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

2025

This Form is Open to Public Inspection

Part I Annual Report Identification Information

For calendar plan year 2025 or fiscal plan year beginning 01/01/2025 and ending 12/31/2025

A This return/report is for:
- [ ] a multiemployer plan
- [ ] a multiple-employer plan (Filers checking this box must provide participating employer information in accordance with the form instructions.)
- [X] 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:
- [X] 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
EMBRAER AIRCRAFT HOLDING, INC. 401(K) RETIREMENT PLAN

1b Three-digit plan number (PN) ▶ 001

1c Effective date of plan 01/01/1981

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)
EMBRAER AIRCRAFT HOLDING, INC.

276 SW 34TH STREET
FT. LAUDERDALE, FL 33315

2b Employer Identification Number (EIN) 65-1156742

2c Plan Sponsor's telephone number 954-359-3700

2d Business code (see instructions) 811210

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.	10/14/2026	STEVE MOLDREM
	Signature of plan administrator	Date	Enter name of individual signing as plan administrator
SIGN HERE	Filed with authorized/valid electronic signature.	10/14/2026	STEVE MOLDREM
	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

3a Plan administrator's name and address [X] 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**	2792
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)**	2217
a(2)	Total number of active participants at the end of the plan year	**6a(2)**	2489
b	Retired or separated participants receiving benefits	**6b**	46
c	Other retired or separated participants entitled to future benefits	**6c**	586
d	Subtotal. Add lines **6a(2)**, **6b**, and **6c**.	**6d**	3121
e	Deceased participants whose beneficiaries are receiving or are entitled to receive benefits.	**6e**	8
f	Total. Add lines **6d** and **6e**.	**6f**	3129
g(1)	Number of participants with account balances as of the beginning of the plan year (only defined contribution plans complete this item)	**6g(1)**	2662
g(2)	Number of participants with account balances as of the end of the plan year (only defined contribution plans complete this item)	**6g(2)**	3001
h	Number of participants who terminated employment during the plan year with accrued benefits that were less than 100% vested.	**6h**	119
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 Characteristic Codes in the instructions:

2E 2F 2G 2J 2K 2S 2T 3H

b If the plan provides welfare benefits, enter the applicable welfare feature codes from the List of Plan Characteristic Codes in the instructions:

9a Plan funding arrangement (check all that apply)		**9b** Plan benefit arrangement (check all that apply)	
(1) [ ]	Insurance	**(1)** [ ]	Insurance
(2) [ ]	Code section 412(e)(3) insurance contracts	**(2)** [ ]	Code section 412(e)(3) insurance contracts
(3) [X]	Trust	**(3)** [X]	Trust
(4) [ ]	General assets of the sponsor	**(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)** [X] **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
- **(4)** [ ] **DCG** (Individual Plan Information) – Number Attached _____
- **(5)** [ ] **MEP** (Multiple-Employer Retirement Plan Information)

b General Schedules

- **(1)** [X] **H** (Financial Information)
- **(2)** [ ] **I** (Financial Information – Small Plan)
- **(3)** [ ] **A** (Insurance Information) – Number Attached _____
- **(4)** [X] **C** (Service Provider Information)
- **(5)** [X] **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 2025 Form M-1 annual report. If the plan was not required to file the 2025 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 C (Form 5500)	Service Provider Information	OMB No. 1210-0110
Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	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.**	**2025** **This Form is Open to Public Inspection.**

For calendar plan year 2025 or fiscal plan year beginning 01/01/2025 and ending 12/31/2025

A Name of plan
EMBRAER AIRCRAFT HOLDING, INC. 401(K) RETIREMENT PLAN

B Three-digit plan number (PN) ▶ 001

C Plan sponsor's name as shown on line 2a of Form 5500
EMBRAER AIRCRAFT HOLDING, INC.

D Employer Identification Number (EIN)
65-1156742

Part I Service Provider Information (see instructions)

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

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

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)

WINSTON & STRAWN LLP

36-1975990

(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?
50 99	CONSULTANT	60486	Yes [ ] No [X]	Yes [ ] No [ ]		Yes [ ] No [ ]

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

MERRILL LYNCH, PIERCE, FENNER AND S

13-5674085

(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?
15 52 59 60 62 63 72	RECORDKEEPER	56096	Yes [X] No [ ]	Yes [X] No [ ]	0	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
(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.	

(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

(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

(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

2025

This Form is Open to Public Inspection.

For calendar plan year 2025 or fiscal plan year beginning 01/01/2025 and ending 12/31/2025

A Name of plan
EMBRAER AIRCRAFT HOLDING, INC. 401(K) RETIREMENT PLAN

B Three-digit plan number (PN) ▶ 001

C Plan or DFE sponsor's name as shown on line 2a of Form 5500
EMBRAER AIRCRAFT HOLDING, INC.

D Employer Identification Number (EIN)
65-1156742

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: FEDERATED HERMES CAP PRES CLASS ISP

b Name of sponsor of entity listed in (a): FEDERATED INVESTORS TRUST COMPANY

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)
22-2712853-001	C	0

a Name of MTIA, CCT, PSA, or 103-12 IE: FEDERATED HERMES CAP PRES CLASS R6

b Name of sponsor of entity listed in (a): FEDERATED INVESTORS TRUST COMPANY

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)
22-2712853-001	C	8453250

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)

Part II **Information on Participating Plans (to be completed by DFEs, other than DCGs)**
(Complete as many entries as needed to report all participating plans. DCGs must report each participating plan using Schedule DCG.)

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

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

2025

This Form is Open to Public Inspection

For calendar plan year 2025 or fiscal plan year beginning 01/01/2025 and ending 12/31/2025

A Name of plan
EMBRAER AIRCRAFT HOLDING, INC. 401(K) RETIREMENT PLAN

B Three-digit plan number (PN) ▶ 001

C Plan sponsor's name as shown on line 2a of Form 5500
EMBRAER AIRCRAFT HOLDING, INC.

D Employer Identification Number (EIN)
65-1156742

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	1645	2600
b Receivables (less allowance for doubtful accounts):			
(1) Employer contributions	1b(1)	222047	273211
(2) Participant contributions	1b(2)		
(3) Other	1b(3)		
c General investments:			
(1) Interest-bearing cash (include money market accounts & certificates of deposit)	1c(1)	-6382	96144
(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)	5466132	6480826
(9) Value of interest in common/collective trusts	1c(9)	9104245	8453250
(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)	189775483	221550477
(14) Value of funds held in insurance company general account (unallocated contracts)	1c(14)		
(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)		
1e Buildings and other property used in plan operation	1e		
1f Total assets (add all amounts in lines 1a through 1e)	1f	204563170	236856508
Liabilities			
1g Benefit claims payable	1g		
1h Operating payables	1h		
1i Acquisition indebtedness	1i		
1j Other liabilities	1j		
1k Total liabilities (add all amounts in lines 1g through1j)	1k	0	0
Net Assets			
1l Net assets (subtract line 1k from line 1f)	1l	204563170	236856508

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.

Income		(a) Amount	(b) Total
a Contributions:			
(1) Received or receivable in cash from: **(A)** Employers	2a(1)(A)	10967297	
(B) Participants	2a(1)(B)	14610505	
(C) Others (including rollovers)	2a(1)(C)	1687357	
(2) Noncash contributions	2a(2)		
(3) Total contributions. Add lines **2a(1)(A), (B), (C),** and line **2a(2)**	2a(3)		27265159
b Earnings on investments:			
(1) Interest:			
(A) Interest-bearing cash (including money market accounts and certificates of deposit)	2b(1)(A)	2049	
(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)	504417	
(F) Other	2b(1)(F)		
(G) Total interest. Add lines **2b(1)(A)** through **(F)**	2b(1)(G)		506466
(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)	12421675	
(D) Total dividends. Add lines **2b(2)(A)**, **(B)**, and **(C)**	2b(2)(D)		12421675
(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)		258070
(7) Net investment gain (loss) from pooled separate accounts	2b(7)		
(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)		18527088
c Other income	2c		173842
d Total income. Add all **income** amounts in column (b) and enter total	2d		59152300
Expenses			
e Benefit payment and payments to provide benefits:			
(1) Directly to participants or beneficiaries, including direct rollovers	2e(1)	26601395	
(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)		26601395
f Corrective distributions (see instructions)	2f		
g Certain deemed distributions of participant loans (see instructions)	2g		3773
h Interest expense	2h		
i Administrative expenses:			
(1) Salaries and allowances	2i(1)		
(2) Contract administrator fees	2i(2)		
(3) Recordkeeping fees	2i(3)	56096	
(4) IQPA audit fees	2i(4)		
(5) Investment advisory and investment management fees	2i(5)	44596	
(6) Bank or trust company trustee/custodial fees	2i(6)		
(7) Actuarial fees	2i(7)		
(8) Legal fees	2i(8)		
(9) Valuation/appraisal fees	2i(9)		
(10) Other trustee fees and expenses	2i(10)		
(11) Other expenses	2i(11)	153102	
(12) Total administrative expenses. Add lines **2i(1)** through **(11)**	2i(12)		253794
j Total expenses. Add all **expense** amounts in column (b) and enter total	2j		26858962
Net Income and Reconciliation			
k Net income (loss). Subtract line **2j** from line **2d**	2k		32293338
l Transfers of assets:			
(1) To this plan	2l(1)		0
(2) From this plan	2l(2)		0

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) [X] 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) [X] 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: CBIZ CPAS P.C. **(2)** EIN: 43-1947695

d The opinion of an independent qualified public accountant is **not attached** as part of Schedule H because:

(1) [ ] This form is filed for a CCT, PSA, DCG 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. DCGs do not complete lines 4e, 4f, 4k, 4l, and 5, and DCGs generally complete the rest of Part IV collectively for all plans in the DCG, except as otherwise provided (see instructions).

During the plan year:

		Yes	No	Amount
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.)	**4a**		X	
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?	**4e**	X		3000000
f Did the plan have a loss, whether or not reimbursed by the plan's fidelity bond, that was caused by fraud or dishonesty?	**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.)	**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 [X] 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

2025

This Form is Open to Public Inspection.

For calendar plan year 2025 or fiscal plan year beginning 01/01/2025 and ending 12/31/2025

A Name of plan
EMBRAER AIRCRAFT HOLDING, INC. 401(K) RETIREMENT PLAN

B Three-digit plan number (PN) ▶ 001

C Plan sponsor's name as shown on line 2a of Form 5500
EMBRAER AIRCRAFT HOLDING, INC.

D Employer Identification Number (EIN)
65-1156742

Part I Distributions

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 | 0

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): 94-1687665

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.)

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

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

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.

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

Part V Additional Information for Multiemployer Defined Benefit Pension Plans

13 Enter the following information for each employer that (1) contributed more than 5% of total contributions to the plan during the plan year or (2) was one of the top-ten highest contributors (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) and (b):

a Enter the percentage of plan assets held as:
Public Equity: _____% Private Equity: _____% Investment-Grade Debt and Interest Rate Hedging Assets: _____%
High-Yield Debt: _____% Real Assets: _____% Cash or Cash Equivalents: _____% Other: _____%

b Provide the average duration of the Investment-Grade Debt and Interest Rate Hedging Assets:
☐ 0-5 years ☐ 5-10 years ☐ 10-15 years ☐ 15 years or more

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._____

Part VII IRS Compliance Questions

21a Does the plan satisfy the coverage and nondiscrimination tests of Code sections 410(b) and 401(a)(4) by combining this plan with any other plans under the permissive aggregation rules? ☐ Yes ☒ No

21b If this is a Code section 401(k) plan, check all boxes that apply to indicate how the plan is intended to satisfy the nondiscrimination requirements for employee deferrals and employer matching contributions (as applicable) under Code sections 401(k)(3) and 401(m)(2).

☐ Design-based safe harbor method

☐ "Prior year" ADP test

☒ "Current year" ADP test

☐ N/A

22 If the plan sponsor is an adopter of a pre-approved plan that received a favorable IRS Opinion Letter, enter the date of the Opinion Letter ___/___/_____ (MM/DD/YYYY) and the Opinion Letter serial number_____.

