

Form 5500 Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Annual Return/Report of Employee Benefit Plan This form is required to be filed for employee benefit plans under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and sections 6057(b) and 6058(a) of the Internal Revenue Code (the Code). ▶ Complete all entries in accordance with the instructions to the Form 5500.	OMB Nos. 1210-0110 1210-0089 2021 This Form is Open to Public Inspection
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Part I	Annual Report Identification Information
For calendar plan year 2021 or fiscal plan year beginning <u>01/01/2021</u> and ending <u>12/31/2021</u>	
A This return/report is for:	☐ a multiemployer plan ☐ a multiple-employer plan (Filers checking this box must attach a list of participating employer information in accordance with the form instructions.) ☒ a single-employer plan ☐ a DFE (specify) _____
B This return/report is:	☐ the first return/report ☐ the final return/report ☐ an amended return/report ☐ a short plan year return/report (less than 12 months)
C If the plan is a collectively-bargained plan, check here.	☐
D Check box if filing under:	☒ Form 5558 ☐ automatic extension ☐ the DFVC program ☐ special extension (enter description)
E If this is a retroactively adopted plan permitted by SECURE Act section 201, check here.	☐

Part II	Basic Plan Information—enter all requested information				
1a Name of plan <u>THE MILLER GROUP 401(K) PLAN</u>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">1b Three-digit plan number (PN) ▶</td> <td style="width: 20%; text-align: center;"><u>001</u></td> </tr> <tr> <td colspan="2">1c Effective date of plan <u>01/01/2008</u></td> </tr> </table>	1b Three-digit plan number (PN) ▶	<u>001</u>	1c Effective date of plan <u>01/01/2008</u>	
1b Three-digit plan number (PN) ▶	<u>001</u>				
1c Effective date of plan <u>01/01/2008</u>					
2a Plan sponsor's name (employer, if for a single-employer plan) Mailing address (include room, apt., suite no. and street, or P.O. Box) City or town, state or province, country, and ZIP or foreign postal code (if foreign, see instructions) <u>CKM INDUSTRIES, INC.</u> <u>629 HOWARD DRIVE</u> <u>DEER PARK, TX 77536</u>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>2b Employer Identification Number (EIN) <u>74-2376364</u></td> </tr> <tr> <td>2c Plan Sponsor's telephone number <u>281-842-1538</u></td> </tr> <tr> <td>2d Business code (see instructions) <u>238900</u></td> </tr> </table>	2b Employer Identification Number (EIN) <u>74-2376364</u>	2c Plan Sponsor's telephone number <u>281-842-1538</u>	2d Business code (see instructions) <u>238900</u>	
2b Employer Identification Number (EIN) <u>74-2376364</u>					
2c Plan Sponsor's telephone number <u>281-842-1538</u>					
2d Business code (see instructions) <u>238900</u>					

Caution: A penalty for the late or incomplete filing of this return/report will be assessed unless reasonable cause is established.

Under penalties of perjury and other penalties set forth in the instructions, I declare that I have examined this return/report, including accompanying schedules, statements and attachments, as well as the electronic version of this return/report, and to the best of my knowledge and belief, it is true, correct, and complete.

SIGN HERE	Filed with authorized/valid electronic signature.	10/18/2022	TIMOTHY BURKE
	Signature of plan administrator	Date	Enter name of individual signing as plan administrator
SIGN HERE			
	Signature of employer/plan sponsor	Date	Enter name of individual signing as employer or plan sponsor
SIGN HERE			
	Signature of DFE	Date	Enter name of individual signing as DFE

For Paperwork Reduction Act Notice, see the Instructions for Form 5500.

Form 5500 (2021)
v. 210624

3a Plan administrator's name and address ☒ Same as Plan Sponsor		3b Administrator's EIN	
		3c Administrator's telephone number	
4 If the name and/or EIN of the plan sponsor or the plan name has changed since the last return/report filed for this plan, enter the plan sponsor's name, EIN, the plan name and the plan number from the last return/report: a Sponsor's name c Plan Name		4b EIN 4d PN	
5 Total number of participants at the beginning of the plan year		5	486
6 Number of participants as of the end of the plan year unless otherwise stated (welfare plans complete only lines 6a(1) , 6a(2) , 6b , 6c , and 6d).			
a(1) Total number of active participants at the beginning of the plan year.....		6a(1)	395
a(2) Total number of active participants at the end of the plan year		6a(2)	317
b Retired or separated participants receiving benefits.....		6b	1
c Other retired or separated participants entitled to future benefits		6c	103
d Subtotal. Add lines 6a(2) , 6b , and 6c		6d	421
e Deceased participants whose beneficiaries are receiving or are entitled to receive benefits.		6e	0
f Total. Add lines 6d and 6e		6f	421
g Number of participants with account balances as of the end of the plan year (only defined contribution plans complete this item)		6g	193
h Number of participants who terminated employment during the plan year with accrued benefits that were less than 100% vested		6h	4
7 Enter the total number of employers obligated to contribute to the plan (only multiemployer plans complete this item).....		7	
8a If the plan provides pension benefits, enter the applicable pension feature codes from the List of Plan Characteristics Codes in the instructions: 2E 2J 2K 2F 2G 3D 3H			
b If the plan provides welfare benefits, enter the applicable welfare feature codes from the List of Plan Characteristics Codes in the instructions:			
9a Plan funding arrangement (check all that apply) (1) ☒ Insurance (2) ☐ Code section 412(e)(3) insurance contracts (3) ☒ Trust (4) ☐ General assets of the sponsor		9b Plan benefit arrangement (check all that apply) (1) ☒ Insurance (2) ☐ Code section 412(e)(3) insurance contracts (3) ☒ Trust (4) ☐ General assets of the sponsor	
10 Check all applicable boxes in 10a and 10b to indicate which schedules are attached, and, where indicated, enter the number attached. (See instructions)			
a Pension Schedules (1) ☒ R (Retirement Plan Information) (2) ☐ MB (Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information) - signed by the plan actuary (3) ☐ SB (Single-Employer Defined Benefit Plan Actuarial Information) - signed by the plan actuary		b General Schedules (1) ☒ H (Financial Information) (2) ☐ I (Financial Information – Small Plan) (3) ☒ <u>1</u> A (Insurance Information) (4) ☒ C (Service Provider Information) (5) ☒ D (DFE/Participating Plan Information) (6) ☐ G (Financial Transaction Schedules)	

Part III Form M-1 Compliance Information (to be completed by welfare benefit plans)

11a If the plan provides welfare benefits, was the plan subject to the Form M-1 filing requirements during the plan year? (See instructions and 29 CFR 2520.101-2.) ☐ Yes ☐ No

If "Yes" is checked, complete lines 11b and 11c.

11b Is the plan currently in compliance with the Form M-1 filing requirements? (See instructions and 29 CFR 2520.101-2.) ☐ Yes ☐ No

11c Enter the Receipt Confirmation Code for the 2021 Form M-1 annual report. If the plan was not required to file the 2021 Form M-1 annual report, enter the Receipt Confirmation Code for the most recent Form M-1 that was required to be filed under the Form M-1 filing requirements. (Failure to enter a valid Receipt Confirmation Code will subject the Form 5500 filing to rejection as incomplete.)

Receipt Confirmation Code _____

SCHEDULE A (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Insurance Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA). ▶ File as an attachment to Form 5500. ▶ Insurance companies are required to provide the information pursuant to ERISA section 103(a)(2).	OMB No. 1210-0110 2021 This Form is Open to Public Inspection
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For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021	
A Name of plan THE MILLER GROUP 401(K) PLAN	B Three-digit plan number (PN) ▶ 001
C Plan sponsor's name as shown on line 2a of Form 5500 CKM INDUSTRIES, INC.	D Employer Identification Number (EIN) 74-2376364

Part I	Information Concerning Insurance Contract Coverage, Fees, and Commissions	Provide information for each contract on a separate Schedule A. Individual contracts grouped as a unit in Parts II and III can be reported on a single Schedule A.
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1 Coverage Information:

(a) Name of insurance carrier
VOYA RETIREMENT INSURANCE AND ANNUITY COMPANY

(b) EIN	(c) NAIC code	(d) Contract or identification number	(e) Approximate number of persons covered at end of policy or contract year	Policy or contract year	
				(f) From	(g) To
71-0294708	86509	81D798	199	01/01/2021	12/31/2021

2 Insurance fee and commission information. Enter the total fees and total commissions paid. List in line 3 the agents, brokers, and other persons in descending order of the amount paid.

(a) Total amount of commissions paid	(b) Total amount of fees paid

3 Persons receiving commissions and fees. (Complete as many entries as needed to report all persons).

(a) Name and address of the agent, broker, or other person to whom commissions or fees were paid

(b) Amount of sales and base commissions paid	Fees and other commissions paid		(e) Organization code
	(c) Amount	(d) Purpose	

(a) Name and address of the agent, broker, or other person to whom commissions or fees were paid

(b) Amount of sales and base commissions paid	Fees and other commissions paid		(e) Organization code
	(c) Amount	(d) Purpose	

(a) Name and address of the agent, broker, or other person to whom commissions or fees were paid

(b) Amount of sales and base commissions paid	Fees and other commissions paid		(e) Organization code
	(c) Amount	(d) Purpose	

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(b) Amount of sales and base commissions paid	Fees and other commissions paid		(e) Organization code
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(b) Amount of sales and base commissions paid	Fees and other commissions paid		(e) Organization code
	(c) Amount	(d) Purpose	

(a) Name and address of the agent, broker, or other person to whom commissions or fees were paid

(b) Amount of sales and base commissions paid	Fees and other commissions paid		(e) Organization code
	(c) Amount	(d) Purpose	

Part II Investment and Annuity Contract Information

Where individual contracts are provided, the entire group of such individual contracts with each carrier may be treated as a unit for purposes of this report.

4	Current value of plan's interest under this contract in the general account at year end	4	902449
5	Current value of plan's interest under this contract in separate accounts at year end.....	5	0

6 Contracts With Allocated Funds:**a** State the basis of premium rates ▶

b	Premiums paid to carrier	6b	
c	Premiums due but unpaid at the end of the year	6c	
d	If the carrier, service, or other organization incurred any specific costs in connection with the acquisition or retention of the contract or policy, enter amount. Specify nature of costs ▶	6d	

e Type of contract: (1) ☐ individual policies (2) ☐ group deferred annuity
(3) ☐ other (specify) ▶

f If contract purchased, in whole or in part, to distribute benefits from a terminating plan, check here ▶ ☐**7 Contracts With Unallocated Funds (Do not include portions of these contracts maintained in separate accounts)**

a Type of contract: (1) ☐ deposit administration (2) ☐ immediate participation guarantee
(3) ☐ guaranteed investment (4) ☒ other ▶ **GROUP PENSION FUNDING**

b	Balance at the end of the previous year	7b	928833
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c	Additions: (1) Contributions deposited during the year	7c(1)	91568	
	(2) Dividends and credits.....	7c(2)	0	
	(3) Interest credited during the year.....	7c(3)	9379	
	(4) Transferred from separate account.....	7c(4)	86402	
	(5) Other (specify below)	7c(5)	6349	

▶ **LOAN REPAYMENT, POSITIVE VALUE ADJUSTMENTS**

(6) Total additions	7c(6)	193698
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d	Total of balance and additions (add lines 7b and 7c(6))	7d	1122531
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e	Deductions:			
	(1) Disbursed from fund to pay benefits or purchase annuities during year	7e(1)	214571	
	(2) Administration charge made by carrier.....	7e(2)	5512	
	(3) Transferred to separate account.....	7e(3)		
	(4) Other (specify below)	7e(4)		

(5) Total deductions	7e(5)	220083
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f	Balance at the end of the current year (subtract line 7e(5) from line 7d)	7f	902448
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Part III Welfare Benefit Contract Information

If more than one contract covers the same group of employees of the same employer(s) or members of the same employee organizations(s), the information may be combined for reporting purposes if such contracts are experience-rated as a unit. Where contracts cover individual employees, the entire group of such individual contracts with each carrier may be treated as a unit for purposes of this report.

8 Benefit and contract type (check all applicable boxes)

- a** ☐ Health (other than dental or vision)
b ☐ Dental
c ☐ Vision
d ☐ Life insurance
e ☐ Temporary disability (accident and sickness)
f ☐ Long-term disability
g ☐ Supplemental unemployment
h ☐ Prescription drug
i ☐ Stop loss (large deductible)
j ☐ HMO contract
k ☐ PPO contract
l ☐ Indemnity contract
m ☐ Other (specify) ▶

9 Experience-rated contracts:

a Premiums: (1) Amount received	9a(1)		
(2) Increase (decrease) in amount due but unpaid	9a(2)		
(3) Increase (decrease) in unearned premium reserve	9a(3)		
(4) Earned ((1) + (2) - (3))		9a(4)	0
b Benefit charges (1) Claims paid	9b(1)		
(2) Increase (decrease) in claim reserves	9b(2)		
(3) Incurred claims (add (1) and (2))		9b(3)	0
(4) Claims charged		9b(4)	
c Remainder of premium: (1) Retention charges (on an accrual basis) --			
(A) Commissions	9c(1)(A)		
(B) Administrative service or other fees	9c(1)(B)		
(C) Other specific acquisition costs	9c(1)(C)		
(D) Other expenses	9c(1)(D)		
(E) Taxes	9c(1)(E)		
(F) Charges for risks or other contingencies	9c(1)(F)		
(G) Other retention charges	9c(1)(G)		
(H) Total retention		9c(1)(H)	0
(2) Dividends or retroactive rate refunds. (These amounts were ☐ paid in cash, or ☐ credited.)		9c(2)	
d Status of policyholder reserves at end of year: (1) Amount held to provide benefits after retirement		9d(1)	
(2) Claim reserves		9d(2)	
(3) Other reserves		9d(3)	
e Dividends or retroactive rate refunds due. (Do not include amount entered in line 9c(2).)		9e	

10 Nonexperience-rated contracts:

a Total premiums or subscription charges paid to carrier	10a	
b If the carrier, service, or other organization incurred any specific costs in connection with the acquisition or retention of the contract or policy, other than reported in Part I, line 2 above, report amount. Specify nature of costs.	10b	

Part IV Provision of Information

11 Did the insurance company fail to provide any information necessary to complete Schedule A? ☐ Yes ☒ No

12 If the answer to line 11 is "Yes," specify the information not provided. ▶

SCHEDULE C (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Service Provider Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA). ▶ File as an attachment to Form 5500.	OMB No. 1210-0110
		2021
		This Form is Open to Public Inspection.
For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021		
A Name of plan THE MILLER GROUP 401(K) PLAN	B Three-digit plan number (PN) ▶	001
C Plan sponsor's name as shown on line 2a of Form 5500 CKM INDUSTRIES, INC.	D Employer Identification Number (EIN) 74-2376364	

Part I	Service Provider Information (see instructions)
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You must complete this Part, in accordance with the instructions, to report the information required for **each person** who received, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of monetary value) in connection with services rendered to the plan or the person's position with the plan during the plan year. If a person received **only** eligible indirect compensation for which the plan received the required disclosures, you are required to answer line 1 but are not required to include that person when completing the remainder of this Part.

