

**Notice of Expiration of Certain Deadline Relief and Summary of Material
Modifications
Prepared for Rakuten USA, Inc. Welfare Benefits Plan Participants
Effective May 12, 2023**

This document provides notice of the expiration of the deadline relief that began on March 1, 2020, and an explanation of how that expiration will affect certain deadlines tolled under prior guidance applicable to ERISA plans. This is a Summary of Material Modifications (“Summary”) to the extent those extensions applied to ERISA benefits under the Rakuten USA, Inc. Welfare Benefits Plan (“the Plan”). You should take the time to read this Summary carefully and keep it with the Summary Plan Description (“SPD”) document that was previously provided to you. If you need another copy of the SPD or if you have any questions regarding these changes to the Plan, please contact your benefit advocate at rakutenbenefits@alliant.com.

The end of the National Emergency and Public Health Emergency will impact the expiration of many rules stemming from the COVID-19 federal emergency declarations. The information below summarizes the timing of when important rules will be phased out.

- On April 28, 2020, Multi-Agency guidance extended certain deadlines that apply to group health plans that fall within the COVID-19 outbreak period beginning **March 1, 2020**. Those deadlines included and were limited to the following:
 - The 30-day period to request special enrollment under HIPAA (or 60-day period as applicable to CHIP enrollment requests);
 - employees, spouses, and new dependents are allowed to enroll upon marriage, birth, adoption, or placement for adoption;
 - employees and dependents are allowed to enroll if they had declined coverage due to other health coverage and then lose eligibility or lose all employer contributions towards active coverage;
 - employees and their dependents are allowed to enroll upon loss of coverage under a state Children's Health Insurance Program (CHIP) or Medicaid or who are eligible to receive premium assistance under those programs;
 - The 60-day election period for COBRA continuation coverage;
 - The deadline for making COBRA premium payments;
 - The 60-day deadline for individuals to notify a plan of a COBRA qualifying event or determination of disability;
 - The deadline for individuals to file an ERISA benefit claim under the plan's claims procedure (including a Healthcare FSA run-out period deadline that ends during the outbreak period); or
 - The deadline for claimants to file an appeal of an adverse benefit determination, a request for an external review, and to file information related to a request for external review for an ERISA plan.

The period that these deadlines can be tolled was limited to the earlier of one year from the date an individual was first eligible for relief, or 60 days after the announced end of the National Emergency. Therefore, all deadline tolling ends 60 days after May 11, 2023 or July 10, 2023.

- On March 18, 2020, the Families First Coronavirus Response Act (FFCRA) was signed into law and required all employer-sponsored health plans to provide coverage for testing and other services related to COVID-19 without cost sharing. The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) expanded coverage of COVID-19 testing and effective January 15, 2022, Multi-Agency guidance included OTC COVID-19 tests to be covered by all group health plans without cost sharing.

This requirement was effective for the duration of the Public Health Emergency and will end on May 11, 2023. Below you will find helpful information as it relates to your medical plan.

Aetna EPO, PPO, HDHP Participants:

Coverage for COVID-19 testing/treatment will be subject to the plan's standard cost-sharing effective May 12, 2023. OTC COVID-19 tests will no longer be covered under the plans, although will remain eligible for FSA/HSA reimbursement.

Kaiser California Participants:

California state mandate requires that cost-share waivers for COVID-19 testing continue until the California Public Health Emergency expires, currently anticipated to be November 11, 2023.

Again, if you have any questions regarding these changes to the Plan or your specific circumstances, please contact your benefit advocate at rakutenbenefits@alliant.com.