CBIZ CPAs

EMBRAER AIRCRAFT HOLDING, INC.
401(k) RETIREMENT PLAN

FINANCIAL STATEMENTS

Years Ended December 31, 2025 and 2024

CBIZ CPAs P.C.

2255 Glades Road
Suite #321A
Boca Raton, FL 33431

P: 561.994.5050

INDEPENDENT AUDITOR'S REPORT

To the Retirement Committee and Participants of the
Embraer Aircraft Holding, Inc. 401(k) Retirement Plan

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

We have performed the audits of the financial statements of the Embraer Aircraft Holding, Inc. 401(k) Retirement 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) ("ERISA Section 103(a)(3)(C) audit"). The financial statements comprise the statements of net assets available for benefits as of December 31, 2025 and 2024, the related statements of changes in net assets available for benefits for the years then ended, and the related notes to the financial statements.

Management, having determined it is permissible in the circumstances, has elected to have the audits of the Plan's 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 Rules and Regulations for Reporting and Disclosure under ERISA. As permitted by ERISA Section 103(a)(3)(C), our audits 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, provided that the statements or information regarding assets so held are prepared and certified by the bank or similar institution or insurance carrier in accordance with 29 CFR 2520.103-5 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA ("qualified institution").

Management has obtained certifications from a qualified institution as of December 31, 2025 and 2024 and for the years then ended, stating that the certified investment information, as described in Note 3 to the financial statements, is complete and accurate.

Opinion

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

- The amounts and disclosures in the accompanying 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.
- The information in the accompanying financial statements related to assets held by and certified by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Basis for Opinion

We conducted our audits 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 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 audits. 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 accounting principles generally accepted in the United States of America, 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 also responsible for maintaining a current plan instrument, including all plan amendments, 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 of the Financial Statements

Except as described in the Scope and Nature of the ERISA Section 103(a)(3)(C) Audit section of our report, our objectives are to obtain reasonable assurance about whether the 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 these 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 audits did not extend to the certified investment information, except for obtaining and reading the certifications, comparing the certified investment 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.

Accordingly, the objective of an 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 accounting principles generally accepted in the United States of America.

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 audit.

Other Matter - Supplemental Schedule Required by ERISA

The supplemental schedule of assets (held at end of year) as of December 31, 2025, is presented for purposes of additional analysis and is not a required part of the financial statements but is supplementary information required by the Department of Labor'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 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 financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and 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 Department of Labor'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 Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA.
- The information in the supplemental schedule related to assets held by and certified by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

CBIZ CPAs P.C.

Boca Raton, Florida
October 13, 2026

EMBRAER AIRCRAFT HOLDING, INC. 401(k) RETIREMENT PLAN

STATEMENTS OF NET ASSETS AVAILABLE FOR BENEFITS

December 31, 2025 and 2024

	2025	2024
ASSETS		
Investments at fair value:		
Mutual funds	$ 221,550,477	$ 189,775,483
Common/collective trust	8,453,250	9,104,245
Money market fund	96,144	-
	230,099,871	198,879,728
Cash and other	2,600	1,645
Receivables:		
Employer contributions	273,211	222,047
Notes receivable from participants	6,480,826	5,466,132
	6,754,037	5,688,179
TOTAL ASSETS	236,856,508	204,569,552
LIABILITY		
Money market fund overdraft	-	6,382
NET ASSETS AVAILABLE FOR BENEFITS	$ 236,856,508	$ 204,563,170

See Notes to Financial Statements

EMBRAER AIRCRAFT HOLDING, INC. 401(k) RETIREMENT PLAN

STATEMENTS OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS

Years Ended December 31, 2025 and 2024

	2025	2024
ADDITIONS		
Investment and other income:		
Net appreciation in fair value of investments	$ 18,785,158	$ 12,037,777
Dividends and interest	12,423,724	11,202,665
Other income	173,842	158,178
	31,382,724	23,398,620
Interest income on notes receivable from participants	504,417	418,121
Contributions:		
Employer	10,967,297	9,744,109
Participants	14,610,505	13,053,309
Rollover	1,687,357	1,423,286
	27,265,159	24,220,704
TOTAL ADDITIONS	59,152,300	48,037,445
DEDUCTIONS		
Benefits paid to participants	26,605,168	20,983,610
Administrative expenses	253,794	300,812
TOTAL DEDUCTIONS	26,858,962	21,284,422
NET INCREASE	32,293,338	26,753,023
NET ASSETS AVAILABLE FOR BENEFITS		
Beginning of year	204,563,170	177,810,147
End of year	$ 236,856,508	$ 204,563,170

See Notes to Financial Statements

(1) Description of plan

The following description of the Embraer Aircraft Holding, Inc. (the "Company") 401(k) Retirement Plan (the "Plan") provides only general information. Participants should refer to the plan document or summary plan description, both of which are available from the plan administrator, for a more complete description of the Plan's provisions.

General - The Plan is a defined contribution plan sponsored by the Company for the benefit of employees of the Company and its affiliates and subsidiaries who are eighteen years of age or older and are not excluded by certain provisions as disclosed in the plan document. The Plan is subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"). The Company's Board of Directors has established a Retirement Committee (the "Committee") to serve as the plan administrator and as the named fiduciary for the Plan. The Committee has overall responsibility for the operation and administration of the Plan, including determining the appropriateness of the Plan's investment offerings and monitoring investment performance.

Plan amendments - Effective January 1, 2024, the Plan was amended to allow part-time and seasonal employees who complete 500 hours of service in 3 consecutive 12-month periods to participate in the Plan. Additionally, effective January 1, 2024, employees who are classified as "long-term, part-time" as defined in the plan document are not eligible for employer matching contributions.

Effective January 1, 2025, the Plan was amended to allow employees who are classified as "long-term, part-time" who complete 500 hours of service in 2 consecutive 12-month periods to participate in the Plan.

Contributions - Participants may elect to defer up to 100% of their annual pretax compensation, as defined in the plan document, and/or make Roth 401(k) deferrals, without exceeding the maximum annual amount allowed by the Internal Revenue Code (the "Code"). Participants are automatically enrolled in the Plan. Automatically enrolled participants have their deferral rate set at 3% of their annual pretax compensation, unless they make an alternative election, or elect not to contribute to the Plan. Subject to the approval of the plan administrator, participants may also contribute amounts representing distributions from other qualified defined benefit or contribution plans, or from individual retirement accounts. Additionally, participants age 50 or older, who are making contributions to the Plan, are allowed to make catch-up contributions, as defined in the plan document. Participants direct the investment of all contributions into various investment options offered by the Plan.

Under the provisions of the plan document, the Company is to make matching contributions in the amount of 100% of the first 6% of eligible compensation, as defined in the plan document that each participant contributes into the Plan. Additionally, the Company may make discretionary profit sharing contributions to the Plan. The Company made matching contributions aggregating $10,967,297 and $9,744,109 for the years ended December 31, 2025 and 2024, respectively. The Company made no discretionary profit sharing contributions for the years ended December 31, 2025 and 2024. The Company's contributions are subject to certain limitations as prescribed by the Code.

(1) Description of plan (continued)

Participant investment account options - The Plan currently offers various mutual funds, a common/collective trust, and a money market fund as investment options for participants.

Participant accounts - Each participant's account is credited with the participant's contributions, the Company's matching contributions, and an allocation of (a) the Company's discretionary profit sharing contributions, if any, and (b) the Plan's earnings, and charged with an allocation of administrative expenses. Allocations are based on participant account balances, as defined in the plan document. The benefit to which a participant is entitled is the benefit that can be provided from the participant's vested account.

Vesting - Participants are immediately vested in their contributions plus actual earnings thereon. Participants become 100% vested in the Company's matching and profit sharing contributions plus actual earnings thereon after one year of service. Participants are also 100% vested in the event of death or disability, as defined in the plan document, or termination of service after attaining 65 years of age.

Forfeitures - Forfeitures are first used to pay the Plan's expenses, and then may be used to reduce the Company's contributions to the Plan. Forfeitures aggregating approximately $137,000 and $180,000 were used for these purposes during the years ended December 31, 2025 and 2024, respectively. Unallocated forfeitures as of December 31, 2025 and 2024 were not significant.

Notes receivable from participants - Participants may borrow from their fund accounts a minimum of $1,000 up to a maximum equal to the lesser of $50,000 or 50% of their vested account balance. All notes have a definite repayment period, not to exceed five years, or fifteen years for the purchase of a primary residence. The notes are secured by the balance in the participant's account and bear interest at rates which are commensurate with local prevailing rates as determined by the plan administrator. Principal and interest are paid ratably through payroll deductions. Effective January 1, 2024, participants were not permitted to have more than one note receivable outstanding at a time (See Note 10).

Payment of benefits - Upon termination of service due to death, disability, retirement, severance of employment with the Company, or qualifying under certain "hardship" rules as prescribed by the Internal Revenue Service ("IRS"), a participant may elect to receive distributions from the Plan. Participants may also receive in-service distributions upon attaining 59½ years of age, or for other reasons as outlined in the plan document. Distributions of $1,000 or less will be made in a lump-sum payment. All other distributions may be in the form of a lump-sum payment, installments, a rollover distribution, or an annuity.

(2) Summary of significant accounting policies

Basis of accounting - The financial statements of the Plan are prepared under the accrual method of accounting as required by 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 changes therein, and disclosure of contingent assets and liabilities. Accordingly, actual results may differ from those estimates.

Investment valuation and income recognition - Investments are reported at fair value. 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. See Note 4 for discussions of fair value measurements.

Purchases and sales of securities are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date. Capital gains distributions from mutual funds are recorded as dividend income. Net appreciation in fair value of investments includes the Plan's gains and losses on investments bought and sold as well as held during the year.

Notes receivable from participants - Notes receivable from participants are measured at their unpaid principal balance plus accrued but unpaid interest. Interest income on notes receivable from participants is recorded on the accrual basis. Related fees are recorded as administrative expenses and are expensed when they are incurred.

Contributions - Contributions from the Plan's participants and matching contributions from the Company are recorded in the year in which the employees' contributions are withheld from compensation.

Payment of benefits - Benefits are recorded when paid.

Administrative expenses - Certain expenses of the Plan are paid by the Company and are not included on the statements of changes in net assets available for benefits. Other expenses, such as recordkeeping, consulting, and other professional fees, have been paid by the Plan during the years ended December 31, 2025 and 2024, and have been recorded as administrative expenses on the statements of changes in net assets available for benefits. Investment related expenses are included in net appreciation in fair value of investments.

(3) Information prepared and certified by the trustee

The plan administrator has elected the method of annual reporting compliance permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA. Accordingly, Bank of America, N.A. ("Bank of America"), the trustee of the Plan, has certified that the following data included in the accompanying financial statements and supplemental schedule are complete and accurate:

- Investments at fair value
- Notes receivable from participants
- Net appreciation in fair value of investments
- Dividends and interest
- Other income
- Interest income on notes receivable from participants
- Schedule of assets (held at end of year)

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

(4) Fair value measurements

The framework for measuring fair value provides a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets or liabilities (Level 1) and the lowest priority to unobservable inputs (Level 3).

The three levels of the fair value hierarchy under Financial Accounting Standards Board Accounting Standards Codification 820 are described below:

Level 1 Inputs to the valuation methodology are unadjusted quoted prices for identical assets or liabilities in active markets that the Plan has the ability to access.

Level 2 Inputs to the valuation methodology include quoted prices for similar assets and liabilities in active markets; quoted prices for identical or similar assets and liabilities in inactive markets; inputs other than quoted market prices that are observable for the asset or liability; inputs that are derived principally from or corroborated by observable market data by correlation or other means. If the asset or liability has a specified (contractual) term, the Level 2 input must be observable for substantially the full term of the asset or liability.