1 Information on Persons Receiving Only Eligible Indirect Compensation

- a** Check "Yes" or "No" to indicate whether you are excluding a person from the remainder of this Part because they received only eligible indirect compensation for which the plan received the required disclosures (see instructions for definitions and conditions)..... ☒ Yes ☐ No
- b** If you answered line 1a "Yes," enter the name and EIN or address of each person providing the required disclosures for the service providers who received only eligible indirect compensation. Complete as many entries as needed (see instructions).

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation
VOYA RETIREMENT INSURANCE AND ANNUITY COMPANY PO BOX 990067 HARTFORD, CT 06199-0067 71-0294708
(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation
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2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

DAVIDSON CAPITAL MANAGEMENT

75-2301796

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
99	SERVICE PROVIDER	0	Yes ☒ No ☐	Yes ☐ No ☒	21532	Yes ☐ No ☒

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

Part I Service Provider Information (continued)

3. If you reported on line 2 receipt of indirect compensation, other than eligible indirect compensation, by a service provider, and the service provider is a fiduciary or provides contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services, answer the following questions for (a) each source from whom the service provider received \$1,000 or more in indirect compensation and (b) each source for whom the service provider gave you a formula used to determine the indirect compensation instead of an amount or estimated amount of the indirect compensation. Complete as many entries as needed to report the required information for each source.

(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
DAVIDSON CAPITAL MANAGEMENT	99	21532
(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	
VOYA RETIREMENT INSURANCE AND ANNUITY CO HARTFORD, CT 06199-0067 71-0294708	OTHER FEES	
(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	
(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	

Part II Service Providers Who Fail or Refuse to Provide Information

4 Provide, to the extent possible, the following information for each service provider who failed or refused to provide the information necessary to complete this Schedule.

(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide
(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide
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(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide
(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide

Part III Termination Information on Accountants and Enrolled Actuaries (see instructions)
(complete as many entries as needed)

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

SCHEDULE D (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration		DFE/Participating Plan Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA). ▶ File as an attachment to Form 5500.		OMB No. 1210-0110 2021 This Form is Open to Public Inspection.	
For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021					
A Name of plan THE MILLER GROUP 401(K) PLAN				B Three-digit plan number (PN) ▶ 001	
C Plan or DFE sponsor's name as shown on line 2a of Form 5500 CKM INDUSTRIES, INC.				D Employer Identification Number (EIN) 74-2376364	
Part I Information on interests in MTIAs, CCTs, PSAs, and 103-12 IEs (to be completed by plans and DFEs) (Complete as many entries as needed to report all interests in DFEs)					
a Name of MTIA, CCT, PSA, or 103-12 IE: MAP SELECT					
b Name of sponsor of entity listed in (a): VOYA RETIREMENT INSURANCE AND ANNUITY SEPARATE ACCOUNT D					
c EIN-PN 71-0294708-001		d Entity code P		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions) 5652612	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)	
a Name of MTIA, CCT, PSA, or 103-12 IE:					
b Name of sponsor of entity listed in (a):					
c EIN-PN		d Entity code		e Dollar value of interest in MTIA, CCT, PSA, or 1	

a Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
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103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
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103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)

Part II Information on Participating Plans (to be completed by DFEs)

(Complete as many entries as needed to report all participating plans)

a Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN

SCHEDULE H (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Financial Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA), and section 6058(a) of the Internal Revenue Code (the Code). ► File as an attachment to Form 5500.	OMB No. 1210-0110 2021 This Form is Open to Public Inspection
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For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021		
A Name of plan THE MILLER GROUP 401(K) PLAN	B Three-digit plan number (PN) ►	001
C Plan sponsor's name as shown on line 2a of Form 5500 CKM INDUSTRIES, INC.	D Employer Identification Number (EIN) 74-2376364	

Part I	Asset and Liability Statement
---------------	--------------------------------------

1 Current value of plan assets and liabilities at the beginning and end of the plan year. Combine the value of plan assets held in more than one trust. Report the value of the plan's interest in a commingled fund containing the assets of more than one plan on a line-by-line basis unless the value is reportable on lines 1c(9) through 1c(14). Do not enter the value of that portion of an insurance contract which guarantees, during this plan year, to pay a specific dollar benefit at a future date. **Round off amounts to the nearest dollar.** MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 1b(1), 1b(2), 1c(8), 1g, 1h, and 1i. CCTs, PSAs, and 103-12 IEs also do not complete lines 1d and 1e. See instructions.

Assets		(a) Beginning of Year	(b) End of Year
a Total noninterest-bearing cash.....	1a		
b Receivables (less allowance for doubtful accounts):			
(1) Employer contributions	1b(1)	6629	8351
(2) Participant contributions.....	1b(2)	15339	24653
(3) Other	1b(3)		
c General investments:			
(1) Interest-bearing cash (include money market accounts & certificates of deposit)	1c(1)		
(2) U.S. Government securities	1c(2)		
(3) Corporate debt instruments (other than employer securities):			
(A) Preferred	1c(3)(A)		
(B) All other	1c(3)(B)		
(4) Corporate stocks (other than employer securities):			
(A) Preferred	1c(4)(A)		
(B) Common	1c(4)(B)		
(5) Partnership/joint venture interests	1c(5)		
(6) Real estate (other than employer real property)	1c(6)		
(7) Loans (other than to participants)	1c(7)		
(8) Participant loans	1c(8)	96225	56164
(9) Value of interest in common/collective trusts.....	1c(9)		
(10) Value of interest in pooled separate accounts	1c(10)		
(11) Value of interest in master trust investment accounts.....	1c(11)		
(12) Value of interest in 103-12 investment entities	1c(12)		
(13) Value of interest in registered investment companies (e.g., mutual funds)	1c(13)	5935515	5652612
(14) Value of funds held in insurance company general account (unallocated contracts).....	1c(14)	928834	902449
(15) Other.....	1c(15)		

		(a) Beginning of Year	(b) End of Year
1d	Employer-related investments:		
(1)	Employer securities.....	1d(1)	
(2)	Employer real property.....	1d(2)	
e	Buildings and other property used in plan operation	1e	
f	Total assets (add all amounts in lines 1a through 1e)	1f	6982542 6644229
Liabilities			
g	Benefit claims payable	1g	0 0
h	Operating payables	1h	
i	Acquisition indebtedness.....	1i	
j	Other liabilities.....	1j	
k	Total liabilities (add all amounts in lines 1g through 1j)	1k	0 0
Net Assets			
l	Net assets (subtract line 1k from line 1f)	1l	6982542 6644229

Part II Income and Expense Statement

2 Plan income, expenses, and changes in net assets for the year. Include all income and expenses of the plan, including any trust(s) or separately maintained fund(s) and any payments/receipts to/from insurance carriers. Round off amounts to the nearest dollar. MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 2a, 2b(1)(E), 2e, 2f, and 2g.

		(a) Amount	(b) Total
Income			
a	Contributions:		
(1)	Received or receivable in cash from: (A) Employers	2a(1)(A)	255269
	(B) Participants	2a(1)(B)	569602
	(C) Others (including rollovers).....	2a(1)(C)	28423
(2)	Noncash contributions.....	2a(2)	
(3)	Total contributions. Add lines 2a(1)(A) , (B) , (C) , and line 2a(2)	2a(3)	853294
b	Earnings on investments:		
(1)	Interest:		
	(A) Interest-bearing cash (including money market accounts and certificates of deposit).....	2b(1)(A)	
	(B) U.S. Government securities	2b(1)(B)	
	(C) Corporate debt instruments	2b(1)(C)	
	(D) Loans (other than to participants)	2b(1)(D)	
	(E) Participant loans.....	2b(1)(E)	4621
	(F) Other	2b(1)(F)	
	(G) Total interest. Add lines 2b(1)(A) through (F)	2b(1)(G)	4621
(2)	Dividends: (A) Preferred stock.....	2b(2)(A)	
	(B) Common stock	2b(2)(B)	
	(C) Registered investment company shares (e.g. mutual funds).....	2b(2)(C)	
	(D) Total dividends. Add lines 2b(2)(A) , (B) , and (C)	2b(2)(D)	0
(3)	Rents	2b(3)	
(4)	Net gain (loss) on sale of assets: (A) Aggregate proceeds	2b(4)(A)	
	(B) Aggregate carrying amount (see instructions).....	2b(4)(B)	
	(C) Subtract line 2b(4)(B) from line 2b(4)(A) and enter result	2b(4)(C)	0
(5)	Unrealized appreciation (depreciation) of assets: (A) Real estate	2b(5)(A)	
	(B) Other	2b(5)(B)	
	(C) Total unrealized appreciation of assets. Add lines 2b(5)(A) and (B)	2b(5)(C)	0

		(a) Amount	(b) Total
(6) Net investment gain (loss) from common/collective trusts.....	2b(6)		
(7) Net investment gain (loss) from pooled separate accounts.....	2b(7)		792906
(8) Net investment gain (loss) from master trust investment accounts.....	2b(8)		
(9) Net investment gain (loss) from 103-12 investment entities.....	2b(9)		
(10) Net investment gain (loss) from registered investment companies (e.g., mutual funds).....	2b(10)		
c Other income.....	2c		
d Total income. Add all income amounts in column (b) and enter total.....	2d		1650821
Expenses			
e Benefit payment and payments to provide benefits:			
(1) Directly to participants or beneficiaries, including direct rollovers.....	2e(1)	1945092	
(2) To insurance carriers for the provision of benefits.....	2e(2)		
(3) Other.....	2e(3)		
(4) Total benefit payments. Add lines 2e(1) through (3).....	2e(4)		1945092
f Corrective distributions (see instructions).....	2f		
g Certain deemed distributions of participant loans (see instructions).....	2g		
h Interest expense.....	2h		
i Administrative expenses: (1) Professional fees.....	2i(1)		
(2) Contract administrator fees.....	2i(2)	44042	
(3) Investment advisory and management fees.....	2i(3)		
(4) Other.....	2i(4)		
(5) Total administrative expenses. Add lines 2i(1) through (4).....	2i(5)		44042
j Total expenses. Add all expense amounts in column (b) and enter total.....	2j		1989134
Net Income and Reconciliation			
k Net income (loss). Subtract line 2j from line 2d.....	2k		-338313
l Transfers of assets:			
(1) To this plan.....	2l(1)		
(2) From this plan.....	2l(2)		

Part III Accountant's Opinion

3 Complete lines 3a through 3c if the opinion of an independent qualified public accountant is attached to this Form 5500. Complete line 3d if an opinion is not attached.

a The attached opinion of an independent qualified public accountant for this plan is (see instructions):

(1) ☒ Unmodified (2) ☐ Qualified (3) ☐ Disclaimer (4) ☐ Adverse

b Check the appropriate box(es) to indicate whether the IQPA performed an ERISA section 103(a)(3)(C) audit. Check both boxes (1) and (2) if the audit was performed pursuant to both 29 CFR 2520.103-8 and 29 CFR 2520.103-12(d). Check box (3) if pursuant to neither.

(1) ☒ DOL Regulation 2520.103-8 (2) ☐ DOL Regulation 2520.103-12(d) (3) ☐ neither DOL Regulation 2520.103-8 nor DOL Regulation 2520.103-12(d).

c Enter the name and EIN of the accountant (or accounting firm) below:

(1) Name: BDO USA, LLP

(2) EIN: 13-5381590

d The opinion of an independent qualified public accountant is **not attached** because:

(1) ☐ This form is filed for a CCT, PSA, or MTIA. (2) ☐ It will be attached to the next Form 5500 pursuant to 29 CFR 2520.104-50.

Part IV Compliance Questions

4 CCTs and PSAs do not complete Part IV. MTIAs, 103-12 IEs, and GIAs do not complete lines 4a, 4e, 4f, 4g, 4h, 4k, 4m, 4n, or 5. 103-12 IEs also do not complete lines 4j and 4l. MTIAs also do not complete line 4l.

During the plan year:

a Was there a failure to transmit to the plan any participant contributions within the time period described in 29 CFR 2510.3-102? Continue to answer "Yes" for any prior year failures until fully corrected. (See instructions and DOL's Voluntary Fiduciary Correction Program.).....

