

BANNER REAL ESTATE GROUP/BPM GIFT MATCHING POLICY

The company recognizes that employees have causes and organizations important to them. As a benefit to employees, the company will match approved employee contributions to charitable organizations based on the following:

Employee Eligibility

The company will match contributions made by any employee who has been employed with the company for a minimum of six months and is not on disciplinary or performance probation.

Eligible Recipients

All organizations are subject to approval by the charitable giving committee.

All levels of schools, public or private, any of which qualify as an exempt organization under internal revenue code section 501(c)(3), provided they don't practice racial or any other discrimination. It is the responsibility of the donor employee to contact the organization to which he or she would like to contribute and get verification of non-profit status prior to making a request for matching.

Any other tax-deductible organizations (internal revenue code, section 501(c)(3), which includes:

- Cultural organizations
- Art museums
- Historical museums
- Science museums, including zoos and botanical gardens
- Libraries
- Public television/radio
- Hospitals
- Social service organizations
- Environmental/conservation groups

Political groups and any organizations involved in lobbying are not eligible.

Donations directly to churches or other religious organizations are not eligible for matching, however, donations to church sponsored activities will be considered on a case by case basis.

To determine whether your gift qualifies for matching, please visit www.charitywatch.org or www.charitynavigator.org.

Contribution Levels

The company will match (dollar for dollar or a 1:1 ratio) contributions up to a maximum of \$500 per employee per calendar year. Due to the administrative expense associated with the matching policy, the minimum contribution to be eligible for a matching contribution is \$20. Contributions of non-cash gifts (such as frequent-flier mile gifts to charity) will not be matched.

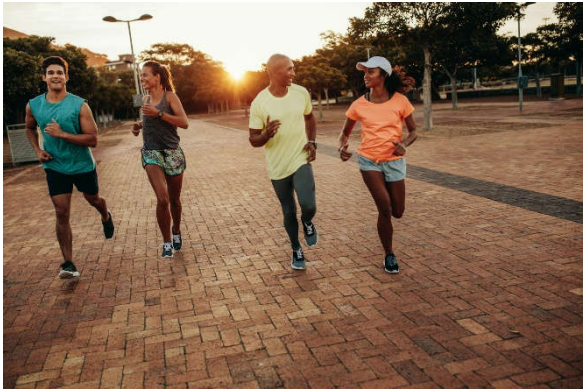


Group Contributions

The intention of this policy is to encourage giving company wide. Properties and groups are encouraged to be creative with their fundraising efforts. Any funds raised for the benefit of an eligible organization (as defined above) which otherwise meets the requirements of this policy, will be considered for matching by the company.

Races, Events Requiring Participation, Etc.

If you are participating in an event that has a fundraising component (for example, a cancer walk, running a race on behalf of a charity, etc.) you may request a contribution from the company. Please note that in order to receive a contribution for this type of event, it does not require a matching contribution on your part. Simply submit the request to BannerGives@bannerreg.com and the committee will evaluate your request for contribution.



Matching Process

Employee writes a check to a non-profit organization and passes it to the charitable contribution committee chair with a matching contribution slip. Employees may also make a certified donation via credit card, provided that evidence of the same is provided at the time of the matching request. A contribution form can be downloaded from the ADP Portal. The completed form should be emailed to BannerGives@bannerreg.com.

Once approved, the charitable contribution committee will request a check from the accounting department to be sent to the nonprofit organization along with the employee's check, or, if the employee made the donation via credit card, accounting will forward the match.

If the accounting department is sending two checks, the accounting department will request two receipts — one made out to the company and one made out to the employee.



Approval Process

Matching will be done on a quarterly basis. If the program is over-subscribed, matching will be done according to the charitable contribution committee's discretion. If the program is under-subscribed at the end of the calendar year, the charitable contribution committee will select a charity (or charities) to which it will direct any remaining funds or rollover remaining match funds to the following year. The schedule of matches is set forth below:

Forms Received by:	Matching Gifts Paid by:
March 1	March 31
June 1	June 30
September 1	September 30
December 1	December 30

Note that gifts must be submitted for matching within 180 days of the date of the gift. This policy applies to gifts made starting January 1, 2018.

If a donation is time sensitive, please email BannerGives@bannerreg.com with a copy to Jennifer Nichols at jnichols@bannerreg.com and the committee will address your request as soon as possible.

Dollars for Doers

In lieu of monetary contributions, any employee who donates 20 volunteer hours or more to any eligible organization (as defined above) shall be eligible for a one-time (annual) \$250 donation to that organization. The certification form for Dollars for Doers will be posted on the ADP Portal and should be submitted via email to BannerGives@bannerreg.com.