Level 3 Inputs to the valuation methodology are unobservable and significant to the fair value measurement.

(4) Fair value measurements (continued)

The fair value measurement level of the Plan's assets and liabilities within the fair value hierarchy is based on the lowest level of any input that is significant to the fair value measurement. Valuation techniques used need to maximize the use of observable inputs and minimize the use of unobservable inputs.

The following is a description of the valuation methodologies used for assets measured at fair value. There have been no changes in the methodologies used at December 31, 2025 and 2024.

Mutual funds: 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.

Common/collective trust: A stable value fund composed primarily of fully benefit-responsive investment contracts valued at the NAV of units of the bank collective trust. The NAV, as provided by the trustee, is used as a practical expedient to estimate fair value.

Money market fund: Valued at the quoted NAV of shares held by the Plan at year-end.

The following tables set forth by level, within the fair value hierarchy, the Plan's investments at fair value as of December 31, 2025 and 2024:

	Investments at Fair Value as of December 31, 2025			
	Level 1	Level 2	Level 3	Total
Mutual funds	$ 221,550,477	$ -	$ -	$ 221,550,477
Money market fund	96,144	-	-	96,144
Total assets in the fair value hierarchy	$ 221,646,621	$ -	$ -	221,646,621
Investment measured at NAV practical expedient*				8,453,250
				$ 230,099,871

	Investments at Fair Value as of December 31, 2024			
	Level 1	Level 2	Level 3	Total
Mutual funds	$ 189,775,483	$ -	$ -	$ 189,775,483
Total assets in the fair value hierarchy	$ 189,775,483	$ -	$ -	189,775,483
Investment measured at NAV practical expedient*				9,104,245
				$ 198,879,728

* In accordance with Subtopic 820-10, the common/collective trust, which is valued at NAV, has not been classified in the fair value hierarchy. The fair value amounts presented in the preceding tables are intended to permit a reconciliation of the fair value hierarchy to the line items presented on the statements of net assets available for benefits.

(4) Fair value measurements (continued)

The common/collective trust is a direct filing entity, and as such, the disclosure of the investment objective is not required.

Investments Measured Using the Net Asset Value per Share Practical Expedient

	Fair Value * 12/31/2025	Fair Value * 12/31/2024	Unfunded Commitments	Redemption Frequency	Redemption Notice Period
Common/collective trust	$ 8,453,250	$ 9,104,245	$ -	**	**

* The fair value of this investment has been estimated using the NAV of the investment.

** Participant transactions (purchases and sales) may occur daily. If the Plan initiates a full redemption of the collective trust, the issuer reserves the right to require advance notice in order to ensure that securities liquidations will be carried out in an orderly business manner.

(5) 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 to terminate the Plan subject to the provisions of ERISA. In the event of the Plan's termination, participants would become 100% vested in the Company's contributions.

(6) Tax status

The IRS has determined and informed the Company by a letter dated June 13, 2014 that the Plan and the related trust are designed in accordance with the applicable sections of the Code. Although the Plan has been amended since the date of this letter, the Plan's management believes that the Plan continues to be designed, and is currently being operated, in compliance with the applicable requirements of the Code, and therefore believes that the Plan is qualified, and the related trust is tax-exempt.

U.S. GAAP requires the Plan's management to evaluate tax positions taken by the Plan and recognize a tax liability (or asset) if the Plan has taken an uncertain tax 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 in progress for any tax periods.

(7) Related party transactions and party-in-interest transactions

Bank of America is the Plan's trustee, as defined by the Plan, and therefore, transactions involving Bank of America qualify as party-in-interest. Merrill Lynch, Pierce, Fenner and Smith is an affiliate of Bank of America and provides recordkeeping services to the Plan. Additionally, Merrill Lynch Consulting Services has provided consulting services to the Plan. Therefore, transactions with these Merrill Lynch entities also qualify as party-in-interest.

Fees paid by the Plan to the above entities and other service providers during the years ended December 31, 2025 and 2024 aggregated $253,794 and $300,812, respectively. These amounts have been included in administrative expenses on the statements of changes in net assets available for benefits. Certain other investment related fees incurred by the Plan have been included in net appreciation in fair value of investments as they are paid through revenue sharing, rather than as a direct payment. The Company has directly paid all other fees related to the Plan's operations.

Additionally, during the years ended December 31, 2025 and 2024, the Plan received approximately $115,000 and $109,000, respectively, in revenue sharing and other reimbursements from parties-in-interest. Of these amounts, approximately $60,000 and $70,000 were used to pay the Plan's expenses during the years ended December 31, 2025 and 2024, respectively.

(8) Risks, uncertainties, and concentrations

The Plan invests in various investment securities. Investment securities are exposed to various risks such as interest rate, market, and credit risk. Market risks include global events, such as a pandemic or international conflict, which could impact the value of investment securities. 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 participants' account balances and the amounts reported on the statements of net assets available for benefits.

As of December 31, 2025 and 2024, approximately 41% and 38%, respectively, of the Plan's investments were invested in three funds.

(9) Reconciliation of financial statements to Schedule H of Form 5500

Certain line items relating to investments and investment income reported on Schedule H of Form 5500 as of December 31, 2024 and for the year then ended have been reclassified in the accompanying financial statements. These reclassifications have no impact on net assets available for benefits as of December 31, 2024 or changes in net assets available for benefits for the year then ended.

(10) Subsequent events

Effective January 1, 2026, in compliance with the latest Code regulations, the Plan was amended to increase the limit for catch-up contributions for participants ages 60 through 63. Additionally, effective January 1, 2026, catch-up contributions made by highly compensated employees (as defined by Code regulations) shall be made as Roth 401(k) deferrals.

Effective January 1, 2026, the Plan's management formalized a loan policy which included wording limiting participants to a maximum of two notes receivable outstanding at a time.

The Plan has evaluated subsequent events through October 13, 2026, which is the date the financial statements were available to be issued. Other than as disclosed above, no significant matters were identified for disclosure during this evaluation.

SUPPLEMENTAL SCHEDULE

EMBRAER AIRCRAFT HOLDING, INC. 401(k) RETIREMENT PLAN

SCHEDULE H, LINE 4i – SCHEDULE OF ASSETS (HELD AT END OF YEAR)

December 31, 2025

EIN: 65-1156742
Plan number: 001

(a)	(b) Identity of issue, borrower, lessor, or similar party	(c) Description of investments including maturity date, rate of interest, collateral, par, or maturity value	(d) Cost	(e) Current value
		Mutual funds:		
	Fidelity	500 Index Fund	(1)	$ 42,984,696
	Fidelity	Contrafund		27,383,967
	Fidelity	International Index Institutional		24,728,133
	PGIM	Total Return Bond R6		21,195,886
	Fidelity	Total Institutional Index Fund		17,600,074
	Fidelity	Mid Cap Index		15,755,667
	Fidelity	Small Cap Index Fund		7,821,589
	American	Mutual Fund Class R6		7,532,522
	Franklin	Small Mid Cap Growth R6		7,242,315
	Fidelity	US Bond Index Fund		6,226,080
	American	Balanced Fund CL R6		5,988,780
	Blackrock	Inflation Protected K		5,322,663
	John Hancock	Disciplined Value R6		4,769,043
	T. Rowe Price	Retirement 2010 CL I		4,377,827
	DFA	US Small Cap Value CL Institutional		3,979,250
	Neuberger Berman	Genisis CL R6		3,677,953
	American	New World Fund		2,899,021
	T. Rowe Price	Retirement 2045 CL I		2,872,709
	T. Rowe Price	Retirement 2035 CL I		2,211,806
	T. Rowe Price	Retirement 2040 CL I		1,975,036
	T. Rowe Price	Retirement 2030 CL I		1,944,110
	T. Rowe Price	Retirement 2025 CL I		1,597,869
	T. Rowe Price	Retirement 2050 CL I		636,147
	T. Rowe Price	Retirement 2020 CL I		343,465
	T. Rowe Price	Retirement 2060 CL I		287,272
	T. Rowe Price	Retirement 2055 CL I		146,315
	T. Rowe Price	Retirement 2065 CL I		46,820
	T. Rowe Price	Retirement 2015 CL I		3,462
		Total mutual funds		221,550,477
		Common/collective trust:		
	Federated	Capital Preservation CL R6		8,453,250
		Money market fund:		
	BlackRock	BLF Fed Fund		96,144
				$ 230,099,871
*	Notes receivable from participants, maturing through August 2040 with interest rates ranging from 4.25% to 9.50% per annum.		-	$ 6,480,826

* Party-in-interest as defined by ERISA.

(1) Cost information may be omitted for the Plan's assets which are participant-directed.

Attachment to 2025 Form 5500
Schedule H, line 4i - Schedule of Assets (Held At End of Year)

Plan Name: EMBRAER AIRCRAFT HOLDING, INC. 401(K) RETIREMENT PLAN **EIN:65-1156742**
Plan Sponsor's Name: EMBRAER AIRCRAFT HOLDING, INC. **PN:001**

(a)	(b) Identity of issue, borrower, lessor, or similar party	(c) Description of investment including maturity date, rate of interest, collateral, par, or maturity value.	(d) Cost	(e) Current Value
	ACCRUED INCOME	ACCRUED INCOME	3,162	3,162
	FEDERATED CAPITAL PRESER CL R6	COMMON / COLLECTIVE TRUSTS	8,453,250	8,453,250
	LOAN FUND	LOANS	6,480,826	6,480,826
	BLF FEDFUND	MONEY MARKET	92,977	92,977
	AMERICAN BALANCED FUND CL R6	MUTUAL FUNDS	6,351,936	5,988,780
	AMERICAN MUTUAL FUND CL R6	MUTUAL FUNDS	6,463,684	7,532,522
	AMERICAN NEW WORLD FUND	MUTUAL FUNDS	2,745,276	2,899,021
	BLACKROCK INFLATION PROTECTD K	MUTUAL FUNDS	5,381,835	5,322,663
	DFA US SMALL CAP VAL CL INSTL	MUTUAL FUNDS	3,793,090	3,979,250
	FIDELITY 500 INDEX FUND	MUTUAL FUNDS	43,091,091	42,984,696
	FIDELITY CONTRAFUND	MUTUAL FUNDS	28,065,445	27,383,967
	FIDELITY INTRNTNL INDX INSTL	MUTUAL FUNDS	24,834,425	24,728,133
	FIDELITY MID CAP INDEX	MUTUAL FUNDS	15,941,037	15,755,667
	FIDELITY SMALL CAP INDEX FUND	MUTUAL FUNDS	7,965,494	7,821,589
	FIDELITY TOTAL INTL INDX FD	MUTUAL FUNDS	17,608,953	17,600,074
	FIDELITY US BOND INDEX FUND	MUTUAL FUNDS	6,229,036	6,226,080
	FRANKLIN SMALL MID CAP GRTH R6	MUTUAL FUNDS	7,451,256	7,242,316
	JOHN HANCOCK DISCIPLIND VAL R6	MUTUAL FUNDS	5,221,330	4,769,043
	NEUBERGER GENESIS FUND R6	MUTUAL FUNDS	4,254,117	3,677,954

Attachment to 2025 Form 5500
Schedule H, line 4i - Schedule of Assets (Held At End of Year)

Plan Name: EMBRAER AIRCRAFT HOLDING, INC. 401(K) RETIREMENT PLAN **EIN:65-1156742**
Plan Sponsor's Name: EMBRAER AIRCRAFT HOLDING, INC. **PN:001**

(a)	(b) Identity of issue, borrower, lessor, or similar party	(c) Description of investment including maturity date, rate of interest, collateral, par, or maturity value.	(d) Cost	(e) Current Value
	PGIM TOTAL RETURN BOND BD R6	MUTUAL FUNDS	22,077,647	21,195,881
	T. ROWE PRICE RTRMT 2010 CL I	MUTUAL FUNDS	4,614,235	4,377,828
	T. ROWE PRICE RTRMT 2015 CL I	MUTUAL FUNDS	3,643	3,462
	T. ROWE PRICE RTRMT 2020 CL I	MUTUAL FUNDS	362,427	343,466
	T. ROWE PRICE RTRMT 2025 CL I	MUTUAL FUNDS	1,684,371	1,597,869
	T. ROWE PRICE RTRMT 2030 CL I	MUTUAL FUNDS	2,042,840	1,944,110
	T. ROWE PRICE RTRMT 2035 CL I	MUTUAL FUNDS	2,300,658	2,211,806
	T. ROWE PRICE RTRMT 2040 CL I	MUTUAL FUNDS	2,048,656	1,975,036
	T. ROWE PRICE RTRMT 2045 CL I	MUTUAL FUNDS	2,962,339	2,872,710
	T. ROWE PRICE RTRMT 2050 CL I	MUTUAL FUNDS	657,155	636,147
	T. ROWE PRICE RTRMT 2055 CL I	MUTUAL FUNDS	151,130	146,315
	T. ROWE PRICE RTRMT 2060 CL I	MUTUAL FUNDS	296,362	287,272
	T. ROWE PRICE RTRMT 2065 CL I	MUTUAL FUNDS	48,109	46,820
	PENDING SETTLEMENT FUND	PENDING SETTLEMENT FUNDS	2,600	2,600
	UNINVESTED CASH	UNINVESTED CASH	5	5

BANK OF AMERICA

RETIREMENT & BENEFIT PLAN SERVICES

Bank of America Merrill Lynch Regulatory Reporting & Operations Department

Form 5500/5500-SF and Form 8955-SSA Manual

May 2026

For plan sponsor use only.