	Yes	No	Amount
4a		X	

	Yes	No	Amount
b Were any loans by the plan or fixed income obligations due the plan in default as of the close of the plan year or classified during the year as uncollectible? Disregard participant loans secured by participant's account balance. (Attach Schedule G (Form 5500) Part I if "Yes" is checked.)			
4b		X	
c Were any leases to which the plan was a party in default or classified during the year as uncollectible? (Attach Schedule G (Form 5500) Part II if "Yes" is checked.)			
4c		X	
d Were there any nonexempt transactions with any party-in-interest? (Do not include transactions reported on line 4a. Attach Schedule G (Form 5500) Part III if "Yes" is checked.)			
4d		X	
e Was this plan covered by a fidelity bond?	X		500000
f Did the plan have a loss, whether or not reimbursed by the plan's fidelity bond, that was caused by fraud or dishonesty?		X	
4f		X	
g Did the plan hold any assets whose current value was neither readily determinable on an established market nor set by an independent third party appraiser?			
4g		X	
h Did the plan receive any noncash contributions whose value was neither readily determinable on an established market nor set by an independent third party appraiser?			
4h		X	
i Did the plan have assets held for investment? (Attach schedule(s) of assets if "Yes" is checked, and see instructions for format requirements.)	X		
4i	X		
j Were any plan transactions or series of transactions in excess of 5% of the current value of plan assets? (Attach schedule of transactions if "Yes" is checked and see instructions for format requirements.)			
4j		X	
k Were all the plan assets either distributed to participants or beneficiaries, transferred to another plan, or brought under the control of the PBGC?			
4k		X	
l Has the plan failed to provide any benefit when due under the plan?			
4l		X	
m If this is an individual account plan, was there a blackout period? (See instructions and 29 CFR 2520.101-3.)			
4m		X	
n If 4m was answered "Yes," check the "Yes" box if you either provided the required notice or one of the exceptions to providing the notice applied under 29 CFR 2520.101-3.			
4n			

5a Has a resolution to terminate the plan been adopted during the plan year or any prior plan year? ☐ Yes ☒ No
If "Yes," enter the amount of any plan assets that reverted to the employer this year _____.

5b If, during this plan year, any assets or liabilities were transferred from this plan to another plan(s), identify the plan(s) to which assets or liabilities were transferred. (See instructions.)

5b(1) Name of plan(s)	5b(2) EIN(s)	5b(3) PN(s)

5c Was the plan a defined benefit plan covered under the PBGC insurance program at any time during this plan year? (See ERISA section 4021 and instructions.) ☐ Yes ☐ No ☐ Not determined
If "Yes" is checked, enter the My PAA confirmation number from the PBGC premium filing for this plan year _____.

SCHEDULE R (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Retirement Plan Information This schedule is required to be filed under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and section 6058(a) of the Internal Revenue Code (the Code). ▶ File as an attachment to Form 5500.	OMB No. 1210-0110 2021 This Form is Open to Public Inspection.
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For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021

A Name of plan <u>THE MILLER GROUP 401(K) PLAN</u>	B Three-digit plan number (PN) ▶ <u>001</u>
C Plan sponsor's name as shown on line 2a of Form 5500 <u>CKM INDUSTRIES, INC.</u>	D Employer Identification Number (EIN) <u>74-2376364</u>

Part I	Distributions
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All references to distributions relate only to payments of benefits during the plan year.

1 Total value of distributions paid in property other than in cash or the forms of property specified in the instructions.....	1	<u>0</u>
2 Enter the EIN(s) of payor(s) who paid benefits on behalf of the plan to participants or beneficiaries during the year (if more than two, enter EINs of the two payors who paid the greatest dollar amounts of benefits): EIN(s): <u>71-0294708</u>		
Profit-sharing plans, ESOPs, and stock bonus plans, skip line 3.		
3 Number of participants (living or deceased) whose benefits were distributed in a single sum, during the plan year	3	

Part II	Funding Information (If the plan is not subject to the minimum funding requirements of section 412 of the Internal Revenue Code or ERISA section 302, skip this Part.)
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4 Is the plan administrator making an election under Code section 412(d)(2) or ERISA section 302(d)(2)?	☐ Yes	☐ No	☐ N/A
If the plan is a defined benefit plan, go to line 8.			
5 If a waiver of the minimum funding standard for a prior year is being amortized in this plan year, see instructions and enter the date of the ruling letter granting the waiver. Date: Month _____ Day _____ Year _____ If you completed line 5, complete lines 3, 9, and 10 of Schedule MB and do not complete the remainder of this schedule.			
6 a Enter the minimum required contribution for this plan year (include any prior year accumulated funding deficiency not waived)	6a		
b Enter the amount contributed by the employer to the plan for this plan year	6b		
c Subtract the amount in line 6b from the amount in line 6a. Enter the result (enter a minus sign to the left of a negative amount)	6c		
If you completed line 6c, skip lines 8 and 9.			
7 Will the minimum funding amount reported on line 6c be met by the funding deadline?	☐ Yes	☐ No	☐ N/A
8 If a change in actuarial cost method was made for this plan year pursuant to a revenue procedure or other authority providing automatic approval for the change or a class ruling letter, does the plan sponsor or plan administrator agree with the change?	☐ Yes	☐ No	☐ N/A

Part III	Amendments
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9 If this is a defined benefit pension plan, were any amendments adopted during this plan year that increased or decreased the value of benefits? If yes, check the appropriate box. If no, check the "No" box.....	☐ Increase	☐ Decrease	☐ Both	☐ No
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Part IV	ESOPs (see instructions). If this is not a plan described under section 409(a) or 4975(e)(7) of the Internal Revenue Code, skip this Part.
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10 Were unallocated employer securities or proceeds from the sale of unallocated securities used to repay any exempt loan?	☐ Yes	☐ No
11 a Does the ESOP hold any preferred stock?	☐ Yes	☐ No
b If the ESOP has an outstanding exempt loan with the employer as lender, is such loan part of a "back-to-back" loan? (See instructions for definition of "back-to-back" loan.)	☐ Yes	☐ No
12 Does the ESOP hold any stock that is not readily tradable on an established securities market?	☐ Yes	☐ No

For Paperwork Reduction Act Notice, see the Instructions for Form 5500.

Schedule R (Form 5500) 2021
v. 201209

Part V Additional Information for Multiemployer Defined Benefit Pension Plans

13 Enter the following information for each employer that contributed more than 5% of total contributions to the plan during the plan year (measured in dollars). See instructions. *Complete as many entries as needed to report all applicable employers.*

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

- 14** Enter the number of deferred vested and retired participants (inactive participants), as of the beginning of the plan year, whose contributing employer is no longer making contributions to the plan for:

a The current plan year. Check the box to indicate the counting method used to determine the number of inactive participants: ☐ last contributing employer ☐ alternative ☐ reasonable approximation (see instructions for required attachment).....

14a

b The plan year immediately preceding the current plan year. ☐ Check the box if the number reported is a change from what was previously reported (see instructions for required attachment).....

14b

c The second preceding plan year. ☐ Check the box if the number reported is a change from what was previously reported (see instructions for required attachment).....

14c

- 15** Enter the ratio of the number of participants under the plan on whose behalf no employer had an obligation to make an employer contribution during the current plan year to:

a The corresponding number for the plan year immediately preceding the current plan year.....

15a

b The corresponding number for the second preceding plan year.....

15b

- 16** Information with respect to any employers who withdrew from the plan during the preceding plan year:

a Enter the number of employers who withdrew during the preceding plan year.....

16a

b If line 16a is greater than 0, enter the aggregate amount of withdrawal liability assessed or estimated to be assessed against such withdrawn employers.....

16b

- 17** If assets and liabilities from another plan have been transferred to or merged with this plan during the plan year, check box and see instructions regarding supplemental information to be included as an attachment..... ☐

Part VI Additional Information for Single-Employer and Multiemployer Defined Benefit Pension Plans

- 18** If any liabilities to participants or their beneficiaries under the plan as of the end of the plan year consist (in whole or in part) of liabilities to such participants and beneficiaries under two or more pension plans as of immediately before such plan year, check box and see instructions regarding supplemental information to be included as an attachment..... ☐

- 19** If the total number of participants is 1,000 or more, complete lines (a) through (c)

a Enter the percentage of plan assets held as:

Stock: _____% Investment-Grade Debt: _____% High-Yield Debt: _____% Real Estate: _____% Other: _____%

b Provide the average duration of the combined investment-grade and high-yield debt:

☐ 0-3 years ☐ 3-6 years ☐ 6-9 years ☐ 9-12 years ☐ 12-15 years ☐ 15-18 years ☐ 18-21 years ☐ 21 years or more

c What duration measure was used to calculate line 19(b)?

☐ Effective duration ☐ Macaulay duration ☐ Modified duration ☐ Other (specify): _____

- 20 PBGC missed contribution reporting requirements.** If this is a multiemployer plan or a single-employer plan that is not covered by PBGC, skip line 20.

a Is the amount of unpaid minimum required contributions for all years from Schedule SB (Form 5500) line 40 greater than zero? ☐ Yes ☐ No

b If line 20a is "Yes," has PBGC been notified as required by ERISA sections 4043(c)(5) and/or 303(k)(4)? Check the applicable box:

☐ Yes.

☐ No. Reporting was waived under 29 CFR 4043.25(c)(2) because contributions equal to or exceeding the unpaid minimum required contribution were made by the 30th day after the due date.

☐ No. The 30-day period referenced in 29 CFR 4043.25(c)(2) has not yet ended, and the sponsor intends to make a contribution equal to or exceeding the unpaid minimum required contribution by the 30th day after the due date.

☐ No. Other. Provide explanation _____

The Miller Group 401(k) Plan

**Financial Statements
and Supplemental Schedule**
As of December 31, 2021 and 2020 and
for the Year Ended December 31, 2021

The Miller Group 401(k) Plan

Financial Statements and Supplemental Schedule

As of December 31, 2021 and 2020 and for the Year Ended December 31, 2021

The Miller Group 401(k) Plan

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Independent Auditor's Report

The Plan Administrator and Participants
The Miller Group 401(k) Plan
San Antonio, Texas

Scope and Nature of the ERISA Section 103(a)(3)(C) Audit of the 2021 Financial Statements

We have performed an audit of the financial statements of The Miller Group 401(k) Plan (the Plan), an employee benefit plan subject to the Employee Retirement Income Security Act of 1974 (ERISA), as permitted by ERISA Section 103(a)(3)(C). The financial statements comprise the statement of net assets available for benefits as of December 31, 2021, and the related statement of changes in net assets available for benefits for the year ended December 31, 2021, and the related notes to the financial statements (2021 financial statements).

Management, having determined it is permissible in the circumstances, has elected to have the audit of the Plan's 2021 financial statements performed in accordance with ERISA Section 103(a)(3)(C) pursuant to 29 CFR 2520.103-8 of the Department of Labor's (DOL) Rules and Regulations for Reporting and Disclosure under ERISA (ERISA Section 103(a)(3)(C) audit). As permitted by ERISA Section 103(a)(3)(C), our audit need not extend to any statements or information related to assets held for investment of the Plan (investment information) by a bank or similar institution or insurance carrier that is regulated, supervised, and subject to periodic examination by a state or federal agency (qualified institution), provided that the investment information is prepared and certified to by the qualified institution in accordance with 29 CFR 2520.103-5 of the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.

Management has obtained a certification from a qualified institution as of December 31, 2021, and for the year then ended, stating that the certified investment information, as described in Note 4 to the financial statements, is complete and accurate.

Opinion on the 2021 Financial Statements

In our opinion, based on our audit and the procedures performed as described in the *Auditor's Responsibilities for the Audit of the 2021 Financial Statements* section of our report:

- The amounts and disclosures in the accompanying 2021 financial statements, other than those agreed to or derived from the certified investment information, are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP).
- The certified investment information in the accompanying 2021 financial statements agrees to, or is derived from, in all material respects, the information prepared and certified by a qualified institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).



Basis for Opinion on the 2021 Financial Statements

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the 2021 Financial Statements* section of our report. We are required to be independent of the Plan and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our ERISA Section 103(a)(3)(C) audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with U.S. GAAP, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error. Management's election of the ERISA Section 103(a)(3)(C) audit does not affect management's responsibility for the financial statements.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Plan's ability to continue as a going concern within one year after the date that the financial statements are issued or available to be issued.

Management is responsible for maintaining a current plan instrument, including all plan amendments. Management is also responsible for administering the Plan and determining that the Plan's transactions that are presented and disclosed in the financial statements are in conformity with the Plan's provisions, including maintaining sufficient records with respect to each of the participants, to determine the benefits due or which may become due to such participants.

Auditor's Responsibilities for the Audit on the 2021 Financial Statements

Except as described in the *Scope and Nature of the ERISA Section 103(a)(3)(C) Audit of the 2021 Financial Statements* section of our report, our objectives are to obtain reasonable assurance about whether the 2021 financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and, therefore, is not a guarantee that an audit conducted in accordance with GAAS will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.



In performing an audit in accordance with GAAS, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Plan's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Plan's ability to continue as a going concern for a reasonable period of time.

Our audit did not extend to the certified investment information, except for obtaining and reading the certification, comparing the certified investment information with the related information presented and disclosed in the 2021 financial statements, and reading the disclosures relating to the certified investment information to assess whether they are in accordance with the presentation and disclosure requirements of U.S. GAAP.

Accordingly, the objective of an ERISA Section 103(a)(3)(C) audit is not to express an opinion about whether the 2021 financial statements as a whole are presented fairly, in all material respects, in accordance with U.S. GAAP.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the 2021 audit.

Other Matter - 2021 Supplemental Schedule Required by ERISA

The supplemental Schedule H, Line 4i - Schedule of Assets (Held at End of Year) as of December 31, 2021 is presented for purposes of additional analysis and is not a required part of the 2021 financial statements but is supplementary information required by the DOL's Rules and Regulations for Reporting and Disclosure under ERISA. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the 2021 financial statements. The information included in the supplemental schedule, other than that agreed to or derived from the certified investment information, has been subjected to auditing procedures applied in the audit of the 2021 financial statements and to certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the 2021 financial statements or to the 2021 financial statements themselves, and to other additional



procedures in accordance with GAAS. For information included in the supplemental schedule that agreed to or is derived from the certified investment information, we compared such information to the related certified investment information.

In forming our opinion on the supplemental schedule, we evaluated whether the supplemental schedule, other than the information agreed to or derived from the certified investment information, including its form and content, is presented in conformity with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.

