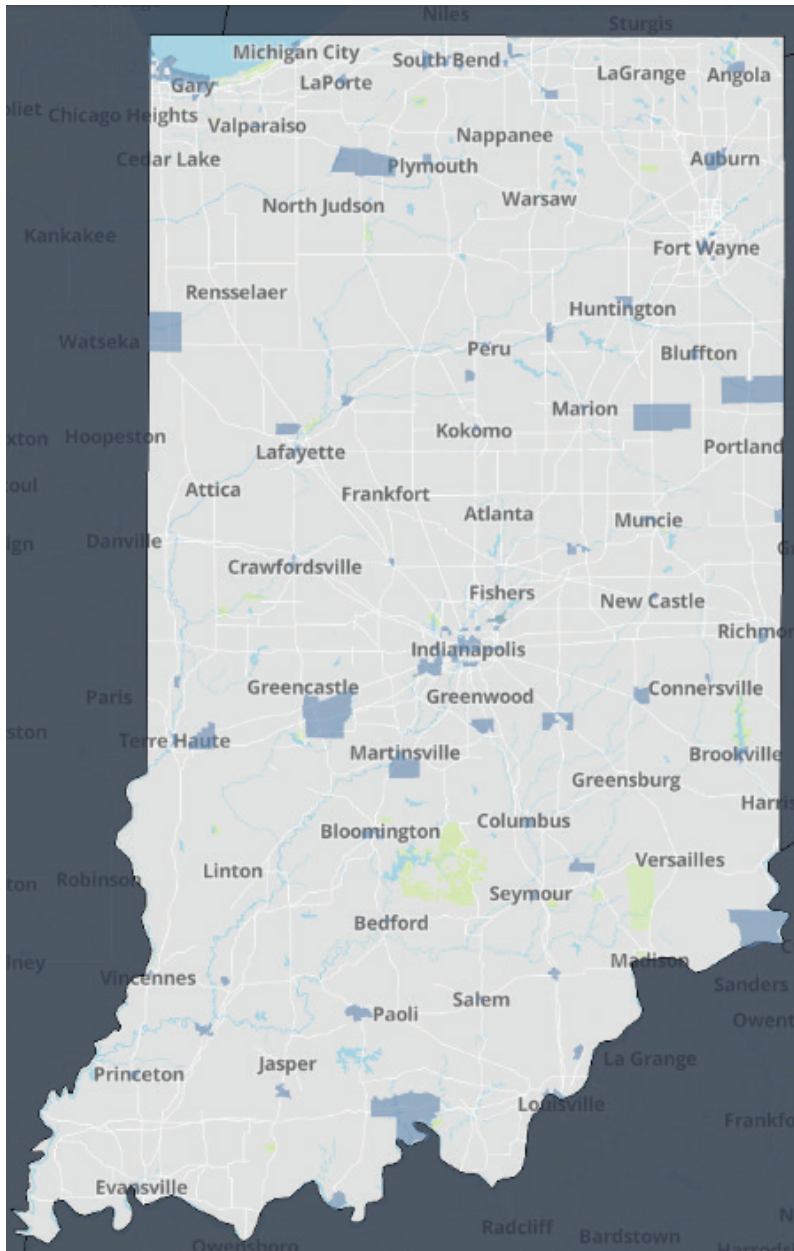
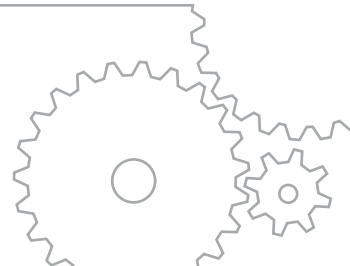
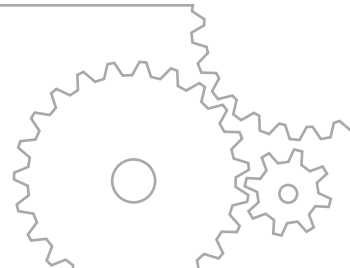






INDIANA'S OPPORTUNITY ZONES

The Opportunity Zone program, established by the Tax Cuts and Jobs Act of 2017, allowed governors to designate up to 25% of a state's low-income census tracts as areas for certain tax advantages on investments.

Indiana's Governor Eric Holcomb nominated 156 zones, which were approved by the U.S. Department of the Treasury.

The census tracts were selected based on a combination of factors, including existing economic development programs and local coordination efforts, economic and community data, likelihood of attracting short- and long-term investment, growing industry sectors within the community, and information submitted through the online application.

The Governor received nearly 2,000 recommendations, including input from 357 local officials, stakeholders, and citizens.

An advisory committee, made up of five geographic and industry-diverse individuals, was created to submit the final recommendations to Governor Holcomb.

The Opportunity Zone program provides a tax incentive for investors to re-invest their unrealized capital gains into Opportunity Funds. Tax reform has mechanics for investment holdings and capital gains provisions that went into effect upon passage, so investors can begin participating immediately.

An Opportunity Fund is a private sector investment vehicle that invests at least 90% of its capital in Opportunity Zones. Some funds can be created for a specific project while others may hold a range of investments.

In October, the U.S. Department of the Treasury released initial guidance for investors interested in Opportunity Zones. The guidance provides clarity on several items related to Opportunity Zones including who is eligible to participate, the timing of transactions necessary for satisfying the requirements of the statute, certain rules related to the creation of an Opportunity Fund, and how to ensure the fund remains qualified for the tax incentives provided through the program. The full regulations can be found at www.irs.gov/pub/irs-drop/reg-115420-18.pdf.

Indiana is well positioned for investment through the Opportunity Zone program because of the state's pro-growth business environment, competitive tax climate, efficient regulatory system, AAA credit rating, and a consistently balanced state budget.

Investors receive tax benefits that may enhance their overall return, while positively impacting Indiana communities within Opportunity Zones.