Table of contents

Navigating this document:

- Click the name of a section in the table of contents to go directly to that section.
- Click Return to table of contents at the top of a page to return to this page.

Introduction: From our department to yours 6
Overview 7
What's new 7
Filing process 7
What to file 8
Your Form 5500 series planbook 9
When to file 10
Information to include in your reporting 10
Supporting information you should consider 11
How to file 11
EFAST2 12
Special situations 12
Filing process 13
Merrill responsibilities 13
Plan sponsor filing responsibilities 13
What to file 14
Form 5558 14
Form 5500-SF 14
Form 5500 15
Schedules and attachments a plan sponsor must include in the Form 5500 filing 16
Schedule A, *Insurance Information* 17
Schedule C, *Service Provider Information* 17
Schedule D, *DFE/Participating Plan Information* 18
Schedule G, *Financial Transaction Schedules* 18
Schedule H, *Financial Information* 18
Schedule I, *Financial Information – Small Plan* 19
Schedule R, *Retirement Plan Information* 19
Schedule of Assets (Held at End of Year) 19
Auditor's Report 19
Schedule MEP for Multiple-Employer Plans 20
Summary Annual Report 20

Form 8955-SSA 21
Your planbook 22
Compiling your planbook 22
Providing your Important Notice 22
Publishing your planbook 23
When to file 23
Unextended filing date 23
Extended filing date 23
Filing due date falls on a Saturday, Sunday, or federal holiday 23
Short plan year 23
Final return/report 25
Plan mergers 25
Plan terminations 25
Information to include in your reporting 26
Reporting plan sponsor/administrator information 26
Name and EIN changes 26
Reporting plan information 26
Reporting financial information 27
Reporting compliance information 27
Audit considerations 27
Supporting information you should consider 28
Plan audit package 28
SSAE No. 18 28
Investments at contract value 29
Annual and revalued trust statements 29
Employer Plan Annual Revenue Information Report 29
Participant statement 30
How to file 30
Electronic filing requirements 30
Navigating Web Client 31
Viewing, editing, and printing your planbook 31
Electronic filing on Web Client 32
Accessing the filing 32
EFAST2 attachments 32
Accountant's Opinion (EFAST2 attachment) 32
Other attachments 32
Filing Form 5500 33
Filing Form 8955-SSA 33
Filing statuses 33

EFAST2 34
Registering as an EFAST2 user 34
Updating electronic credentials 35
Signing a return 35
Special situations 36
Selecting an auditor 36
Amendments to filings 36
Delinquent Filer Voluntary Compliance Program 37
Penalty letters 38
Forfeitures 40
Consultative support 40
Outside assets 40
Glossary 41
Useful links 51
Exhibit 1: Business codes and plan characteristics 52
Exhibit 2: Schedule H mapping document 58
Exhibit 3: Schedule I mapping document 64
Exhibit 4: Form 5500-SF mapping document 66
Exhibit 5: Form 5500/5500-SF and Form 8955-SSA annual reporting timelines 68
Plan year-end December 31, 2025 69
Plan year-end January 31, 2026 70
Plan year-end February 28, 2026 71
Plan year-end March 31, 2026 72
Plan year-end April 30, 2026 73
Plan year-end May 31, 2026 74
Plan year-end June 30, 2026 75
Plan year-end July 31, 2026 76
Plan year-end August 31, 2026 77
Plan year-end September 30, 2026 78
Plan year-end October 31, 2026 79
Plan year-end November 30, 2026 80

Neither Merrill nor its representatives provide tax, accounting or legal advice. Clients should review any planned financial transactions or arrangements that may have tax, accounting or legal implications with their personal professional advisor.

Although this manual seeks to provide accurate and comprehensive information relating to the Form 5500/5500-SF and Form 8955-SSA services our Regulatory Reporting and Operations (RR&O) Department provides, it is not intended to be, and should not be construed and relied upon as legal advice.

For plan sponsor use only.
Bank of America is a marketing name for the Retirement Services business of Bank of America Corporation ("BofA Corp."). Banking activities may be performed by wholly owned banking affiliates of BofA Corp., including Bank of America, N.A., Member FDIC. Brokerage and investment advisory services are provided by wholly owned nonbank affiliates of BofA Corp., including Merrill Lynch, Pierce, Fenner & Smith Incorporated, a dually registered broker-dealer and investment adviser and Member SIPC.

Investment products:

Are Not FDIC Insured	Are Not Bank Guaranteed	May Lose Value

© 2025 Bank of America Corporation. All rights reserved.

Introduction: From our department to yours

The Form 5500/5500-SF is part of ERISA's overall reporting and disclosure framework, which is intended to help ensure that employee benefit plans are operated and managed in accordance with certain prescribed standards. It also ensures that participants and beneficiaries, as well as regulators, are provided or have access to sufficient information to protect the rights and benefits of participants and beneficiaries under employee benefit plans.

As part of our ongoing effort to streamline the Form 5500/5500-SF and Form 8955-SSA filing process and reduce the time you spend filing your Form 5500/5500-SF and Form 8955-SSA, Merrill has developed this *Regulatory Reporting and Operations (RR&O) Department Form 5500/5500-SF and Form 8955-SSA Manual*. Herein, you will find descriptions of the services provided by Merrill and the information we require to compile the form. We have also described the process in step-by-step detail, including:

- What's new
- Filing process
- What to file
- Your planbook
- When to file
- Information to include in your reporting
- Supporting information you should consider
- How to file
- EFAST2
- Special situations
- Glossary
- Useful links
- Exhibits

Our Regulatory Reporting and Operations (RR&O) Department offers comprehensive Form 8955-SSA and Form 5500/5500-SF (known as the Form 5500 series planbook) services. We assist you with filing a complete and timely Form 5500/5500-SF and Form 8955-SSA, and we will gladly work with you and your auditors to finalize specific items for your Form 5500/5500-SF and Form 8955-SSA.

This manual is a companion to the *Regulatory Reporting and Operations (RR&O) Department Manual Featuring Nondiscrimination Testing*. We sincerely hope that you will find our Form 5500/5500-SF and Form 8955-SSA manual a valuable resource and reference tool.

Overview

What's new

There are several changes that impact the Form 5500/5500-SF and Form 8955-SSA filing process, effective with plan years beginning on or after January 1, 2023.

Changes	Description
Multiple-employer plans	The multiple-employer plan attachment is no longer required. Multiple-employer plan information including identifying the type of multiple-employer plan and the participating employer information is now required on the new Schedule MEP.
Participant counts	On the Form 5500/5500-SF the total number of participants with account balances has been split into two entries: One is the total number of participants with account balances at the beginning of the plan year and the other is the total number of participants with account balances at the end of the plan year.
Small plan audits participant counting methodology revisions	The Form 5500/5500-SF instructions have been updated to reflect that there has been a change in the methodology for counting the number of participants used to determine when a defined contribution pension plan may file as a small plan, including determining eligibility for the conditional waiver of the independent qualified public accountant (IQPA) audit requirement. Beginning with 2023 plan year filings, a defined contribution plan counts participants with account balances at the beginning of the plan year, except for new plans which use the number of participants with account balances at the end of the plan year.
Administrative expenses	Form 5500 Schedule H has been updated to include eleven categories of administrative expenses. These categories are salaries and allowances, contract administrator fees, recordkeeping fees, IQPA audit fees, investment advisory and investment management fees, bank or trust company trustee/custodial fees, actuarial fees, legal fees, valuation/appraisal fees, other trustee fees and expenses, and other expenses.
IRS compliance questions	New IRS compliance questions regarding coverage and nondiscrimination testing, ADP/ACP testing, and pre-approved plan opinion letters have been added to the Schedule R and the Form 5500-SF.
Administrative penalties	The maximum civil penalty amount of up to $2,739 that may be imposed for each day a plan administrator fails or refuses to file a complete and accurate Form 5500/5500-SF. This penalty amount is generally applicable to penalties assessed after January 15, 2025.
Form 5558	Form 5558 is now filed electronically. The status of the filing can be confirmed in the Web Client status report. Also, the Form 5558 is no longer used to apply for an extension of time to file Form 5330, *Return of Excise Taxes Related to Employee Benefit Plans*. Instead, use Form 8868, *Application for Extension of Time to File an Exempt Organization Return or Excise Taxes Related to Employee Benefit Plans*.

Filing process

Responsible party	Description
Merrill responsibilities	During the first six months of the plan year, Merrill: • Confirms we have the information we need, • Files a Form 5558, and

	• Sends you your plan's Audit Package (which includes your Annual Trust Statement), Form 5500/8955-SSA Questionnaire, *Employer Plan Annual Revenue Information Report*, Summary Annual Report (SAR) and Form 5500/5500-SF and Form 8955-SSA that we compiled.
Plan sponsor responsibilities	You need to: • Return the Form 5500/8955-SSA Questionnaire, • Have your plan's independent auditor complete an audit of your plan (if required), review and edit your filings. • File your Form 5500/5500-SF and Form 8955-SSA by the applicable deadline (seven months after the end of the plan year or 9½ months on extension), and • Furnish the SAR to participants.

What to file

Form, schedule, or attachment	Description
Form 5558	Form 5558, *Application for Extension of Time to File Certain Employee Plan Returns*, is used to extend the filing deadline for the Forms 5500, 5500-SF, 5500-EZ, and Form 8955-SSA. The extension is 2½ months.
Form 5500-EZ	Form 5500-EZ is used by one-participant plans and foreign plans that are not subject to the requirements of section 104(a) of the Employee Retirement Income Security Act of 1974 (ERISA) to satisfy certain annual reporting and filing obligations imposed by the Code.
Form 5500-SF	Form 5500-SF is used to meet the IRS and DOL filing requirements that generally apply for small employee benefit plans. The Form 5500-SF reports identification information and basic plan information, such as plan name and plan sponsor and plan administrator name and address, financial information, participant counts, pension and welfare characteristic codes, funding and benefit arrangements, compliance questions, funding, plan termination and transfer of assets information.
Form 5500	Form 5500 is used to meet the IRS and DOL filing requirements that generally apply for large employee benefit plans. The Form 5500 reports identification information and basic plan information, such as plan name and plan sponsor and plan administrator name and address, participant counts, pension and welfare characteristic codes, funding and benefit arrangements, and the schedules that are attached.
Schedule A, *Insurance Information*	Schedule A reports information about insurance policies purchased under the plan, including premiums and commissions paid. Your insurance company is required to supply the basic information for Schedule A within 120 days after the end of the plan year. This information should be submitted to Merrill.
Schedule C, *Service Provider Information*	Schedule C reports compensation fees paid by your plan directly or indirectly to service providers and any changes of accountants. In general, only large plans that paid more than $5,000 in compensation are required to report compensation information.
Schedule D, *Direct Filing Entity/ Participating Plan Information*	Schedule D reports information for plans that participate in a Direct Filing Entity (DFE). DFEs include common or collective trusts, master trust investment accounts, pooled separate accounts and 103-12 investment entities. We will compile Schedule D when applicable. Each Common Collective Trust must notify its participating plans whether it intends to file a Form 5500/5500-SF as a DFE or not.