In our opinion:

- The form and content of the supplemental schedule, other than the information in the supplemental schedule that agreed to or is derived from the certified investment information, is presented, in all material respects, in conformity with the DOL's Rules and Regulations for Reporting and Disclosure under ERISA.
- The certified investment information in the supplemental schedule agrees to, or is derived from, in all material respects, the information prepared and certified by a qualified institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Other Matter - Report on the 2020 Financial Statements

The statement of net assets available for benefits of the Plan as of December 31, 2020 was audited by other auditors. As permitted by 29 CFR 2520.103-8 of the DOL's Rules and Regulations for Reporting and Disclosure under ERISA, the Plan Administrator instructed them not to perform, and they did not perform, any auditing procedures with respect to the information certified by a qualified institution. Their audit report, dated November 23, 2021, indicated that:

- The amounts and disclosures in the 2020 financial statements, other than those agreed to or derived from the certified investment information, were presented fairly, in all material respects, in accordance with U.S. GAAP.
- The certified investment information in the 2020 financial statements agreed to, or was derived from, in all material respects, the information prepared and certified by a qualified institution that management determined met the requirements of ERISA Section 103(a)(3)(C).

BDO USA, LLP

October 17, 2022

Financial Statements

The Miller Group 401(k) Plan

Statements of Net Assets Available for Benefits

<i>December 31,</i>	2021	2020
Assets		
Investments:		
Investments, at fair value	\$ 5,652,612	\$ 5,935,515
Investments, at contract value	902,449	928,834
Total Investments	6,555,061	6,864,349
Receivables:		
Participant contributions	24,653	15,339
Employer contributions	8,351	6,629
Notes receivable from participants	56,164	96,225
Total Receivables	89,168	118,193
Net Assets Available for Benefits	\$ 6,644,229	\$ 6,982,542

See accompanying notes to financial statements.

The Miller Group 401(k) Plan

Statement of Changes in Net Assets Available for Benefits

Year ended December 31, 2021

Additions

Investment income:

Net appreciation in fair value of investments \$ 783,527

Interest and dividends 9,379

Total Investment Income 792,906

Interest on notes receivable from participants 4,621

Contributions:

Participant contributions 569,602

Employer contributions 255,269

Rollover contributions 28,423

Total Contributions 853,294

Total Additions 1,650,821

Deductions

Benefits paid to or on behalf of participants 1,945,092

Administrative expenses 44,042

Total Deductions 1,989,134

Net Change in Net Assets Available for Benefits (338,313)

Net Assets Available for Benefits, beginning of year 6,982,542

Net Assets Available for Benefits, end of year \$ 6,644,229

See accompanying notes to financial statements.

The Miller Group 401(k) Plan

Notes to Financial Statements

1. Description of the Plan

The following description of The Miller Group 401(k) Plan (the Plan) provides only general information. Participants should refer to the Plan agreement or Summary Plan Description (SPD) for a more complete description of the Plan's provisions.

General

The Plan is sponsored by CKM Industries, Inc. and related companies, including MES Partners, Inc.; Miller Environmental Services, LLC; and Belco Industrial Services, LLC (collectively, the Company or Plan Sponsor) for its employees. The Plan is designed to comply with the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 (ERISA), and the Internal Revenue Code (IRC). The Plan's financial statements and supplemental schedule have been prepared in compliance with ERISA.

Eligibility

All employees of the Company—except leased employees, non-resident aliens, employees covered by a collective bargaining agreement, and independent contractors—who have completed at least three months of service, who are age 21 or older, and who have completed 1,000 hours of service are eligible to participate in the Plan.

Participant Contributions

Each year, eligible employees may contribute up to 100% of their annual compensation, as defined by the Plan, not to exceed the limits as determined by the IRC, through payroll deductions. Participants may also contribute amounts representing distributions from other qualified plans (rollover contributions). Participants who have attained age 50 before the end of the plan year may also contribute catch-up contributions not to exceed IRC limits.

Employer Contributions

The Company has elected to make a safe-harbor matching contribution of 100% of deferrals up to 3% of eligible compensation and 50% of deferrals thereafter up to 5% of eligible compensation.

The Company also may make a discretionary contribution equal to a uniform percentage of matched employee contributions to the Plan. Additional profit-sharing amounts may be contributed at the option of the Company's Board of Directors.

Participant Accounts

Each participant's account is credited with the participant's contributions, employer contributions, and earnings or losses, and may be charged with certain administrative expenses. Plan earnings or losses are applied to a participant's account balance based on the investment experience of the funds held and the number of shares owned in each fund by the participant.

The Miller Group 401(k) Plan

Notes to Financial Statements

Vesting

Participants are immediately vested in their contributions and safe harbor contributions and actual earnings or losses thereon. Vesting in the Company's discretionary matching and profit sharing, if any, contributions is based on years of service as follows:

Years of Service	Vested (%)
Less than 2 years	-
2	20
3	40
4	60
5	80
6 or more	100

Upon death or disability, the participant (or their beneficiary in case of their death) becomes 100% vested in the Plan. Upon reaching normal retirement age or after six years in the Plan, the participant becomes 100% vested in the Plan.

Forfeitures

Forfeitures of terminated participants' non-vested account balances are retained in the Plan and may be used to pay administrative expenses to reduce future employer contributions to the Plan. For the year ended December 31, 2021, forfeited balances applied and used to offset employer contributions were \$20,547. At December 31, 2020, there were \$17,041 in unallocated forfeitures. There were no unallocated forfeitures at December 31, 2021.

CARES Act

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was enacted and signed into law. The CARES Act, among other things, included several relief provisions available to tax-qualified retirement plans and their participants. Plan management has evaluated the relief provisions available to plan participants under the CARES Act and has implemented the following provisions: (a) special coronavirus distributions up to \$100,000, (b) suspended required minimum distributions for 2020, and (c) allowed qualifying participants to delay loan repayments.

Payment of Benefits

The benefit to which a participant is entitled equals the value of the participant's vested interest in their account. Upon termination of service due to death, disability, severance, or retirement, a participant may elect to receive a lump-sum payment equal to the vested portion of their account. Additionally, under certain circumstances of financial hardship, including the relief provisions under the CARES Act, the participant is allowed to withdraw funds from the Plan. Upon termination of employment, vested account balances of less than \$5,000 will be rolled over to an Individual Retirement Account if withdrawal of the funds is not initiated by the participant. Account balances less than \$1,000 are distributed to participants as a lump-sum distribution.

The Miller Group 401(k) Plan

Notes to Financial Statements

Investment Options

Participants direct the investment of their contributions into various investment options offered by the Plan. The Plan currently offers a menu of mutual fund options for investment.

Notes Receivable from Participants

Prior to January 1, 2020, participants were allowed to borrow from their accounts a minimum of \$1,000 up to the lesser of \$50,000 or 50% of their vested account balance. Participants may have only two loans outstanding at a time. The loans are secured by the balance in the participant's account and bear interest at a rate set by the Plan administrator, currently ranging from 4.50% to 6.75%. Any loan must be repaid within five years unless otherwise approved. Principal and interest are paid ratably through payroll deductions. Effective January 1, 2020, the Company amended the Plan to no longer allow participants to borrow from their accounts.

Administrative Expenses

Fees and expenses incurred in the administration of the Plan, to the extent not paid by the Company, are charged to and paid from the Plan's assets. Certain expenses of maintaining the Plan are paid directly by the Company and are excluded from these financial statements. Fees related to participant-initiated transactions are charged directly to the specific participant generating the transaction.

2. Summary of Significant Accounting Policies

Basis of Accounting

The accompanying financial statements of the Plan have been prepared under the accrual basis of accounting in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP).

Use of Estimates

The preparation of financial statements in conformity with U.S. GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and the disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of changes in net assets during the reporting period. Actual results could differ from those estimates. Significant items subject to such estimates and assumptions include the fair value of investments.

Risks and Uncertainties

The Plan invests in various investment securities. Investment securities are exposed to various risks, such as interest rate, market, and credit risks. Due to the level of risk associated with certain investment securities, it is at least reasonably possible that changes in the values of investment securities will occur in the near term and that such changes could materially affect the amounts reported in the statements of net assets available for benefits.

The Miller Group 401(k) Plan

Notes to Financial Statements

Investment Valuation and Income Recognition

Investments are reported at fair value with the exception of fully benefit-responsive investment contracts. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The Company determines the Plan's valuation policies utilizing information provided by the investment advisers, custodians, and insurance company. See Note 3 for further discussion of fair value measurements.

The Plan's fully benefit-responsive investment contract (Note 5) is valued at contract value.

Purchases and sales of investments are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date. Net appreciation includes the Plan's gains and losses for investments bought and sold, as well as held during the year.

Payment of Benefits

Benefits are recorded when paid.

Notes Receivable from Participants

Notes receivable from participants are measured at their unpaid principal balance plus any accrued but unpaid interest. Interest income is recorded on the accrual basis. Related fees are recorded as administrative expenses when they are incurred. No allowance for credit losses has been recorded as of December 31, 2021 or 2020. If a participant ceases to make loan repayments and the Plan administrator deems the participant loan to be in default, unless the loan repayment was deemed deferred under the CARES Act, the participant loan balance is reduced, and benefit payment is recorded.

3. Fair Value Measurements

The accounting standards establish a three-tier fair value hierarchy, which prioritizes the inputs used in measuring fair value. The hierarchy places the highest priority on unadjusted quoted market prices in active markets for identical assets or liabilities (Level 1 measurements) and gives the lowest priority to unobservable inputs (Level 3 measurements).

The three levels of inputs within the fair value hierarchy are defined as follows:

Level 1 - This level consists of quoted prices (unadjusted) for identical assets or liabilities in active markets that the Plan has the ability to access as of the measurement date.

Level 2 - This level consists of significant other observable inputs other than Level 1 inputs, such as quoted prices for similar assets or liabilities, quoted prices in markets that are not active, or other inputs that are observable or can be corroborated by observable market data.

Level 3 - This level consists of significant unobservable inputs that reflect the Plan's own assumptions about the assumptions that market participants would use in pricing an asset or liability.

In some cases, a valuation technique used to measure fair value may include inputs from multiple levels of the fair value hierarchy. The lowest level of significant input determines the placement of the entire fair value measurement in the hierarchy.

The Miller Group 401(k) Plan

Notes to Financial Statements

The following is a description of the valuation methods and assumptions used by the Plan to estimate the fair value of its investments:

Mutual Funds - These are valued at the daily closing price as reported by the fund. Mutual funds held by the Plan are open-end mutual funds that are registered with the Securities and Exchange Commission. These funds are required to publish their daily net asset value (NAV) and to transact at that price. The mutual funds held by the Plan are deemed to be actively traded.

The following tables present the Plan's fair value hierarchy by asset class for those assets measured at fair value:

December 31, 2021

	Fair Value Measurements			
	Level 1	Level 2	Level 3	Total
Mutual funds	\$ 5,652,612	\$ -	\$ -	\$ 5,652,612

December 31, 2020

	Fair Value Measurements			
	Level 1	Level 2	Level 3	Total
Mutual funds	\$ 5,935,515	\$ -	\$ -	\$ 5,935,515

4. Certified Investments

Certain information related to investments and notes receivable from participants disclosed in the accompanying financial statements and ERISA-required supplemental schedule, including investments and notes receivable from participants held at December 31, 2021 and 2020, and net appreciation in fair value of investments, interest and dividends, and interest income on notes receivable from participants for the year ended December 31, 2021, was obtained by management and agreed to or derived from information certified as complete and accurate by Voya Retirement Insurance and Annuity Company (Voya).

The Plan's independent accountants did not perform any auditing procedures with respect to this information, except for comparing such information with the related information included in the financial statements and supplemental schedule.

5. Investment Contract with Insurance Company

The Plan entered into a group annuity contract with Voya Retirement Insurance and Annuity Company (Voya). Voya maintains the contributions in a general (fixed) account. The account is credited with earnings on the underlying investments and charged for participant withdrawals and administrative expenses. The guaranteed investment contract issuer is contractually obligated to repay the principal and a specified interest rate that is guaranteed to the Plan. Interest rates are established on the first day of each calendar month and apply to any regular ongoing contributions made to the general account in that month.

The Miller Group 401(k) Plan

Notes to Financial Statements

Because the guaranteed investment contract is fully benefit-responsive, contract value is the relevant measurement attribute for that portion of the net assets available for benefits attributable to the group annuity contract. Contract value, as reported to the Plan by Voya, represents contributions made under the contract, plus earnings, less participant withdrawals and administrative expenses. Participants ordinarily may direct the withdrawal or transfer of all or a portion of their investment at contract value. There are no reserves against contract value for credit risk of the contract issuer or otherwise.

Certain events limit the ability of the Plan to transact at contract value with the Voya. Such events include the following: (1) amendments to the Plan documents (including complete or partial plan termination or merger with another plan), (2) changes to the Plan's prohibition on competing investment options or deletion of equity wash provisions, (3) bankruptcy of the Plan Sponsor or other Plan Sponsor events (for example, divestitures or spin-offs of a subsidiary) that cause a significant withdrawal from the Plan, or (4) the failure of the trust to qualify for exemption from federal income taxes or any required prohibited transaction exemption under ERISA. The Plan Administrator believes that any events that would limit the Plan's ability to transact at contract value with participants are not probable of occurring.

The guaranteed investment contract does not permit the insurance company to terminate the agreement prior to the scheduled maturity date.

6. Plan Termination

Although it has not expressed any intent to do so, the Company has the right under the Plan to discontinue its contributions at any time and terminate the Plan subject to the provisions of ERISA. In the event of Plan termination, participants would become fully vested in their accounts.

7. Tax Status of the Plan

The Company adopted a prototype plan document sponsored by Voya. Voya received an opinion letter from the Internal Revenue Service (IRS) dated June 30, 2020, which states that the prototype document satisfies the applicable provisions of the IRC. The Plan itself has not received a determination letter from the IRS; however, the Plan's management believes that the Plan is currently designed and being operated in compliance with the applicable requirements of the IRS; therefore, no provision for income taxes has been included in the Plan's financial statements.

U.S. GAAP requires Plan management to evaluate tax positions taken by the Plan and recognize a tax liability (or asset) if the Plan has taken an uncertain position that more likely than not would not be sustained upon examination by the IRS. The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax periods in progress.

