), the Fund Administrative Manager may ask that the employer or other plan fiduciary contact or forward a letter for the terminated plan to the missing participant.</p>	<p><i>Attach:</i></p> <p style="text-align: center;">Returned letter and envelope</p>
	<p><i>Date Taken:</i></p>
	<p><i>Actor:</i></p>
	<p><i>Located Participant?      Yes*      No</i></p> <p><i>*If yes, no further attempts to locate required.</i></p>
	<p><i>Description of Actions Taken/Notes:</i></p>
<p><b>2. Check Related Plan and Employer Records</b></p> <p>Check other records (e.g., employment, other benefit plans) for more current contact information.</p> <p>NOTE: If there are privacy concerns (e.g., under HIPAA), the Fund Administrative Manager may ask that the employer or other plan fiduciary contact or forward a letter for the terminated plan to the missing participant.</p>	<p><i>List Other Records Checked:</i></p>
	<p><i>Attach:</i></p> <p style="text-align: center;">Returned letter and envelope</p>
	<p><i>Date Taken:</i></p>
	<p><i>Actor:</i></p>
	<p><i>Located Participant?      Yes*      No</i></p> <p><i>*If yes, no further attempts to locate required.</i></p>

<p><b>3. Check with Designated Plan Beneficiary</b></p> <p>Identify and contact any individual designated as the missing participant's beneficiary to find updated contact information.</p> <p>NOTE: If the beneficiary is concerned about the missing participant's privacy, the Fund Administrative Manager may ask that the beneficiary contact or forward a letter for the terminated plan to the missing participant.</p>	<p><i>Description of Actions Taken/Notes:</i></p>
	<p><i>Attach:</i></p> <p>Beneficiary Designation Form(s), if any Letter sent to designated beneficiary</p>
	<p><i>Date Taken</i></p>
	<p><i>Individual who took action:</i></p>
	<p><i>Located Participant?      Yes*      No</i></p> <p><i>*If yes, no further attempts to locate required.</i></p>
<p><b>4. Use Free Electronic Search Tools</b></p> <p>Online services could include Internet search engines, public record databases (e.g., for licenses, mortgages and real estate taxes), obituaries and social media.</p>	<p><i>Description of Actions Taken/Notes:</i></p>
	<p><i>List Search Tools Used:</i></p>
	<p><i>Attach:</i></p> <p>"Screen Shot" of results pages generated from search tools</p>
	<p><i>Date Taken:</i></p>
	<p><i>Actor:</i></p>
	<p><i>Located Participant?      Yes*      No</i></p> <p><i>*If yes, no further attempts to locate required.</i></p>

**5. Use Paid Electronic Search Tools, Commercial Locator Services, Credit Reporting Agencies, Information Broker, Investigation Databases**

*Description of Actions Taken/Notes:*

*List Additional Tools/Services Used:*

*Attach:*

Information received using additional search tools/services

*Date Taken:*

*Preparer:*

*Located Participant?      Yes\*      No*

*\*If yes, no further attempts to locate required*