Form, schedule, or attachment	Description
Schedule G, *Financial Transaction Schedules*	The Schedule G only applies to defined contribution plans if certain conditions apply, which is not typical for virtually all of Merrill's recordkeeping customers. Additional information may be required from you to assist us in compiling your Schedule G.
Schedule H, *Financial Information*	Schedule H reports financial information about the plan and must include a schedule of assets held for investment. In general, plans that covered 100 or more participants with account balances as of the beginning of the plan year are required to complete this schedule. Filing Schedule H also requires that your accountants conduct an independent audit of the plan.
Schedule I, *Financial Information – Small Plan*	Schedule I reports financial information about the plan. In general, plans that covered less than 100 participants with account balances as of the beginning of the plan year are required to complete this schedule, unless the plan sponsor files a Form 5500-SF.
Schedule R, *Retirement Plan Information*	Schedule R reports information on ESOPs, plan distributions, and information on funding for plans subject to the minimum funding requirements of IRC §412.
Schedule of Assets (Held at End of Year)	This is the schedule of all assets held for investment purposes at the end of the plan year. It is attached to line 4i of the Schedule H. It is provided in the trust report under the heading *Statement of Assets*.
Auditor's Report	Plans filing the Schedule H are required to engage an independent qualified public accountant (IQPA) and attach a report of the IQPA, unless an exception applies.
Schedule MEP	Multiple-employer plan information including identifying the type of multiple-employer plan and the participating employer information is now required on the new Schedule MEP.
Summary Annual Report (SAR)	This report summarizes the financial information reported on the Form 5500/5500-SF. Plan administrators must furnish this report to each participant and beneficiary receiving benefits under the plan.
Form 8955-SSA	Form 8955-SSA reports certain information relating to each plan participant with a deferred vested benefit. A Form 8955-SSA is not required for a plan year if the plan administrator has no information to report.

Your Form 5500 series planbook

Topic	Description
Compiling your planbook	Merrill (listed in Web Client as the "Transmitter") compiles your forms, schedules and attachments (the planbook) based on information from the recordkeeping system, trust statements, prior-year filing(s), and the Forms 5500 and 8955-SSA Questionnaire.
Providing your *Important Notice*	Merrill provides an *Important Notice* with information that is specific to your plan's Form 5500/5500-SF and Form 8955-SSA filings.
Publishing your planbook	Merrill publishes your planbook to Web Client so that you and, upon your authorization, your auditor can review, edit, and file your Form 5500/5500-SF and Form 8955-SSA, if applicable.

When to file

Situation	Due date
Regular due date	All required forms, schedules, statements, and attachments must be filed by the last day of the seventh calendar month after the end of the plan year.
Extension	A plan may obtain a one-time extension of time to file a Form 5500 annual return/report and a Form 8955-SSA (up to 2½ months) by filing IRS Form 5558, on or before the normal due date (not including any extensions) of the return/report.
Filing due date falls on a Saturday, Sunday or federal holiday	If the filing due date falls on a Saturday, Sunday, or federal holiday, the return/report may be filed on the next day that is not a Saturday, Sunday, or federal holiday.
Short plan year	File the form and applicable schedules by the last day of the seventh calendar month after the short plan year ends or by the extended due date, if filing under an authorized extension of time.
Final return/report	A final return/report should be filed upon the transfer of all assets to another plan (for example, plan merger) or the complete distribution of assets of the plan to participants and beneficiaries (for example, plan termination), which may create a short plan year.
Plan merger	If a plan merges, a final return/report should be filed for the plan year (12 months or less) that ends when all plan assets were legally transferred to the control of another plan. This may create a short plan year. File the form and applicable schedules by the last day of the seventh calendar month after the short plan year ends or by the extended due date, if filing under an authorized extension of time.
Plan termination	If a plan terminates, a final return/report should be filed upon the complete distribution of assets of the plan, which may create a short plan year. As with a short plan year, file the form and applicable schedules by the last day of the seventh calendar month after the short plan year ends or by the extended due date, if filing under an authorized extension of time.

Information to include in your reporting

Information	Description
Reporting plan sponsor/administrator information	The nine-digit employer identification number (EIN) assigned to the plan sponsor/employer must be reported on the form along with the plan sponsor's name, mailing address, city or town, state or province, country, ZIP or foreign postal code, and the plan sponsor's six-digit business code that best describes the nature of the plan sponsor's business. Changes to a plan sponsor's name and EIN significantly impact reporting.
Reporting plan information	The plan name, plan year, and EIN reported on the Form 5500/5500-SF filings should match what is reported on the Form 8955-SSA and Form 5558 extension.
Reporting financial information	Reporting may be on a cash, modified cash or accrual basis. (Merrill's default methodology is to report on a cash basis.) All amounts reported are rounded off to the nearest dollar. Any other amounts are subject to rejection.
Reporting compliance information	Plans that file the Form 5500/5500-SF reports must answer the required compliance questions with either "Yes" or "No" and include any additional information that may be required.
Audit considerations	Situations that might result in additional scrutiny include blank line items (that require a response), data inconsistencies, a large drop in participants or a large dollar amount in the "Other" asset line if the plan does not have brokerage accounts.

Supporting information you should consider

Supporting information	Description
Audit package	The Trust Statement Team provides a Supplemental Package that includes the Annual Revalued Statement, Q6 Summary Report, Schedule H Mapping Document and a list of frequently asked questions (FAQs).
SSAE No. 18	The SSAE No. 18, *Statement on Standards for Attestation Engagements No. 18*, contains the requirements and guidance for a service auditor to report on a service organization's controls and processes.
Investments at contract value	Most investment funds are reported on the trust statement at fair market value. However, there can be plan investments that are reported at contract value. To facilitate reporting, the applicable fund in its annual statement will generally provide a conversion factor to convert contract value to fair market value. Our default for CCTs is to not make any adjustment to reported fair value unless instructed by the plan sponsor/administrator or its auditor.
Annual and revalued trust statements	The annual statement is the trust statement provided in the audit package. The revalued statement is generally the annual statement revalued to provide the realized and unrealized gains/losses on a current year basis. Realized and unrealized gain/loss for an investment is the difference between the market value and the cost.
Employer Plan Annual Revenue Information Report	The *Employer Plan Annual Revenue Information Report* includes information about fees and revenues that have been paid directly and indirectly from the plan to Merrill and certain other service providers. This information may need to be included on the Schedule C. Merrill provides detailed disclosures about the indirect compensation it receives in order for it to qualify as eligible indirect compensation to the extent applicable.
Participant statement	Plan sponsors/administrators who are required to report a participant on the Form 8955-SSA must also provide a participant statement containing the applicable information (also referred to as the "registration statement") by the deadline for filing the Form 8955-SSA.

How to file

Topic	Description
Electronic filing requirements	All retirement plans subject to Title I of ERISA are required to submit annual return/reports (Form 5500 or Form 5500-SF) electronically through the ERISA Filing Acceptance System II (EFAST2) and plans that are required to report participants with deferred vested benefits are generally required to file the Form 8955-SSA to report that information electronically through the IRS Filing Information Returns Electronically (FIRE) system.
Navigating Web Client	Upon receiving an email notification, plan sponsors will be able to use their Web Client credentials to view, edit, print, and file their forms. There are specific instructions on each page of Web Client providing additional information on how to navigate each page.
Viewing, editing, and printing your planbook	Upon receiving an email notification, plan sponsors should use their Web Client username and password to view, edit, and print all the forms and attachments that were published as needed prior to filing.
Electronic filing on Web Client	After the forms are accessed and all applicable attachments are added, the Form 5500/5500-SF is filed through a four-step process and the Form 8955-SSA is filed through a three-step process.
Filing statuses	There are many filing statuses for the Form 5500/5500-SF and Form 8955-SSA. The Form 5500/5500-SF filing is completed when it receives a status of *Filing Received* and the Form 8955-SSA is completed when the status is *Filed*.

EFAST2

Topic	Description
Registering as an EFAST2 user	Plan administrators (who have not already registered) must obtain EFAST2 electronic credentials to sign and submit Form 5500/5500-SF filings from the Department of Labor by registering on the EFAST2 website (www.efast.dol.gov).
Updating electronic credentials	Individuals may need to change their profile information, including the user type(s) that are associated with their user ID.
Signing a return	To electronically sign Form 5500/5500-SF filings, plan administrators must obtain EFAST2 electronic credentials from the DOL by registering on the EFAST2 website (www.efast.dol.gov). The plan sponsor/administrator must register as a Filing Signer to sign the return.

Special situations

Special situation	Description
Selecting an auditor	It is important for a plan administrator to select an independent Certified Public Accountant (CPA) who possesses the requisite knowledge of plan audit requirements and expertise to perform the audit in accordance with professional auditing standards.
Amending returns	Both Form 5500/5500-SF filings and Form 8955-SSA filings may be amended to correct errors and/or omissions in a previously filed annual return/report. The amended Form 5500/5500-SF filing and any amended schedules and/or attachments must conform to the requirements in the instructions. To amend the Form 8955-SSA, file a full and complete Form 8955-SSA that conforms to the "How to File" section in the instructions.
Late filings	The Delinquent Filer Voluntary Compliance Program (DFVCP) of the Department of Labor (DOL) may be utilized to limit the monetary penalties imposed on a plan administrator for the untimely filing of Form 5500/5500-SF. The DFVCP also impacts IRS penalties for late Form 5500 filings and certain late Form 8955-SSA filings.
Penalty letters	Both the IRS and DOL have expedited their process of issuing penalty letters and the IRS is no longer providing warning letters concerning filings. Frequently, penalties can be avoided by responding timely with missing or corrected information.
Forfeitures	Forfeitures should be used timely to either reduce contributions, pay plan expenses and/or be allocated among plan participants as provided by your plan document.
Consultative support	You may request consultative support from the Regulatory Reporting and Operations (RR&O) team with regard to your Form 5500/5500-SF and Form 8955-SSA filings by sending an email with your question directly to RGCompliance.Consulting@bofa.com or you may contact your Client Service Manager, who will arrange for a conference call.
Outside assets	If your plan has outside assets that are not recordkept by Merrill, you need to revise your planbook to include any additional financial information applicable to your plan during the plan year.
First-year audits	Plans that have the number of participants with account balances at the beginning of a plan year increase to over 100 should review whether they are subject to an audit for the first time.

Filing process

Merrill responsibilities

TIMING	TASK	CRITICAL DATES
First four months of plan year	• We confirm that we have all the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• We will mail your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
Fifth through seventh month of plan year	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable (unless instructed otherwise).	End of seventh month after plan year-end (PYE)
	• We compile Form 5500/5500-SF, all related schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	

Plan sponsor filing responsibilities

TIMING	TASK	CRITICAL DATES
First four months after plan year	• You return the signed and dated Form 5500/8955-SSA Questionnaire.	
Beginning the fifth month after plan year	• You have your plan's independent auditor complete an audit of your plan (if required for your Form 5500 filing).	
End of the sixth month	• Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.	End of the sixth month
Seventh month after plan year	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
Seventh through tenth month after plan year	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is seven months after the plan year-end. If a Form 5558 is filed timely, the extended filing deadline is extended to 9½ months after the plan year-end.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	End of seventh month after PYE
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	Ninth month after PYE
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	Nine-and-one-half months after PYE
Eleven-and-one-half months after beginning of plan year	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	Eleven-and-one-half months after PYE

What to file

Form 5558

Merrill files the Form 5558, *Application for Extension of Time to File Certain Employee Plan Returns*, by 2½ months after the plan year-end date to extend the filing deadlines for plans, if we compile Form 5500/5500-SF filings or the Form 8955-SSA for the applicable plan year, unless you instructed us not to file. There is no detriment for properly filing for an extension even if you file by the unextended deadline.