8. Related Party and Parties-in-Interest Transactions

Parties-in-interest are defined under Department of Labor Regulations as any fiduciary of the Plan, any party rendering services to the Plan, the employer, and certain others. As such, transactions, such as investments, purchases and sales, and other administrative transactions conducted by the trustee and its affiliates, qualify as party-in-interest transactions.

The Miller Group 401(k) Plan

Notes to Financial Statements

The Plan also pays for third-party administrator and investment advisory fees, which qualify as party-in-interest transactions. The Plan also issues loans to participants which are secured by the vested balance of the participants' accounts. Certain management fees in the form of an expense ratio charged to each investment option are paid by the Plan and deducted from earnings on investments. These transactions are party-in-interest transactions which are exempt from prohibited transaction rules.

9. Subsequent Events

The Plan administrator evaluated events or transactions that occurred after December 31, 2021 and through October 17, 2022, the date the financial statements were available to be issued.

Supplemental Schedule

The Miller Group 401(k) Plan

Schedule H, Line 4i - Schedule of Assets (Held at End of Year)

EIN: 74-2376364

Plan No.: 001

December 31, 2021

(a)	(b)	(c)	(d)	(e)
Identity of Issuer, Borrower, Lessor, or Similar Party	Description of Investment, Including Maturity Date, Rate of Interest, Collateral, Par, or Maturity Value	Cost	Current Value	
Mutual Funds				
BlackRock	BlackRock LifePath® Index 2035 K	**	\$ 769,584	
BlackRock	BlackRock LifePath® Index 2045 K	**	651,737	
BlackRock	BlackRock LifePath® Index 2030 K	**	638,587	
BlackRock	BlackRock LifePath® Index Retire K	**	570,774	
T. Rowe Price	T. Rowe Price Blue Chip Growth	**	541,989	
BlackRock	BlackRock LifePath® Index 2040 K	**	451,328	
BlackRock	BlackRock LifePath® Index 2025 K	**	437,305	
Vanguard	Vanguard Value Index Adm	**	393,144	
Schwab Funds	Schwab® S&P 500 Index	**	339,050	
BlackRock	BlackRock LifePath® Index 2050 K	**	217,720	
Janus Henderson	Janus Henderson Triton N	**	203,266	
Virtus	Virtus KAR Small-Cap Growth R6	**	131,501	
BlackRock	BlackRock LifePath® Index 2055 K	**	77,316	
American Funds	American Funds New Perspective R6	**	54,962	
MFS	MFS Mid Cap Growth R6	**	53,175	
Invesco	Invesco S&P 500® Equal Weight ETF	**	51,867	
BlackRock	BlackRock LifePath® Index 2060 K	**	20,560	
Vanguard	Vanguard Interm-Term Bond Index Adm	**	11,955	
PGIM Investments	PGIM Total Return Bond R6	**	8,309	
Vanguard	Vanguard Information Technology Idx Adm	**	6,763	
Vanguard	Vanguard Total Stock Mkt Idx Adm	**	6,407	
Vanguard	Vanguard Mid Cap Index Admiral	**	4,364	
* Voya	Voya Intermediate Bond R6	**	3,680	
Vanguard	Vanguard Developed Markets Index Admiral	**	2,641	
Vanguard	Vanguard Small Cap Index Adm	**	2,499	
Vanguard	Vanguard Small Cap Growth Index Admiral	**	1,340	
American Century	American Century Emerging Markets R6	**	330	
Dimensional Fund Advisors	DFA US Targeted Value I	**	148	
MFS	MFS Intl Diversification R6	**	146	
BlackRock	BlackRock Health Sciences Opps K	**	145	
* Voya	Voya Government Money Market Fund	**	20	
Total Mutual Funds				5,652,612
Fixed Income Fund				
* Voya	Voya Fixed Account	**		902,449
Total Investments				6,555,061
* Participant Loans	Interest rates range from 4.50% to 6.75%	-		56,165
Total				\$ 6,611,226

* A party-in-interest, as defined by ERISA.

** Cost is not required since all investments are participant-directed.



REPORT TO THOSE CHARGED WITH GOVERNANCE

MILLER ENVIRONMENTAL EMPLOYEE BENEFIT PLAN TRUST

Audit Wrap Up:
Year Ending December 31, 2021

Contents

QUICK ACCESS TO THE
FULL REPORT

The following communication was prepared as part of our audit, has consequential limitations, and is intended solely for the information and use of those charged with governance (e.g., Board of Directors and audit committee) and, if appropriate, management of the Company and is not intended and should not be used by anyone other than these specified parties.

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Welcome

October 17, 2022

Tim Burke, Chief Financial Officer, Plan Administrator
Miller Environmental Employee Benefit Plan Trust

Professional standards require us to communicate with you regarding matters related to the plan audit that are, in our professional judgment, significant and relevant to your responsibilities in overseeing the financial reporting process. On August 24, 2022, we presented an overview of our plan for the audit of the financial statements of the Miller Environmental Employee Benefit Plan Trust (the Plan) as of and for the year ended December 31, 2021, including a summary of our overall objectives for the audit, and the nature, scope, and timing of the planned audit work.

This communication is intended to elaborate on the significant findings from our audit, including our views on the qualitative aspects of the Plan's accounting practices and policies, Plan management's judgments and estimates, financial statement disclosures, and other required matters.

We are pleased to be of service to the Plan and look forward to meeting with you to discuss our audit findings, as well as other matters that may be of interest to you, and to answer any questions you might have.

Respectfully,

A handwritten signature in dark ink that reads "BDO USA, LLP". The signature is written in a cursive, stylized font.

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Status of our Audit

Status of Our Audit

We have completed our audit of the financial statements, including procedures applied to the supplemental schedule, of Miller Environmental Employee Benefit Plan Trust (the Plan) as of and for the year ended December 31, 2021. Our audit was conducted in accordance with auditing standards generally accepted in the United States of America (GAAS). This audit of the financial statements does not relieve Plan management or those charged with governance of their responsibilities. The term “those charged with governance” encompasses the term Board of Directors or Audit Committee or other formally designated body that has financial oversight responsibilities.



Status of Our Audit

- ▶ The objective of our financial statement audit was to obtain reasonable - not absolute - assurance about whether the financial statements are free from material misstatements.
- ▶ The scope of the work performed was substantially the same as that described to you in our earlier Audit Planning communications.
- ▶ As permitted by ERISA Section 103(a)(3)(C) pursuant to 29 CFR 2520.103-8 of the Department of Labor's (DOL) Rules and Regulations for Reporting and Disclosure under ERISA and as instructed by you, we have conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and have obtained sufficient and appropriate audit evidence to provide a basis for our ERISA Section 103(a)(3)(C) audit opinion. The audit did not extend to the certified investment information, except for obtaining and reading the certification, comparing the certified information with the related information presented and disclosed in the financial statements, and reading the disclosures relating to the certified investment information to assess whether they are in accordance with the presentation and disclosure requirements of accounting principles generally accepted in the United States of America ("GAAP"). Accordingly, the objective of the ERISA Section 103(a)(3)(C) audit is not to express an opinion about whether the financial statements as a whole are presented fairly, in all material respects, in accordance with GAAP.
- ▶ In accordance with professional standards, we have obtained a substantially complete Form 5500 and considered whether such information, or the manner of its presentation, was materially inconsistent with its presentation in the financial statements. Our responsibility also includes calling to management's attention any information that we believe is a material misstatement of fact. We have not identified any material inconsistencies or concluded there are any material misstatements of facts in the other information
- ▶ All records and information requested were freely available for our inspection.
- ▶ Plan management's cooperation was excellent. We received full access to all information that we requested while performing our audit, and we acknowledge the full cooperation extended to us by all levels of Plan personnel throughout the course of our work.



Results of our Audit

RESULTS OF OUR AUDIT

Accounting Practices, Policies, and Estimates

The following summarizes the more significant required communications related to our audit concerning the Plan's accounting practices, policies, and estimates :

The Plan's significant accounting practices and policies are those included in the notes to the financial statements. These accounting practices and policies are appropriate, comply with generally accepted accounting principles and industry practice, were consistently applied, and are adequately described within the notes to the financial statements.

- ▶ A summary of recently issued accounting pronouncements is included in Note 2 to the Plan's financial statements.

Significant estimates are those that require management's most difficult, subjective, or complex judgments, often as a result of the need to make estimates about the effects of matters that are inherently uncertain. The Plan's significant accounting estimates, including a description of management's processes and significant assumptions used in development of the estimates, are disclosed in Note of the financial statements.

- ▶ Plan management did not make any significant changes to the processes or significant assumptions used to develop the critical accounting estimates in 2021.

CORRECTED AND UNCORRECTED MISSTATEMENTS

There were no corrected misstatements, other than those that were clearly trivial, related to accounts and/or disclosures that we brought to the attention of Plan management.

There were no uncorrected misstatements, other than those that were clearly trivial, related to accounts and/or disclosures that we presented to Plan management.

QUALITY OF THE PLAN'S FINANCIAL REPORTING

A discussion was held regarding the quality of the Plan's financial reporting, which included the following:

- ▶ Qualitative aspects of significant accounting policies and practices
- ▶ Our conclusions regarding significant accounting estimates
- ▶ Significant unusual transactions
- ▶ Financial statement presentation



Reportable Findings and Internal Control Over Financial Reporting



Reportable Findings and Internal Control Over Financial Reporting

We are required to communicate, in writing and in a timely manner, to those charged with governance all reportable findings and all material weaknesses and significant deficiencies that have been identified in the Plan's internal control over financial reporting. The definitions of a reportable finding, control deficiency, significant deficiency and material weakness are as follows:

Category	Definition
	Matters that are one or more of the following: a. An identified instance of noncompliance or suspected noncompliance with laws or regulations b. A finding arising from the audit that is, in the auditor's professional judgment, significant and relevant to those charged with governance regarding their responsibility to oversee the financial reporting process c. An indication of deficiencies in internal control identified during the audit that have not been communicated to management by other parties and that, in the auditor's professional judgment, are of sufficient importance to merit management's attention
Reportable Finding	
Deficiency in Internal Control	A deficiency in internal control over financial reporting exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis.
Significant Deficiency	A deficiency or a combination of deficiencies in internal control over financial reporting that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.
Material Weakness	A deficiency or a combination of deficiencies in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the financial statements will not be prevented or detected on a timely basis.
A reportable finding may also be considered a deficiency in internal control, a significant deficiency or a material weakness.	
We considered the Plan's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Plan's internal control. Accordingly, we do not express an opinion on the effectiveness of the Plan's internal control.	
Our consideration was for the limited purpose described above and was not designed to identify all deficiencies in internal control that might be significant deficiencies or material weaknesses and/or all reportable findings.	
In conjunction with our audit of the Plan financial statements, we noted no material weaknesses.	



Additional Required Communications



Additional Required Communications

Following is a summary of those required items, along with specific discussion points as they pertain to the Plan.

Requirement	Discussion Point
Independence	Our engagement letter to you dated August 24, 2022, describes our responsibilities in accordance with professional standards and certain regulatory authorities with regard to independence and the performance of our services. This letter also stipulates the responsibilities of the Plan Sponsor or Plan with respect to independence as agreed to by the Plan Sponsor. Please refer to that letter for further information.
Significant changes to planned audit strategy or significant risks initially identified	There were no significant changes to the planned audit strategy or significant risks initially identified and previously communicated to those charged with governance as part of our Audit Planning communications.
Obtain information from those charged with governance relevant to the audit	There were no matters noted relevant to the audit, including, but not limited to: violations or possible violations of laws or regulations; risk of material misstatements, including fraud risks; or tips or complaints regarding the Plan's financial reporting that we were made aware of as a result of our inquiry of those charged with governance.
Consultations with other accountants	We are not aware of any consultations about accounting or auditing matters between management and other independent public accountants. Nor are we aware of opinions obtained by management from other independent public accountants on the application of generally accepted accounting principles.
Significant findings and issues arising during the audit in connection with the Plan's related parties	We have evaluated whether the identified related party relationships and transactions have been appropriately identified, accounted for, and disclosed and whether the effects of the related party relationships and transactions, based on the audit evidence obtained, prevent the financial statements from achieving fair presentation.

Additional Required Communications

Following is a summary of those required items, along with specific discussion points as they pertain to the Plan.

Requirement	Discussion Point
Disagreements with Plan management	There were no disagreements with Plan management about matters, whether or not satisfactorily resolved, that individually or in aggregate could be significant to the Plan's financial statements or to our auditor's report.
Significant difficulties encountered during the audit	There were no significant difficulties encountered during the audit.
Other matters significant to the oversight of the Plan's financial reporting process, including complaints or concerns regarding accounting or auditing matters	There are no other matters that we consider significant to the oversight of the Plan's financial reporting process that have not been previously communicated.
Representations requested from management	Please refer to the management representation letter.



Significant Regulatory, Accounting, Auditing & Reporting Discussion Matters



REGULATORY MATTERS

THE CONSOLIDATED APPROPRIATIONS ACT, 2021

The Consolidated Appropriations Act, 2021 (CAA21) is a year-end stimulus bill passed on December 21, 2020 that provides for federal funding as well as additional COVID-19 pandemic relief. Key relief measures include:

- Qualified disaster distributions While CAA21 does not extend coronavirus-related distributions (CRDs) and expanded participant plan loan rules available under the CARES Act, it does permit employers to amend certain plans (including 401(k) and 403(b) plans, but excluding Defined Benefit [DB] plans) to permit participants to receive a non-COVID Qualified Disaster Distribution (QDD) if the participant meets all of the following requirements:
 - The participant's principal abode was located within a qualified disaster area during the incident period.
 - The participant suffered an economic loss by reason of the qualified disaster
 - The distribution (per disaster) does not exceed \$100,000
 - The distribution is made before June 19, 2021

Income tax on QDDs may be spread over three years and participants may repay QDDs in full. They are also exempt from the 10% early withdrawal penalty.

Qualified Disaster Plan Loans

- Defined Contribution (DC) plans may be amended to permit participants to receive Qualified Disaster Loans (QDLs) if the participant's principal abode was located within a qualified disaster area during the incident period and the participant suffered an economic loss by reason of a qualified disaster.
- QDLs have a higher maximum limit than ordinarily permitted for plan loans (\$100,000 [reduced by the highest outstanding loan balance within the past 12 months up to 100% of the participant's vested account balance] compared with an ordinary plan loan maximum limit of \$50,000 [reduced by the highest outstanding loan balance within the past 12 months or 50% of the participant's vested account balance]).
- Delayed payments are permitted for existing plan loans if the payment is due between the first day of the incident period and 180 days after the end of the incident period. A delay of (i) one year after the date the payment was due, or (ii) until June 19, 2021 is permitted although interest accrues and resumed payments must be adjusted to account for the delay. The delay period may also extend a plan loan's general five-year time period limit.

As indicated above, the COVID-19 pandemic is not considered a qualified disaster.

REGULATORY MATTERS

THE CONSOLIDATED APPROPRIATIONS ACT, 2021

The CAA21 also provides for the following:

- ▶ Hardship distributions for repayment of principal residence - 401(k) or 403(b) plans may be amended to permit participants to repay certain hardship withdrawals that were obtained to build a home, but were not used to do so because of a qualified disaster. To qualify for the repayment right, a participant has to meet both of the following requirements:
 - The hardship withdrawal must have been obtained not earlier than 180 days before the incident period began and not later than 30 days after the end of the incident period.
 - Repayment to the plan (or another employer's tax-qualified retirement plan that accepts rollovers or to an IRA of the participant) must be made by June 19, 2021.
- ▶ Termination of DB plan Qualified Future Transfers- IRC Section 402 permits qualified future transfers (e.g., transfers of excess pension plan assets to fund up to ten years of retiree health or life costs within the DB plan if certain requirements are met). CAA21 permits employers that had previously elected to make a qualified future transfer to make a one-time election (by December 31, 2021) to terminate the qualified future transfer and restore unused funds to the plan. The amounts must be transferred back into the health or life insurance account within four years after the original transfer period or the CAA21 termination election will be treated as a taxable employer reversion. (This relief may be a potential benefit for overfunded DB plans that were impacted by unexpected market losses related to the COVID-19 pandemic.)

Plan amendments for changes made under CAA21 must be made by the last day of the first plan year beginning on or after Jan 1, 2022 (Jan 1, 2024 for governmental plans), which would be December 31, 2022 for calendar year plans.



BDO is closely monitoring the evolving impact of COVID-19. For the latest information, refer to [Crisis Response Resource Center](#) at [BDO.com](#).

REGULATORY MATTERS

PANDEMIC REGULATORY RELIEF

CORONAVIRUS AID, RELIEF, AND ECONOMIC SECURITY ACT (CARES ACT)

The CARES Act is an aid package designed to address the effects of the COVID-19 pandemic and contains several provisions impacting plans, including the following:

- ▶ Coronavirus-related hardship distributions of up to \$100,000 from a retirement plan or IRA without a 10% early withdrawal penalty. Eligible distributions could be taken before December 31, 2020, and must be repaid within three years to avoid taxation. The plan administrators were allowed to rely on an employee's certification that the employee satisfies the conditions for a coronavirus-related distribution.
- ▶ Expanded participant loans up to \$100,000 from qualified plans (whereas only \$50,000 was previously allowed) for a limited period during 2020. Delays in loan repayment were also permitted.
- ▶ Required minimum distributions (RMDs) were temporarily suspended for 2020 for certain retirement plans and accounts.
- ▶ Deferred 2020 minimum required employer contributions (including quarterly contributions) to single-employer defined benefit (DB) plans for single-employer plans to January 1, 2021 (IRS Notice 2020-82 subsequently extended this due date to the first business day following the January 1 federal holiday, which was January 4, 2021).

FAMILIES FIRST CORONAVIRUS RESPONSE ACT (FFCRA)

FFCRA consists of two primary mandates that were in effect through December 31, 2020:

- ▶ Federal Paid Sick Leave - Employers with less than 500 employees were required to provide all full time employees (regardless of employment length) with 80 hours of emergency paid sick leave (pro-rated hours for part-time employees) if the employee was unable to work/telework due to certain COVID-19 pandemic impact, including COVID-19 quarantine or isolation orders, school closures, or need to care for others. Generally, employees received their regular rate of pay for emergency sick leave (capped) if leave was taken for employees' own illness or quarantine and 2/3 of regular rate of pay for emergency sick leave (also capped) if leave was taken to care for others or due to school closures.
- ▶ Federal Paid Child Care Leave - Employers with less than 500 employees were required to provide employees (employed at least 30 days) with the right to take up to 12 weeks of job-protected leave if employee was unable to work due to having to care for a child if the child's school or childcare was closed (or unavailable), due to the COVID-19 public health emergency, with certain exclusions. Employees received 2/3 of regular rate of pay (capped). It required employers hold an employee's job open until the end of the leave period, with certain exceptions.

While these mandates ended on December 31, 2020, CAA21 permits employers to voluntarily provide any remaining FFCRA allotments to employees through March 31, 2021.



BDO is closely monitoring the evolving impact of COVID-19. For the latest information, refer to [Crisis Response Resource Center](https://www.bdo.com/crisis-response) at [BDO.com](https://www.bdo.com).

REGULATORY MATTERS

INTERNAL REVENUE SERVICE (IRS) AND COVID-19

IRS EXTENDS RELIEF FOR IN-PERSON NOTARIZATION

[IRS Notice 2021-03](#) extends from Jan 1, 2021 through June 30, 2021, the temporary relief provided in [IRS Notice 2020-42](#) from the physical presence requirement in Treasury Regs Section 1.401(a)-21(d)(6) for participant elections required to be witnessed by a plan representative or a notary public, including spousal consent required under IRC Section 417.

IRS INFORMATION RELEASE 2020-57: SMALL AND MIDSIZE EMPLOYERS MAY TAKE ADVANTAGE OF COVID-19 REFUNDABLE PAYROLL TAX CREDITS

U.S. Treasury Department, IRS and DOL announced that small and midsize employers may take advantage of two new refundable payroll tax credits, designed to immediately and fully reimburse employers, on a dollar-for-dollar immediate offset basis, for the cost of providing Coronavirus-related leave to their employees. Employers may deduct the amount that the employer paid as federal paid sick or childcare leave from any of these sources:

- ▶ Federal income tax withheld from all employees (not just those who take the paid leave)
- ▶ FICA tax withheld from all employees (not just those who take the paid leave)
- ▶ Employer share of FICA for all employees (not just those who take the paid leave)

It permits employers to retain and access funds that they would otherwise pay to the IRS in payroll taxes, thereby funding the paid leave credits. If amounts withheld are not sufficient to cover the cost of the paid leave, a rapid refund may be requested.

Subsequent to this announcement, the CARES Act provided for advance refunding of these payroll tax credits. CAA21 has revised the employee retention credit, which is now *retroactively* available for 2020 by employers who had Paycheck Protection Program (PPP) loans and *prospectively* available under expanded terms for the first two quarters of 2021.

IRC SECTION 139- DISASTER RELIEF PAYMENTS

Since COVID-19 was declared a national emergency in March 2020, employers may use IRC Section 139 to make tax-free payments or reimbursements to employees as qualified disaster relief payments.[□] These payments are made to reimburse or pay reasonable and necessary personal, family, temporary living, or funeral expenses incurred as a result of a qualified disaster. There is no cap on the amount of the relief payments and employers are not required to have a written plan (but having one is recommended) or collect proof of expenses from the employees. The payments cannot be reimbursed by insurance.

Qualified disaster relief payments are federal tax-free payments to employees and are fully deductible to the employer. Since tax-free, the payments are not reported on Form W-2 or 1099 and may not include non-essential, luxury, or decorative items or services. Additionally, wage replacement (such as paid sick or other leave) is not covered by Section 139 and is subject to income and payroll tax withholding and reporting. Generally, the state income tax treatment is the same as federal, but payments may be treated as “wages” for state unemployment insurance tax contributions.



BDO is closely monitoring the evolving impact of COVID-19. For the latest information, refer to [Crisis Response Resource Center](#) at [BDO.com](#).

REGULATORY MATTERS

SETTING EVERY COMMUNITY UP FOR RETIREMENT ENHANCEMENT ACT OF 2019 (SECURE ACT)

The SECURE Act (the Act), which was signed into law on December 20, 2019, is intended to address Americans' difficulty in saving for retirement. The act was part of the further Consolidated Appropriations Act (a federal spending bill) and includes a variety of provisions impacting retirement programs, both employees benefit plans and individual retirement accounts (IRAs). Some of the SECURE Act provisions are required to be (or may be) operationally implemented immediately by the sponsor of tax-qualified retirement plans (including 401(k), cash balance, defined benefit (DB) pension and 403 (b) plans).

Provisions of the Act that may require immediate attention from plan sponsors include (but are not limited to) the following:

Provisions of the Act (on demand) plan loans issued through credit cards or similar arrangements; effective immediately, any such new loans are treated as taxable distributions.

- Prohibits "on demand" plan loans issued through credit cards or similar arrangements; effective immediately, any such new loans are treated as taxable distributions.
- Provides new ERISA safe harbor for fiduciaries of defined contribution (DC) plans offering an annuity to plan participants (effective immediately).
- Increases the required minimum distribution (RMD) age to age 72.
- Eliminates the stretch RMD rules for certain beneficiaries of inherited IRAs or qualified plans.
- Allows penalty-free withdrawals from certain retirement plans for expenses related to childbirth or adoption.
- Provides special retirement plan disaster relief for 2018 California wildfires and other major disasters that occurred between January 1, 2018, and February 18, 2020.

- Permits adoption of new retirement plans retroactively effective for the prior plan year (plan must be adopted by the date of the sponsor's extended federal income tax filing deadline in the year following the desired adoption year and cannot be a salary deferral plan).

Plan sponsors are encouraged to educate themselves on the provisions and evaluate the need for action, including immediate operational changes and plan amendments.

Certain provisions of the SECURE Act have been subsequently superseded by the CARES Act (for instance, the CARES Act temporarily suspends RMDs).



REGULATORY MATTERS

IRS REQUIRED AMENDMENT LISTS (RAL) FOR INDIVIDUALLY DESIGNED PLANS (IDPS)



With the elimination by the Internal Revenue Service (IRS) of the staggered five-year determination letter amendment cycles for IDPs, the IDP determination letter program is limited to initial plan qualification, qualification upon plan termination and special exceptions. As a result of changes, the IRS now publishes an annual RAL that contains two parts. Part A addresses changes in qualification requirements that generally would require an amendment to most plans. Part B addresses changes in qualification requirements that may not require an amendment for most plans. IDPs must be amended for each item on the RAL, as applicable, to retain qualified tax status by the end of the second calendar year following the year the RAL is published.

2020 RAL

The IRS Notice 2020-83 announced two Part B items, which involve a) increasing 415(c) annual addition limits for difficulty of care payments[□] created under the SECURE Act (plans that are maintained by employers that have provided difficulty of care payments during plan years beginning after December 31, 2015, and before January 1, 2021, generally must be amended by December 31, 2022) and b) revisions to cooperative and small employer charity (CSEC) defined benefit plans made by section 3609 of the CARES Act (amendments are due by December 31, 2022).

2019 RAL

The IRS announced in Notice 2019-64 that there are two Part A items, which pertain to hardship withdrawals and cash balance/hybrid DB plans maintained pursuant to collective bargaining agreements ratified on or before November 13, 2015. The hardship provisions suspend employees[□] elective deferrals after obtaining a hardship distribution and now require a representation from an employee who requests a hardship distribution made on or after January 1, 2020. Cash balance/hybrid DB plans must be amended regarding market rate of return and other requirements by certain dates. There were no Part B items. The 2019 RAL due date is December 31, 2021.

2018 RAL AND 2017 RAL

Through IRS Notice 2018-91 in December 2018, there were no changes in qualification requirements on the 2018 RAL. The 2017 RAL (which was announced through IRS Notice 2017-72 in December 2017 and was due December 31, 2019) identifies several changes to the tax-qualification rules specific to cash balance/hybrid plans and defined benefit plans.

REGULATORY MATTERS

IRS OPERATIONAL COMPLIANCE LIST



On July 8, 2020, the IRS updated its [operational compliance list](#), where changes take effect during 2020. These changes include:

- ▶ Final regulations relating to hardship distributions (84 Fed Reg 49651).
- ▶ Extension of temporary relief for closed defined benefit pension plans (Notice 2019-49).
- ▶ Additional temporary nondiscrimination relief for closed defined benefit pension plans (Notice 2019- 60).
- ▶ Increase in 10 percent cap for automatic enrollment safe harbor after first plan year (SECURE Act, Section 102).
- ▶ Rules relating to election of safe harbor 401(k) status (SECURE Act, Section 103)
- ▶ Portability of lifetime income options (SECURE Act, Section 109).
- ▶ Penalty-free withdrawals from retirement plans for individuals in case of birth or adoption (SECURE Act, Section 113).
- ▶ Increase in age for required beginning date for mandatory distributions (SECURE Act, Section 114).
- ▶ Modification of nondiscrimination rules to protect older, longer service participants (SECURE Act, Section 205).
- ▶ Modification of required distribution rules for designated beneficiaries (SECURE Act, Section 401).
- ▶ Provisions relating to plan amendments (SECURE Act, Section 601).

The list also includes changes taking effect during 2016 through 2019.

REGULATORY MATTERS

INTERNAL REVENUE SERVICE (IRS)

IRS GUIDANCE ON QUALIFIED PLAN LOAN OFFSETS

In December 2020, the IRS issued final rules on qualified plan loan offsets²⁴(QPLOs) to address certain amendments under the Tax Cuts and Jobs Act (TCJA). Under the TCJA (which was enacted in 2017), QPLOs have an extended rollover period and are not required to be rolled over within the regular 60-day period. Instead, participants may roll over QPLO amount to an eligible retirement plan by the deadline (including extensions) for the participant's income tax return for the year in which the offset is treated as distributed from the tax-qualified source²⁵plan.