The Form 5558 is used to extend Form 5500/5500-SF and the Form 8955-SSA. If it is only used to extend these forms, it does not need to be signed. A single Form 5558 may only be used to request extensions for a single plan. Applications for extensions of other plans must be submitted on additional Forms 5558. A plan sponsor is not permitted to attach a list of plans to the Form 5558. The instructions provide that lists attached to a Form 5558 will not be processed.

There is also a checkbox for recently adopted plans that are requesting an extension of time to file a Form 5500/5500-SF return/report where a Form 5500/5500-SF return/report is being filed for that plan for the first time. Failure to check when an extension is for a new plan could result in an IRS penalty letter for a late filing as the IRS will not know that the extension is for a new plan.

Form 5500-SF

The Form 5500-SF, *Short Form Annual Return/Report of Small Employee Benefit Plan*, is a simplified annual reporting form that generally does not require any additional schedules for defined contribution plans other than certain money purchase plans. The required questions on the 2023 Form 5500-SF have changed since the 2022 Form 5500-SF. Part V, question 10a is updated to remind filers to continue to check the box “yes” if there is a failure to transmit participant contributions for any prior year failures until fully corrected. A new Part VIII (“IRS Compliance Questions") is added, regarding whether the plan uses the permissive aggregation rules to satisfy coverage and nondiscrimination tests, how the 401(k) plan intends to satisfy the nondiscrimination requirement, and whether the plan sponsor is an adopter of a pre-approved plan. To be eligible to use the Form 5500-SF, a plan must meet all the following requirements:

- The plan must generally have fewer than 100 participants with account balances at the beginning of the plan year or be eligible to file as a small plan under the 80-to-120 participant rule [29 CFR 2520.103-1(d)].
- The plan must be exempt from the requirement that it be audited by an independent qualified public accountant.
- The plan must have 100% of its assets invested in certain secure investments with a readily determinable fair value (for this purpose participant loans that meet the requirements of ERISA §408(b)(1) and investment products issued by banks and licensed insurance companies that provide valuation information at least annually to the plan administrator are treated as having a readily determinable fair market value).
- The plan must hold no employer securities.

- The plan must not be an Employee Stock Ownership Plan (ESOP).
- The plan must not be a multiemployer plan.

The Form 5500-SF is used to disclose certain basic information about the plan and the plan sponsor. It also is used to disclose financial information and compliance issues comparable to what is reported on Schedule I, *Financial Information - Small Plan*. The Form 5500-SF also requires that certain plan characteristics be reported through the use of plan characteristic codes. There are also parts of the Form that address pension-funding compliance for plans subject to minimum funding requirements. The Form also requires a short disclosure concerning plan terminations and transfers of assets.

Small plans that are not eligible to file the Form 5500-SF may generally file the Form 5500 and attach the schedules that apply to small plan filings. Although plans are not required to a file a Form 5500-SF, because the Form 5500-SF is shorter and simpler than the Form 5500, Merrill will assume you want to file it. We will compile a Form 5500-SF for your plan, unless you determine that you are not eligible for the short form and request that we compile a Form 5500 for your plan.

Form 5500

All pension benefit plans covered by ERISA must file a Form 5500, *Annual Return/Report of Employee Benefit Plan*, unless an exception applies. The return/report must be filed whether or not the plan is "tax-qualified," benefits no longer accrue, contributions were not made this plan year, or contributions are no longer made. Pension benefit plans required to file include both defined benefit plans and defined contribution plans. If a plan subject to filing does not qualify for an exception, such as by meeting the requirement for a small plan filing, it must file the Form 5500.

The types of pension benefit plans for which a return/report must be filed include:

1. Profit-sharing plans, stock bonus plans, money purchase plans, 401(k) plans, and so on.
2. Annuity arrangements under Code section 403(b)(1) and custodial accounts established under Code section 403(b)(7) for regulated investment company stock.
3. Individual retirement accounts (IRAs) established by an employer under Code §408(c).
4. Church pension plans electing coverage under Code §410(d).
5. Pension benefit plans that cover residents of Puerto Rico, the U.S. Virgin Islands, Guam, Wake Island, or American Samoa. This includes a plan that elects to have the provisions of §1022(i)(2) of ERISA apply.
6. Plans that satisfy the Actual Deferral Percentage requirements of Code §401(k)(3)(A)(ii) by adopting the "SIMPLE" provisions of §401(k)(11).

A Form 5500 filing is not required for any of the following types of pension benefit plans:

1. An unfunded excess benefit plan. See ERISA §4(b)(5).
2. An annuity or custodial account arrangement under Code §403(b)(1) or (7) not established or maintained by an employer as described in DOL Regulation 29 CFR 2510.3-2(f).
3. A Savings Incentive Match Plan for Employees of Small Employers (SIMPLE) that involves SIMPLE IRAs under Code §408(p).

4. A simplified employee pension (SEP) or a salary reduction SEP described in Code §408(k) that conforms to the alternative method of compliance in 29 CFR 2520.104-48 or 2520.104-49. A SEP is a pension plan that meets certain minimum qualifications regarding eligibility and employer contributions.
5. A church pension benefit plan not electing coverage under Code section 410(d).
6. A pension plan that is maintained outside the United States primarily for the benefit of persons substantially all of whom are nonresident aliens. However, certain foreign plans are required to file the Form 5500-EZ with the IRS or may file the Form 5500-SF, Short Form Annual Return/Report of Employee Benefit Plan, electronically with EFAST2. See the Form 5500-EZ instructions for the filing requirements.
7. An unfunded pension plan for a select group of management or highly compensated employees that meets the requirements of 29 CFR 2520.104-23, including timely filing of a registration statement with the DOL.
8. An unfunded, dues-financed pension benefit plan that meets the alternative method of compliance provided by 29 CFR 2520.104-27.
9. An individual retirement account or annuity not considered a pension plan under 29 CFR 2510.3-2(d).
10. A governmental plan.

Schedules and attachments a plan sponsor must include in the Form 5500 filing

SCHEDULE OR ATTACHMENT	WHEN TO INCLUDE
Schedule A	• Complete if your plan has insurance contracts.
Schedule C	• Complete Part I if you filed the Form 5500 as a large pension plan and your service provider was paid $5,000 or more, Part II if your service provider failed to provide information necessary for you to complete Part I, and Part III if your accountant was terminated.
Schedule D	• Complete Part I if your plan participated in Common/Collective Trust (CCT), Pooled Separate Account (PSA), Master Trust Investment Account (MTIA) or a 103-12 Investment Entity at any time during the plan year.
Schedule G	• Complete if Schedule H, lines 4b (loans other than participant loans in default), 4c (leases in default or uncollectible), or 4d (nonexempt transactions with any party-in-interest) are "Yes."
Schedule H	• Complete if you filed the Form 5500 as a large pension plan.
Schedule I	• Complete if you filed the Form 5500 as a small pension plan.
Schedule R	• Complete if you are filing the Form 5500, if applicable.
Schedule of Assets	• Generally include if you filed the Form 5500 as a large pension plan.
Auditor's Report	• Generally include if you filed the Schedule H.
Schedule MEP	• Multiple-employer plan information including identifying the type of multiple-employer plan and the participating employer information is now required on the new Schedule MEP.

Schedule A, *Insurance Information*

Schedule A (Form 5500) must be attached to the Form 5500 filed for every defined contribution pension plan required to file a Form 5500 if any benefits under the plan are provided by an insurance company, insurance service, or other similar organization. This includes investment contracts with insurance companies such as guaranteed investment contracts (GICs). In addition, Schedules A must be attached to a Form 5500 filed for GIAs, MTIAs, and 103-12 IEs for each insurance or annuity contract held in the MTIA or 103-12 IE, or by the GIA.

Information entered on Schedule A should pertain to the insurance contract or policy year ending with or within the plan year (for reporting purposes, a year cannot exceed 12 months). The information reported includes information concerning insurance contract coverage, fees, commissions, and investments in annuity contracts.

The insurance company, insurance service, or other similar organization is required under ERISA section 103(a)(2) to provide the plan administrator with the information needed to complete this return/report.

Schedule C, *Service Provider Information*

"Large plans" must attach a Schedule C, *Service Provider Information*, as part of the Form 5500 filing. A plan is typically required to file a Schedule C if the plan has 100 or more participants with account balances as of the beginning of the plan year, and $5,000 or more in reportable compensation in connection with services rendered to the plan.

- Part I of Schedule C is used to report persons who rendered services to or who had transactions with the plan during the reporting year and who received directly or indirectly $5,000 or more in reportable compensation for their services or their position with the plan. Schedule C reports detailed information concerning the direct and indirect compensation that service providers receive.
- Part II of the Schedule C must be completed to report a termination in the appointment of an accountant. For more information on what is required, see the Schedule C booklet on Benefits OnLine®.
- Part III of the Schedule C must be completed if there is a change in the appointment of an accountant or enrolled actuary during the plan year. An explanation of the reason for the termination and the terminated firm's EIN must be reported on the Schedule C.

Plans Impacted

Plans that are required to file Schedule C and are covered by the Employee Retirement Income Security Act (ERISA) such as:

- 401(k)
- Profit sharing
- Money purchase
- Defined benefit
- Stock bonus
- ESOP
- 403(b) plans covered by ERISA

Payments made directly by the plan sponsor that are not reimbursed by the plan are not reported on the Schedule C. See the Schedule C booklet on Benefits OnLine® for more information.

Schedule D, *DFE/Participating Plan Information*

Schedule D must be attached to the Form 5500 filed by employee benefit plans when the plan participated or invested in one or more common/collective trusts (CCTs), pooled separate accounts (PSAs), master trust investment accounts (MTIAs), or 103-12 Investment Entities (103-12 IEs) at any time during the plan year. Schedule D is also used by a Direct Filing Entity (DFE) that invested or participated in any MTIAs, 103-12 IEs, CCTs, and/or PSAs.

The DOL created the option for the manager of a fund such as a pooled separate account, common or collective trust, master trust investment, or 103-12 investment entity (hedge fund, private equity, REIT, and so on) to provide information regarding the underlying assets of their funds to the DOL by filing a Form 5500 as a DFE. When the fund manager files as a DFE, each ERISA plan investing in the fund may provide less detail on the plan's Form 5500 regarding the fund on the financial schedules the plan files (for example, Schedule H of the plan's Form 5500). Because filing as a DFE simplifies the reporting requirements for the ERISA plan's Form 5500, many fund managers file a Form 5500 as a DFE.

As a result of the DOL's matching program for Form DFE filers and ERISA plan Form 5500 filings, it is important that the information provided to the plan by the DFE be accurate.

Schedule G, *Financial Transaction Schedules*

The Schedule G to the Form 5500 only applies to defined contribution plans if certain conditions apply, which is not typical for most of Merrill Lynch's recordkeeping customers. Schedule G is a schedule that must be attached to the Form 5500 that is filed for a large plan to report loans or fixed income obligations in default or determined to be uncollectible as of the end of the plan year, leases in default or classified as uncollectible, and nonexempt transactions.

The instructions are sometimes misinterpreted as requiring reporting of individual participant loans. However, the instructions to Schedule G specifically state:

> "Do not report in Part I participant loans under an individual account plan with investment experience segregated for each account, that are made in accordance with 29 CFR 2550.408b-1 and that are secured solely by a portion of the participant's vested accrued benefit."

Schedule H, *Financial Information*

Schedule H to the Form 5500 is used to report large plan financial information.