The final rules apply to all plan loan offsets (including QPLOs) made on or after January 1, 2021. They will first apply to 2021 Form 1099-Rs, which are filed with the IRS and provided to participants in 2022, but Form 1099-R filers may also apply the final rules to plan loan offset amounts treated as distributed on or after Aug 20, 2020.

BIPARTISAN BUDGET ACT OF 2018

Removes certain constraints on hardship withdrawals, including eliminating the requirement that a participant take a plan loan before applying for a hardship withdrawal; eliminating the six-month prohibition on participant contributions; allowing withdrawals to be taken from qualified non-elective contributions and qualified matching contributions. An amendment will be required to update plan documents for these provisions. For pre-approved plans, the deadline to amend is December 31, 2021 (as extended by [IRS Rev. Proc. 2020-9](#)). For all other plans (including individually designed plans), the deadline was December 31, 2018.

CONSOLIDATED APPROPRIATIONS ACT OF 2019 - DISASTER RELIEF SPECIAL RULES

The Consolidated Appropriations Act of 2019 allows easier access to retirement funds to recover from 2018 and 2019 California wildfires and other natural disasters. Participants may include qualified hurricane/wildfire distributions in income and can repay distributions to the plan over a three-year period. The special rules waive the 10% additional tax on certain early distributions; expand the availability of plan loans up to \$100,000; and extend the loan repayment period by one additional year. Sponsors have until the last day of the first plan year beginning on or after 2020 to amend their plans to provide either or both distribution options to participants (amendments must be retroactive).

UPDATED MORTALITY TABLES FOR REQUIRED MINIMUM DISTRIBUTIONS

In November 2020, the IRS finalized regulations updating the life expectancy and distribution period tables for calculating RMDs from tax-qualified retirement plans and IRAs. The updated tables add a year or two of life expectancy, which will decrease the size of RMDs. The final rule is effective for *distribution* calendar years beginning on or after January 1, 2022 (a *distribution* calendar year is the year to which the RMD relates, not the year in which the RMD is paid). It also includes transition relief for employees or spouses who die before 2022, but after RMDs have begun.



REGULATORY MATTERS

DEPARTMENT OF LABOR (DOL)



NEW GUIDANCE REGARDING MISSING PARTICIPANTS

In January 2021, the DOL issued best practices guidance to plan fiduciaries for locating missing or non-responsive plan participants and a Field Assistance Bulletin (FAB 2021-01) that discusses use of the PBGC missing participant program for terminating defined contribution plans. Plan fiduciary procedures to locate deferred vested missing participants has been an enforcement focus of the DOL in recent years.

DOL FIDUCIARY RULE

Following the courts vacating its rule expanding the definition of a fiduciary in 2018, the DOL introduced a proposed rule (Fiduciary Rule) and technical amendment in 2020 that would provide additional clarity whether advice providers are held to a fiduciary standard. The rule includes a new prohibited transaction class exemption for investment advice fiduciaries for work related to retirement plan assets. In addition, the technical amendment immediately reinstates both the 1975 five-part test to determine fiduciary status and [DOL Bulletin 96-1](#) concerning participant investment education.

The DOL rule aligns with the SEC's Regulation Best Interest (Reg BI), which sets a higher standard for broker-dealers, registered investment advisers and other advisers. Reg BI, which went into effect on June 30, 2020, bans brokers from putting their firms' interests before the needs of clients and requires them to disclose key facts about recommendations, exercise reasonable care when making decisions on behalf of clients, establish and enforce written policies to address conflicts of interest, and establish and enforce written policies to comply with the regulation.

The rule and the prohibited transaction exemption (PTE) was released December 18, 2020. The effective date was February 16, 2021.

DOL ISSUES FINAL PROXY VOTING RULE

In December 2020, the DOL issued a final rule regarding exercise of shareholder rights by plan fiduciaries. It establishes a regulatory framework for plan fiduciaries to follow when exercising shareholder rights, including proxy voting as well as the selection and monitoring of proxy advisory firms. The new framework set forth in the rule utilizes a principles-based approach.

REGULATORY MATTERS

PARTIAL PLAN TERMINATIONS

TEMPORARY PARTIAL PLAN TERMINATION RELIEF

Congress has enacted temporary COVID-related relief from partial plan terminations in the Consolidated Appropriations Act, 2021 (CAA21) (December 2020). The relief temporarily suspends partial plan termination treatment for a plan year that includes the period of March 13, 2020 through March 31, 2021, if the plan's active participant count at March 31, 2021 is at least 80 percent of the active participant count at March 13, 2020.

The determination as to whether a partial plan termination has occurred is based on the specific facts and circumstances of the plan. Generally, a significant reduction in the covered participant count of 20 percent or greater is indicative of a possible partial plan termination situation. In situations where there is a determination that a partial plan termination has occurred, the affected employees must become fully vested in their account balances, including all employer contributions.



ACCOUNTING MATTERS

ASU 2018-13, CHANGES TO THE DISCLOSURE REQUIREMENTS FOR FAIR VALUE MEASUREMENT

The ASU was issued as part of the FASB's disclosure framework project, which has an objective and primary focus to improve the effectiveness of disclosures in the notes to financial statements.

It amends the disclosure requirements for recurring and nonrecurring fair value measurements by eliminating, amending and adding certain disclosure requirements.

The eliminated disclosure requirements were: the amount of and reasons for transfers between Level 1 and Level 2 of the fair value hierarchy; policy for timing of transfers between levels of the fair value hierarchy; valuation processes for Level 3 fair value measurements and for nonpublic entities, the changes in unrealized gains and losses for the period included in earnings for recurring Level 3 fair value measurements held at the end of the reporting period.

In lieu of a rollforward for Level 3 fair value measurements, a nonpublic entity is now required to disclose transfers into and out of Level 3 of the fair value hierarchy and purchases and issues of Level 3 assets and liabilities. For investments in certain entities that calculate net asset value, or NAV, an entity is required to disclose the timing of liquidation of an investee's assets and the date when restrictions from redemption might lapse only if the investee has communicated the timing to the reporting entity or announced the timing publicly. If the timing is unknown, the reporting entity shall disclose that fact. The amendments clarify that the measurement uncertainty disclosure is to communicate information about the uncertainty in measurement as of the reporting date.

There were two new disclosure requirements added to Topic 820 for nonpublic entities, one of which impacts 11-K issuers. The ASU requires that the entity disclose additional supporting information used to derive significant unobservable inputs for level 3, such as the range and weighted average of the significant unobservable inputs.

For certain unobservable inputs, an entity may disclose other quantitative information (such as the median or arithmetic average) instead of the weighted average if the entity determines that other quantitative information would be a more reasonable and rational method to reflect the distribution of unobservable inputs used to develop Level 3 fair value measurements.

The ASU is effective for reporting periods beginning after December 15, 2019. Early adoption was permitted. An entity may elect to early adopt all disclosure requirements or only the eliminated or modified disclosure requirements (while delaying adoption of the additional disclosures until their effective date).



ACCOUNTING MATTERS

DELAYED EFFECTIVE DATE FOR NEW LEASE ACCOUNTING STANDARD

In October 2019, the Financial Accounting Standards Board (FASB) approved the delay of the effective date of its standard on accounting for leases (Accounting Standards Update No. 2016-02, *Leases* (Topic 842)) for private companies and certain other entities. In response to the COVID-19 pandemic, the FASB has deferred ASC 842 for private companies and certain not-for-profit entities. It will now be effective for fiscal periods beginning after December 15, 2021, and interim periods within fiscal years beginning after December 15, 2022. (For public not-for-profit entities, the leasing standard was effective for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years.)

While generally not applicable to EBPs, the lease standard may impact multiemployer plans that lease property and equipment that are not considered plan investments (e.g., office space, office equipment or training facility space).



AUDITING MATTERS: IMPLEMENTATION OF NEW AUDITING STANDARDS

STATEMENTS ON AUDITING STANDARDS 134 ~~141~~



The Auditing Standards Board (ASB) of the AICPA issued the following Statements on Auditing Standards (SAS) that are applicable to EBP engagements:

- ▶ SAS 134, *Auditor Reporting and Amendments, Including Amendments Addressing Disclosures in the Audit of Financial Statements* (SAS 134) ~~it~~ significantly changes the form and content of the auditor's report and also addresses the auditor's responsibility to form an opinion on the financial statements.
- ▶ SAS 135, *Omnibus Statement on Auditing Standards - 2019* (SAS 135) ~~it~~ is intended to more closely align certain AICPA standards with the Public Company Accounting Oversight Board's (PCAOB) standards.
- ▶ SAS 136, *Forming an Opinion and Reporting on Financial Statements of Employee Benefit Plans Subject to ERISA* ~~is~~ applicable to EBPs and prescribes certain new performance requirements for an audit of financial statements of employee benefit plans subject to the Employee Retirement Income Security Act of 1974 (ERISA) and changes the form and content of the related auditor's report.
- ▶ SAS 137, *The Auditors Responsibilities Relating to Other Information Included in Annual Reports* benefits users of the auditor's report by providing transparency with respect to the auditor's responsibilities for other information included in an annual report when the auditor has obtained all of the other information at the date of the auditor's report.

SAS 138, *Amendments to the Description of the Concept of Materiality* ~~this~~ SAS, along with SSAE No. 20, align the materiality concepts discussed in AICPA Professional Standards with the description of materiality used by the U.S. judicial system, the auditing standards of the PCAOB, the U.S. Securities and Exchange Commission (SEC), and the Financial Accounting Standards Board (FASB).

SAS 139, *Amendments to AU-C Sections 800, 805, and 810 to Incorporate Auditor Reporting Changes From SAS No. 134* ~~it~~ aligns the AU-C 800 series with the relevant auditor reporting standards in SAS 134, thereby updating the form and content of auditor's reports addressed in the AU-C 800 series to be more consistent with the standards of the International Auditing and Assurance Standards Board and recent updates to PCAOB standards.

SAS 140, *Amendments to AU-C Sections 725, 730, 930, 935, and 940 to Incorporate Auditor Reporting Changes From SAS Nos. 134 and 137* ~~it~~ also includes conforming changes to other AU-C sections.

SAS 141, *Amendment to the Effective Dates of SAS Nos. 134~~40~~* ~~the~~ ASB issued this SAS to change the effective dates of SAS 134 - 140 from December 15, 2020, to December 15, 2021, in order to provide more time for implementation due to the COVID-19 pandemic. Since some firms may have already been in the process of implementing these standards, and to support the objective of increasing audit quality, SAS 141 also lifted the prohibition against early implementation.

SAS 134 is interrelated with SAS 136~~40~~ since the ASB amended the auditor reporting model adopted in SAS 134 with the issuance of the subsequent SASs. The effective dates were aligned so that these would be implemented as a suite and the ASB recommended that these SASs be implemented concurrently.

REGULATORY MATTERS

SECURE ACT IMPACT

TRACKING HOURS FOR PART-TIME EMPLOYEES FOR 401(k) PLANS

Tax-qualified retirement plans generally must cover all employees who work at least 1,000 hours per year and have attained age 21. However, for plan years beginning after December 31, 2023, the SECURE Act will require 401(k) plans (other than collectively bargained plans) to also cover employees who have worked at least 500 hours for three consecutive years (measured for plan years starting after December 31, 2020). Currently, this appears to include seasonal employees. No employer contributions (not even top-heavy minimum contributions) are required until the employee satisfies the plan's normal eligibility requirements. Further guidance will be needed regarding a special vesting rule that applies to these individuals to provide vesting credit at 500 hours of service.

Employers may continue to impose the age 21 eligibility requirement. As noted above, employers are not required to contribute under this new rule before 2024. However, for plan years starting after December 31, 2020, employers should begin tracking hours worked to determine the future eligibility of such employees to participate in the 401(k) plan. By tracking the hours as incurred, employers will avoid the need to recreate records in the future for the three-year consecutive period (e.g., 2021-2024). This change does not apply to 403(b) plans due to the universal availability rule that 403(b) plans must satisfy.

IRS GUIDANCE ON SECURE ACT CHANGES TO SAFE HARBOR PLANS

In December 2020, the IRS issued Notice 2020-86, which provides (in a question and answer format) initial guidance regarding impact of the SECURE Act to 401(k) and 403(b) safe harbor plans. The SECURE Act included the following safe harbor plan changes:

- Increased the maximum automatic elective deferral under an automatic enrollment safe harbor plan from 10% to 15%.
- Eliminated certain safe harbor notice requirements for plans that provide safe harbor nonelective contributions.
- Added new provisions for the retroactive adoption of safe harbor status for plans that provide safe harbor nonelective contributions.



REGULATORY MATTERS



DEFINED CONTRIBUTION PLANS THIRD CYCLE FILINGS

The third six-year remedial amendment cycle for pre-approved defined contribution (DC) plans opened August 1, 2020 and runs through July 31, 2022. [IRS Announcement 2020-7](#) indicates that the third cycle includes Employee Stock Ownership Plans (ESOPs) for the first time.

DOL ISSUES INTERIM FINAL RULE ON LIFETIME INCOME DISCLOSURES

In response to the SECURE Act, the DOL released an interim final rule in August 2020 that includes lifetime income illustrations, using prescribed assumptions. The interim final rule applies to DC plans and requires the plans to provide two lifetime income illustrations (single life annuity and qualified joint and survivor annuity) included on the benefit statements provided to participants at least annually starting in 2021. The DOL has indicated that these illustrations are intended to help employees better understand how their account balance translates to monthly retirement income and prepare for retirement.



Working with BDO



BDO's ERISA Services Practice

The power of industry experience is perspective - perspective we use to help our clients leverage their own capabilities and resources. BDO combines comprehensive audit, tax, and advisory offerings to provide services tailored to the unique needs of our employee benefit plan sponsor clients.

Whether performing plan audits subject to the financial reporting requirements of the Employee Retirement Income Security Act of 1974 (ERISA), advising on regulatory and reporting requirements, or providing consulting services across the entire ERISA spectrum, we understand the fiduciary responsibilities and risks that plan sponsors face. We don't just deliver employee benefit plan compliance services, our solutions-oriented team becomes each client's trusted ERISA advisor.