The Schedule H must be attached to a Form 5500 filed for a defined contribution plan that covered 100 or more participants with account balances as of the beginning of the plan year. There are several exceptions to the filing requirements:

1. Fully insured pension plans that meet the requirements of 29 CFR 2520.104-44 are exempt from completing the Schedule H.
2. If a Schedule I was filed for the plan for the 2024 plan year or a Form 5500-SF and the plan covered fewer than 121 participants with account balances as of the beginning of the 2025 plan year, the Schedule I may be completed instead of a Schedule H.
3. Plans that file a Form 5500-SF for the 2025 plan year are not required to file a Schedule H for that year.

Schedule I, *Financial Information – Small Plan*

Schedule I to the Form 5500 is used to report small-plan financial information.

The Schedule I must be attached to a Form 5500 filed for a defined contribution plan that covered fewer than 100 participants with account balances as of the beginning of the plan year. If a Schedule I or a Form 5500-SF was filed for the prior plan year and the plan covered fewer than 121 participants with account balances as of the beginning of the current plan year, the Schedule I may be completed instead of a Schedule H.

Schedule R, *Retirement Plan Information*

Schedule R is a schedule to the Form 5500 that reports certain information on plan distributions, funding, and the adoption of amendments increasing or decreasing the value of benefits in a defined benefit pension plan, as well as certain information on employee stock ownership plans (ESOPs), and multiemployer defined benefit plans.

Schedule of Assets (Held at End of Year)

The Statement of Asset information that is provided by Merrill is included as an attachment to the Schedule H as a stand-alone document. Plan sponsors may still create and attach their own schedule of all assets held for investment purposes at the end of the plan year. They may use the information provided in the trust report under the heading "Statement of Assets." This schedule of assets held is aggregated and identified by issue, maturity date, rate of interest, collateral, par or maturity value, cost and current value, and, in the case of a loan, the payment schedule. This schedule must be clearly labeled "Schedule H, line 4i –Schedule of Assets (Held at End of Year)."

Auditor's Report

The administrator of a defined contribution plan that files a Schedule H generally must engage an Independent Qualified Public Accountant (IQPA) to prepare an Auditor's Report pursuant to ERISA. The Auditor's Report must be attached to the Form 5500 when a Schedule H is attached unless line 3d(1) or 3d(2) on the Schedule H is checked. For instructions on uploading attachments, see the Department of Labor's EFAST2 FAQs at https://www.dol.gov/sites/dolgov/files/ebsa/about-ebsa/our-activities/resource-center/faqs/efast2-form-5500-processing.pdf.

An Auditor's Report generally consists of an Accountant's Opinion, Financial Statements, Notes to the Financial Statements, and Supplemental Schedules. Any separate financial statements prepared in order for the Auditor's Report to form the opinion and notes to these financial statements must be attached to the Form 5500. Any separate statements must include the information required to be disclosed in Parts I and II of the Schedule H; however, they may be aggregated into categories in a manner other than that used on the Schedule H. The separate statements must consist of reproductions of Parts I and II or statements incorporating by reference Parts I and II. See ERISA section 103(a)(3)(A), and the DOL regulations 29 CFR 2520.103-1(a)(2) and (b), 2520.103-2, and 2520.104-50.

The administrator of a small defined contribution plan that files a Schedule I does not need to engage an Independent Qualified Public Accountant (IQPA) to prepare an Auditor's Report pursuant to ERISA if it complies with the conditions of DOL Reg. §2520.104-46 which are discussed in detail under the instructions for completing line 4k of Schedule I to the Form 5500.

Schedule MEP for Multiple-Employer Plans

A new Schedule MEP (Multiple-Employer Pension Plan Information) is added for use with both Form 5500 and Form 5500-SF. Schedule MEP generally consolidates SECURE Act related reporting for a MEP filer in one easily identifiable schedule, including the ERISA section 103(g) participating employer information and aggregate account information. For Form 5500-SF filers, a new checkbox is added to Part I, line A, to indicate that a Schedule MEP is attached. Schedule MEP requires information consistent with that which was required to be reported via attachment for the 2021 and 2022 forms, including identifying different types of multiple-employer defined contribution plans filing the Form 5500-SF (association retirement plans, PEO multiple-employer plans, and other multiple-employer plans). Pooled employer plans may not file Form 5500-SF. Instead, all pooled employer plans, regardless of size, must file Form 5500 and include Schedule MEP in that filing.

Summary Annual Report

A Summary Annual Report (SAR) is a summary of the information contained in the Form 5500, *Annual Return/Report of Employee Benefit Plan*. The plan administrator of any employee benefit plan must furnish the SAR annually to each participant and beneficiary receiving benefits under the plan. The SAR must be furnished within nine months after the close of the plan year. However, when the IRS has granted an extension of time to file an annual report (Form 5500/5500-SF filing), the deadline for furnishing the report is extended to two months after the close of the period for which the extension was granted.

For example, the deadline for furnishing an SAR for a calendar year plan that is not on extension is Sept. 30. However, if a calendar-year plan annual report is extended until Oct. 15, the SAR must be furnished by Dec. 15.

Merrill provides the SAR in DOL-required format. Neither Merrill nor a client may change the contents, style, or format of the SAR from the contents, style and format set forth in DOL Reg. §2520.104b-10. The regulation requires that the SAR consist of a completed copy of the form prescribed in the regulation. The information used to complete the SAR form is based upon information contained in the plan's most recent Form 5500/5500-SF annual report. Any portion of the SAR form which is not applicable to the plan to which the SAR relates, or which would require information which is not required to be reported on the plan's Form 5500/5500-SF may be omitted.

Under DOL Reg. §2520.104b-10 if the plan administrator wants to add an additional explanation of any information contained on the SAR, such explanation must be included at the end of the completed SAR form and must have the heading "Additional Explanation."

See the Summary Annual Reports booklet on Benefits OnLine® for more information.

Form 8955-SSA

Under IRC §6057(a), the plan administrator of a plan that is subject to the vesting standards of section 203 of the Employee Retirement Income Security Act of 1974 (ERISA) is required to report certain information relating to each plan participant with a deferred vested benefit. A Form 8955-SSA is not required for a plan year if the plan administrator has no information to report.

The Form 8955-SSA is a stand-alone form used to report information about separated participants with deferred vested benefits under the plan. The Form 8955-SSA is filed separately from the Form 5500/5500-SF and is filed through the IRS FIRE system. Reporting is required for participants who have a deferred vested benefit under the plan and who:

- Separated from service covered by the plan in the prior plan year;
- Were reported as deferred vested participants on another plan's filing if their benefits were transferred (other than in a rollover) to the plan during the covered period;
- Previously were reported under the plan but have been paid out or are no longer entitled to those deferred vested benefits; or
- Previously were reported under the plan but whose information is being corrected.

The due date for filing the Form 8955-SSA for the 2025 plan year is the last day of the seventh month following the last day of that plan year (plus extensions). This is the same as the filing deadline that applies to the Form 5500/5500-SF.

Example: A 2025 calendar year plan that is required to file a Form 8955-SSA must file the Form 8955-SSA with the IRS by July 31, 2026, unless a valid extension is obtained, such as by filing the Form 5558.

Any plan that is subject to the vesting standards of section 203 of ERISA is required to file the Form 8955-SSA to report certain information relating to each plan participant with a deferred vested benefit (for example, profit sharing plans, 401(k) plans, and money purchase plans).

The *Form 5558, Application for Extension of Time To File Certain Employee Plan Returns*, may be used to file for a one-time extension for the Form 8955-SSA. Plan administrators are granted an automatic extension of time to file Form 8955-SSA (without filing a Form 5558) until the due date of the federal income tax return of the employer if certain conditions are satisfied (see Part II of the General Instructions to the Form 5558).

The IRS has a website dedicated to the Form 8955-SSA with the heading "Form 8955-SSA Resources." The webpage contains links to:

- The Form 8955-SSA and instructions
- Blank prior-year form and instructions
- The Form 5558, *Application for Extension of Time to File Certain Employee Benefit Returns*
- Information on late filings and penalties
- The Filing Information Returns Electronically (FIRE) system
- The address to mail the Form 8955-SSA
- A link to information about permitted private delivery services and a street address to send the Form 8955-SSA

- Frequently Asked Questions concerning the Form 8955-SSA
- Official guidance

The webpage is located at: http://www.irs.gov/Retirement-Plans/Form-8955-SSA-Resources.

The Form 8955-SSA filing is independent of the Form 5500/5500-SF filing. The plan sponsor/administrator should generally file the form as soon as it reviews and approves the form. The Form 8955-SSA is filed directly with the IRS's Filing Information Returns Electronically (FIRE) system or with the IRS on paper. Plan sponsors/administrators can electronically file the Form 8955-SSA through Web Client, which submits the filing through the IRS FIRE system.

IRS regulations require that plan administrators that are required to file at least 250 returns for the calendar year must file the Form 8955-SSA electronically. Please note that a late Form 8955-SSA must be filed on paper if the plan sponsor intends for it to take advantage of the DOL's Delinquent Filer Voluntary Correction Program.

A plan sponsor/administrator will be treated as being required to file at least 250 returns during a plan year if the plan sponsor is required to file at least 250 returns of any type. The types of returns that are counted include information returns (for example, Forms W-2 and 1099-R), income tax returns, employment tax returns, and excise tax returns.

For purposes of determining whether 250 returns were required to be filed, the filer that is taken into account is the plan administrator. If the plan administrator is the employer, then the employer includes the members of the controlled group of corporations that include the employer. Merrill will not monitor the number of returns or whether a plan sponsor/administrator may file on paper as that is a plan sponsor responsibility. For more information on the Form 8955-SSA, please see the Form 8955-SSA booklet that is posted on Benefits OnLine®.

Your planbook

Compiling your planbook

Each year the Merrill Retirement Regulatory Services & Operations team compiles the Form 5500 series planbook for our clients. Information is used from the prior year 5500 filing, the revalued trust statement, and the Form 5500 and 8955-SSA Questionnaire. Data is mapped to the required forms and schedules within the Form 5500 series planbook from these documents. A validation is performed to ensure the required fields are completed and that the financial information on the forms are in balance.

Providing your Important Notice

Merrill creates an *Important Notice* that is specific to your plan's filing based on the responses on the forms, the forms included in the planbook, as well as the specific data on the forms included. In addition, the *Important Notice* advises of the filing deadlines that pertain to your plan. The *Important Notice* is included as an attachment to your planbook and should be reviewed, especially the information under the "Special Instruction" section that highlights specific actions you will need to take regarding the Form 5500/5500-SF and/or Form 8955-SSA.

Publishing your planbook

When your planbook has been compiled, Merrill will publish your planbook to Web Client. All plan contacts identified in the planbook will receive two emails the first time the planbook is published: one will contain your Web Client user ID and the link to Web Client, and the second will contain your Web Client password. After gaining access to Web Client, you will have the ability to view, edit, print, and finally file your forms. More information about this process is available in the "Navigating Web Client" section in this manual.

When to file

Unextended filing date

All required forms, schedules, statements, and attachments must be filed by the last day of the seventh calendar month after the end of the plan year unless the filing deadline has been extended.

Extended filing date

A plan may obtain a one-time extension of time to file a Form 5500/5500-SF annual return/report (up to 2½ months) by filing IRS Form 5558, on or before the normal due date (not including any extensions) of the return/report.

An automatic extension of time to file the Form 5500/5500-SF filings until the due date of the federal income tax return of the employer will be granted if all the following conditions are met:

1. The plan year and the employer's tax year are the same;
2. The employer has been granted an extension of time to file its federal income tax return to a date later than the normal due date for filing the Form 5500; and
3. A copy of the application for extension of time to file the federal income tax return is maintained with the filer's records. An extension granted by using this automatic extension procedure CANNOT be extended further by filing a Form 5558 after the normal due date, nor can it be extended beyond a total of 9½ months beyond the close of the plan year.