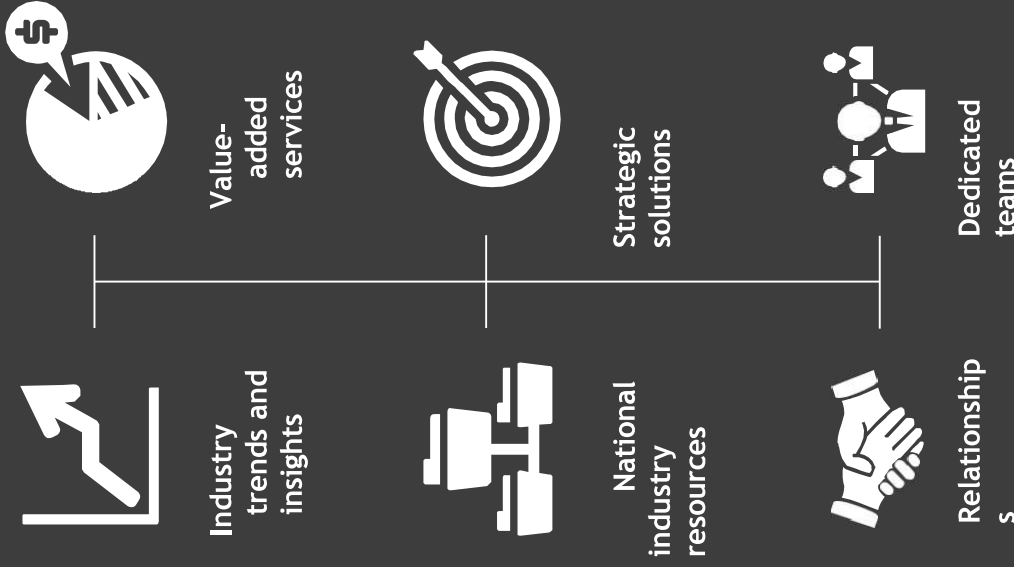
BDO is distinct among global CPA firms in focusing on employee benefit plan auditing, and having partners, directors, and managers who focus solely in this area. Our teams offer value-added advice on all matters affecting employee benefit plans, including business, operational, regulatory, accounting, and auditing concerns.

OUR DEDICATED STAFF HAVE SIGNIFICANT EXPERIENCE WITH VIRTUALLY ALL PLAN TYPES AND FILING REQUIREMENTS:

- ▶ Defined contribution retirement plans (401(k) and 403(b) arrangements, profit-sharing plans, stock bonus and ESOP)
- ▶ Defined benefit pension plans (pension equity plans, cash balance plans)
- ▶ SEC 11-K Filings
- ▶ ERISA Non-Section 103(a)(3)(C) (formerly referred to as full-scope) audits
- ▶ ERISA Section 103(a)(3)(C) (formerly referred to as limited-scope) audits
- ▶ Union-represented plans
- ▶ Multiemployer plans
- ▶ Multiple employer plans
- ▶ Health & Welfare plans (defined benefit or defined contribution)
- ▶ Master Trusts
- ▶ Form 5500 and Form 990 Filings

THE POWER OF EXPERIENCE

Our team of dedicated ERISA professionals combines BDO's comprehensive audit and tax offerings to provide services tailored to our clients' unique needs.



BDO's ERISA Center of Excellence

Backed by the resources of an extensive network, BDO's ERISA Center of Excellence provides meaningful insights and technical experience to those charged with governance.

Our dedicated ERISA professionals are available to provide services throughout the firm ensuring that every client receives high-quality service designed to help them achieve their unique goals. Throughout the ERISA Center of Excellence, we bring you insights to help your team understand nuances around regulations, best practices, cybersecurity, and more:

- ▶ [Quarterly ERISA Roundup](#) publication so you don't miss a beat
- ▶ [ERISA Requirements Calendar](#) - deadlines and other important dates to ensure compliance for plans in 2021
- ▶ [Benefits Outlook for 2021: Telehealth, Mental Health, Digital Communications](#) □ considerations for benefits offerings in the year ahead
- ▶ [Subscribe here](#) to receive email updates

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At BDO, we go beyond the traditional EBP audit and tax services to incorporate our actuaries, third party administrators, and compensation and benefits professionals into a comprehensive team.

We are proud to offer:

- ▶ Plan consulting
- ▶ services Actuarial
- ▶ services
- ▶ Assistance with IRS and DOL audits
- ▶ Review of procedures and controls for in-house and outsourced services

Comprehensive plan compliance reviews preparation



As we continue to navigate a new working environment, BDO's ERISA Center of Excellence is committed to highlighting significant regulations and deadlines.

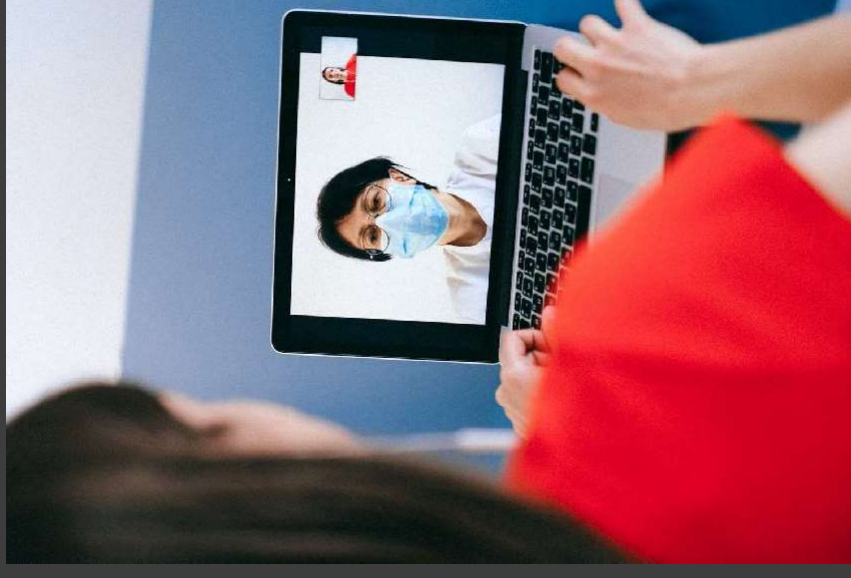
With immense changes to our personal and work lives, it is challenging to stay abreast of changes impacting your plans. You can always find up-to-date industry insights at www.bdo.com/erisa. □

□ Beth Garner, National Assurance Partner

BDO's ERISA Center of Excellence Thought Leadership

BENEFITS OUTLOOK FOR 2021: TELEHEALTH, MENTAL HEALTH, DIGITAL COMMUNICATIONS

The events of the past year have impacted not only how and where people work, but also which employee benefits are most valued by employees. These shifts have driven human resource departments to re-examine traditional benefits while tailoring benefit offerings to respond to the so-called new normal. In our [Benefits Outlook for 2021: Telehealth, Mental Health, Digital Communications](#), we discuss important employer benefits considerations for the new year, including integration of newer offerings and enhanced benefits communication to employees.



Click [here](#) to read this alert

BDO's ERISA Center of Excellence

Thought Leadership

THE Q4 2020 *ERISA ROUNDUP* INCLUDES THE FOLLOWING ARTICLES:

- ▶ 2021 Deadlines and Important Dates for Plan Sponsors
- ▶ Benefits Outlook for 2021: Telehealth, Mental Health, Digital
- ▶ Communications Tech Re-strategizes Amid COVID-19 Complications
- ▶ Why ESOPS Are Becoming More Popular Among Architecture and Engineering
- ▶ Firms Documenting Late 401(k) Plan Deposits Due to COVID-19
- ▶ 2021 Cost-of Living Adjustments for Qualified Retirement
- ▶ Plans PBGC Revises Timeline to Calculate Premiums



Click [here](#) to read this publication

BDO Talks ERISA Podcast Series

BDO's ERISA Center of Excellence is excited to announce our new series, BDO Talks ERISA, a podcast series for plan sponsors and those charged with plan governance. Each episode features a topical discussion with our Employee Benefit Plan Audit leaders and subject matter experts on a variety of specialized issues. Upcoming episodes will focus on SAS 136, managing employees, and more.



BDO Talks ERISA episodes will be published on iTunes and Spotify starting in early 2021.

Want to stay up to date with the BDO Talks ERISA podcast? [Sign up](#) to receive our ERISA Center of Excellence Insights and you'll receive an email as new episodes are released.

Efficient Service Methodology

BDO Advantage

At BDO, we constantly refine our audit approach. We incorporate technologies into everything we do, using intelligent IT-supported audit techniques and comprehensive training.

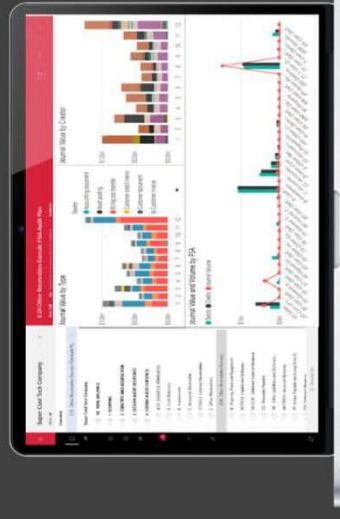
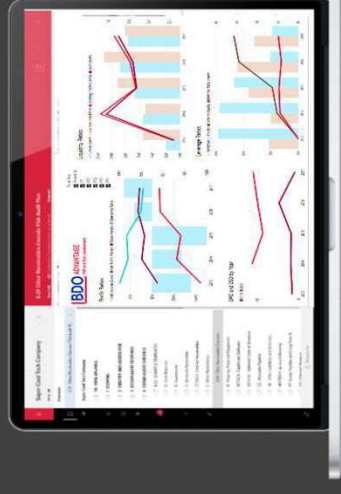
BDO Advantage is our global initiative enabling greater analysis via audit data analytics (ADA) within the audit through use of data visualization, data correlation, data comparison, and other shared techniques.

These techniques can be used as part of risk assessment, audit evidence gathering, provision of greater insights, and support more efficient and effective audit strategies.

REIMAGINING ANALYTICS

Modern technology enables ADA to improve the risk assessment process, the depth of substantive procedures, and the focus of tests of controls, further increasing quality. We use modern analytical tools to fully analyze large quantities of data to more effectively focus on items with indicators of risk.

By integrating data analytics into our audit, we are using technology to deliver a better-quality audit by focusing our efforts on the right areas of your business, those areas with the largest risk; using less time on reviewing repetitive tasks and more time on parts of the audit that require our auditors' professional judgment.



BDO USA, LLP is a professional services firm providing assurance, tax, and advisory services to a wide range of publicly traded and privately held companies. For more than 100 years, BDO has provided quality service through the active involvement of experienced and committed professionals. The firm serves clients through more than 70 offices and over 750 independent alliance firm locations nationwide. As an independent Member Firm of BDO International Limited, BDO serves multi-national clients through a global network of more than 95,000 people working out of more than 1,700 offices across 164 countries and territories.

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The Miller Group 401(k) Plan

Schedule H, Line 4i - Schedule of Assets (Held at End of Year)

EIN: 74-2376364

Plan No.: 001

December 31, 2021

(a)	(b)	(c)	(d)	(e)
Identity of Issuer, Borrower, Lessor, or Similar Party	Description of Investment, Including Maturity Date, Rate of Interest, Collateral, Par, or Maturity Value	Cost	Current Value	
Mutual Funds				
BlackRock	BlackRock LifePath® Index 2035 K	**	\$ 769,584	
BlackRock	BlackRock LifePath® Index 2045 K	**	651,737	
BlackRock	BlackRock LifePath® Index 2030 K	**	638,587	
BlackRock	BlackRock LifePath® Index Retire K	**	570,774	
T. Rowe Price	T. Rowe Price Blue Chip Growth	**	541,989	
BlackRock	BlackRock LifePath® Index 2040 K	**	451,328	
BlackRock	BlackRock LifePath® Index 2025 K	**	437,305	
Vanguard	Vanguard Value Index Adm	**	393,144	
Schwab Funds	Schwab® S&P 500 Index	**	339,050	
BlackRock	BlackRock LifePath® Index 2050 K	**	217,720	
Janus Henderson	Janus Henderson Triton N	**	203,266	
Virtus	Virtus KAR Small-Cap Growth R6	**	131,501	
BlackRock	BlackRock LifePath® Index 2055 K	**	77,316	
American Funds	American Funds New Perspective R6	**	54,962	
MFS	MFS Mid Cap Growth R6	**	53,175	
Invesco	Invesco S&P 500® Equal Weight ETF	**	51,867	
BlackRock	BlackRock LifePath® Index 2060 K	**	20,560	
Vanguard	Vanguard Interim-Term Bond Index Adm	**	11,955	
PGIM Investments	PGIM Total Return Bond R6	**	8,309	
Vanguard	Vanguard Information Technology Idx Adm	**	6,763	
Vanguard	Vanguard Total Stock Mkt Idx Adm	**	6,407	
Vanguard	Vanguard Mid Cap Index Admiral	**	4,364	
* Voya	Voya Intermediate Bond R6	**	3,680	
Vanguard	Vanguard Developed Markets Index Admiral	**	2,641	
Vanguard	Vanguard Small Cap Index Adm	**	2,499	
Vanguard	Vanguard Small Cap Growth Index Admiral	**	1,340	
American Century	American Century Emerging Markets R6	**	330	
Dimensional Fund Advisors	DFA US Targeted Value I	**	148	
MFS	MFS Intl Diversification R6	**	146	
BlackRock	BlackRock Health Sciences Opps K	**	145	
* Voya	Voya Government Money Market Fund	**	20	
Total Mutual Funds				5,652,612
Fixed Income Fund				
* Voya	Voya Fixed Account	**		902,449
Total Investments				6,555,061
* Participant Loans	Interest rates range from 4.50% to 6.75%	-		56,165
Total				\$ 6,611,226

* A party-in-interest, as defined by ERISA.

** Cost is not required since all investments are participant-directed.