Filing due date falls on a Saturday, Sunday, or federal holiday

If the filing due date falls on a Saturday, Sunday, or federal holiday, the return/report may be filed on the next day that is not a Saturday, Sunday, or federal holiday.

Short plan year

For a plan year of less than 12 months (short plan year), file the form and applicable schedules by the last day of the seventh calendar month after the short plan year ends or by the extended due date, if filing under an authorized extension of time. Fill in the short plan year beginning and ending dates in the space provided and check the appropriate boxes in Part I, line B, of the Form 5500. For purposes of this return/report, the short plan year ends on the date of the change in accounting period or upon the complete distribution of assets of the plan. Also see the instructions for Final Return/Report to determine if "the final return/report" box in line B should be checked. The Form 8955-SSA does not have a similar box to check.

Information about a short plan year must be reported on the Form 5500/5500-SF report and Form 8955-SSA and the short plan year impacts when a Form 5500/5500-SF report and a Form 8955-SSA must be filed. Short plan years may also impact when an audit is required.

The Form 5500/5500-SF report and Form 8955-SSA filings are due for a short plan year by the last day of the seventh calendar month after the short plan year ends or by the extended due date (if filing under an authorized extension of time).

Forms not yet available**:** As there is no exception to the filing deadline for short plan years (the last day of the seventh month after the end of the plan year, plus a 2½ month extension for Form 5500/5500-SF and Form 8955-SSA), a plan sponsor may find that the appropriate form for filing is not yet available. If the filing required for a short plan year is due before the form is available for the filing, use the most recent form and enter the applicable plan year beginning and ending dates on the line provided at the top of the form.

A plan administrator is not required to include the report of an independent qualified public accountant in the Form 5500/5500-SF annual report for the first of two consecutive plan years, one of which is a short plan year, provided that certain conditions are satisfied.

Example: Short plan year July 1, 2024, to December 31, 2024, followed by a plan year January 1, 2025, through December 31, 2025. The plan can defer the audit until required for the plan year ending December 31, 2025.

Example: Plan year July 1, 2024, to June 30, 2025, followed by a short plan year July 1, 2025, through December 31, 2025. The plan can defer the audit until required for the plan year ending December 31, 2025.

A short plan year for purposes of deferring an audit means a plan year of seven or fewer months' duration that occurs as a result of:

1. A plan is established or commences operations;
2. A plan is merged or consolidated with another plan or plans;
3. A plan is terminated; or
4. The annual date on which the plan year begins is changed.

In order for the accountant's opinion to be deferred, the annual report for the first of the two consecutive plan years must include:

- Financial statements and accompanying schedules;
- An explanation why one of the two plan years is of seven or fewer months' duration; and
- A statement that the annual report for the immediately following plan year will include a report of an independent qualified public accountant with respect to the financial statements and accompanying schedules for both plan years.

In addition, the annual report for the second of the two consecutive plan years must include:

- Financial statements and accompanying schedules with respect to both plan years;
- A report of an independent qualified public accountant with respect to the financial statements and accompanying schedules for both plan years; and

- A statement identifying any material differences between the unaudited financial information relating to, and contained in the annual report for, the first of the two consecutive plan years and the audited financial information relating to that plan year contained in the annual report for the immediately following plan year.

The examination by the accountant which serves as the basis for the portion of his report relating to the first of the two consecutive plan years may be conducted at the same time as the examination which serves as the basis for the portion of the report relating to the immediately following plan year.

Final return/report

If all assets under the plan (including insurance/annuity contracts) have been distributed to the participants and beneficiaries or legally transferred to the control of another plan, the final return/report box in Part I, line B, at the top of the Form 5500/5500-SF should be checked. The final return/report box should not be checked if there are reporting participants and/or assets at the end of the plan year. A final return/report may occur on account of a plan merger or plan termination and could result in a short plan year.

Plan mergers

Information on plan mergers must be reported on the Form 5500/5500-SF. For the plan that is merged into another plan, a final Form 5500/5500-SF must be filed for the plan year (12 months or less) that ends when all plan assets were legally transferred to the control of another plan. Merrill is not responsible for compiling the final Form 5500/5500-SF filing of the plan that is merged into another plan if Merrill was only the recordkeeper of the surviving plan. In addition, the financial statements for the receiving plan should show the amount that was transferred in, and the financial statements for the plan that is transferring amounts to another plan should show the amounts going out. For more information on plan mergers, see the Retirement Compliance Services booklet on Mergers & Acquisitions on Benefits OnLine®.

Plan terminations

A terminated plan which has not yet distributed all assets must continue to file a Form 5500/5500-SF for each year the plan has assets and a Form 8955-SSA, if applicable. Once all assets (including insurance/annuity contracts owned by the plan) have been distributed to the participants and beneficiaries or legally transferred to the control of another plan, the final return/report box at the top of the Form 5500/5500-SF should be checked. A final Form 8955-SSA may also need to be filed. Failure to timely file these final forms may subject you to penalties.

The final distribution of assets (at any date other than the last day of the plan year) will result in a short plan year that ends on the date of the complete distribution of assets from the plan. A Form 5500/5500-SF and its schedules, including the Form 8955-SSA, if applicable, must be filed by the last day of the seventh calendar month after the short plan year ends or by the extended due date, if filing under an authorized extension of time.

Example: A calendar year plan terminates on Feb. 28, 2025, and distributes all assets in October 2025. The final Form 5500 must be filed by June 1, 2026, unless timely extended using the Form 5558, in which case the form must be filed by August 15, 2026.

Information to include in your reporting

Reporting plan sponsor/administrator information

Both the Form 5500/5500-SF filings and the Form 8955-SSA report information about the plan sponsor and the plan administrator. The nine-digit employer identification number (EIN) assigned to the plan sponsor/employer, for example, 00-1234567 must be reported on the form. A Social Security number may not be used in lieu of an EIN because the Form 5500 is open to public inspection, and the contents are public information and are subject to publication on the Internet. Because of privacy concerns, the inclusion of a Social Security number or any portion thereof on this line may result in the rejection of the filing. Employers without an EIN must apply for one as soon as possible from the IRS.

Other basic information that must be included on the Form 5500 include the plan sponsor's name, mailing address, city or town, state or province, country, and ZIP or foreign postal code.

The plan sponsor's six-digit business code that best describes the nature of the plan sponsor's business from the list of business codes in the Form 5500 instructions (see also Exhibit 1) is entered. If more than one employer or employee organization is involved, the business code for the main business activity of the employers and/or employee organizations must be entered.

Name and EIN changes

A change in the plan sponsor name, EIN, or the three digit plan number will have a significant impact on reporting and disclosure because filings are based upon the plan sponsor's name, EIN, and three-digit plan number. This includes Form 5500 /5500-SF filings, Form 8955-SSA and Form 5558, Application for Extension of Time to File Certain Employee Plan Returns. It is important for plan sponsors to timely notify Merrill about any name or EIN changes that occurred in the plan year subject to annual reporting so that the correct information is consistently reported on Form 5558, Form 8955-SSA, and the Form 5500/5500-SF filing.

The name and address of the plan administrator must be entered unless the administrator is the plan sponsor. If both the plan administrator name and address are the same as the plan sponsor name and address, the "Same as Plan Sponsor" box should be checked. The employees of the plan sponsor who perform administrative functions for the plan are generally not the plan administrator unless specifically designated in the plan document. If an employee of the plan sponsor is designated as the plan administrator, that employee must get an EIN.

Reporting plan information

Both the Form 5500/5500-SF filings and the Form 8955-SSA report information about the plan. The plan name, plan year, and EIN on the Form 5500/5500-SF filings should match the plan name and EIN on the Form 8955-SSA report that is filed for the plan and what is reported on the Form 5558 extension. The Form 5500 instructions state to enter the formal name of the plan or enough information to identify it. The instructions provide that if an annual return/report has previously been filed on behalf of the plan, regardless of the type of form that was filed (Form 5500, Form 5500-EZ, or Form 5500-SF) the same name or abbreviation should be used as on the prior filings. Once an abbreviation is used, it should continue to be used for that plan on all future annual return/report filings with the IRS, DOL, and PBGC. Do not use the same name or abbreviation for any other plan, even if the first plan is terminated.

The instructions state to enter the three-digit plan or entity number (PN) the employer or plan administrator assigned to the plan. This three-digit number, in conjunction with the employer identification number (EIN) entered on line 2b, is used by the IRS, DOL, and PBGC as a unique 12-digit number to identify the plan or DFE. Start at 001 for plans providing pension benefits, plans providing pension and welfare benefits, or DFEs as illustrated in the table below. Start at 501 for plans providing only welfare benefits and GIAs. Do not use 888 or 999.

Once you use a plan or DFE number, continue to use it for that plan or DFE on all future filings with the IRS, DOL, and PBGC. Do not use it for any other plan or DFE, even if the first plan or DFE is terminated.

Reporting financial information

The cash, modified cash, or accrual basis may be used for reporting:

- Assets and liability statement in Part I of the Schedule H for large plans
- The income and expense statement in Part II of the Schedule H for large plans
- Financial information for small plans using Schedule I
- Recognition of transactions for small plans using the Form 5500-SF

Merrill's default methodology is to report on a cash basis, unless instructed otherwise.

All amounts reported on the Schedule I are rounded off to the nearest dollar. Any other amounts are subject to rejection.

Reporting compliance information

Plans that file the Form 5500/5500-SF reports must answer the required compliance questions with either "Yes" or "No." Do not leave any answer blank, unless otherwise directed. For several of the items, if the answer is "Yes," an amount must be entered. Merrill has compiled responses to these questions based on the information that we received on the Forms 5500/8955-SSA Questionnaires that were returned.

Audit considerations

Neither the IRS nor DOL have released an official list of specific responses or information on the Form 5500/5500-SF that will generate an examination. However, at a past ASPPA/IRS conference, an IRS official identified the following four situations that might result in additional scrutiny:

1. Line items that are left blank when the instructions require an answer.
2. Inconsistencies in the data disclosed on the Form 5500 schedules.
3. A large drop in the number of participants from one year to the next (for example, more than 20%).
4. A large dollar amount in the "Other" asset line on the Schedule H (unless the plan reports that it has brokerage accounts by reporting Code 2R).

Supporting information you should consider

Plan audit package

Each year our Trust Statement Team provides you (to provide to your auditor) with a plan audit package, which incorporates various documents that may be used to assist in compiling your Form 5500/5500-SF planbook. This information is sent to you approximately two months after your plan year-end. These documents include your annual revalued statement, Q6 summary report, Schedule H mapping document and a list of frequently asked questions (FAQs) that address key points regarding the Form 5500/5500-SF and how the information is presented within your Form 5500 planbook. The Schedule H mapping document contains the specific details from your annual revalued statement and how that information is mapped to the Schedule H within your Form 5500 planbook. In addition, the Schedule H, Schedule I, and Form 5500-SF mapping documents are included as exhibits at the end of this manual. Should you have any questions regarding the information provided in your plan audit package, please contact your assigned CSM or email one of our Retirement Services consultants at RGCompliance.Consulting@bofa.com.

SSAE No. 18

The *Statement on Standards for Attestation Engagements 18* (SSAE No. 18) replaced the SSAE No. 16, effective for reports issued after May 1, 2017. The SSAE 18 report describes certain controls and processes over those transactions processed by Merrill Lynch, Pierce, Fenner & Smith Inc. ("MLPF&S") Retirement Services' 401(k) Plan Recordkeeping and Trust Services system for processing user entities' transactions. According to PricewaterhouseCoopers LLP, this report is intended to provide user entities and the independent auditors of such user entities, with information about the control structure as it relates to the execution of key processes by the 401(k) Plan Recordkeeping and Trust Services system and management. This report has been prepared in accordance with the guidance established by the American Institute of Certified Public Accountants ("AICPA"), specifically, prepared in accordance with AT-C 320, titled *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting, of Statement on Standards for Attestation Engagements 18*.

The report is structured into five main sections:

- Section I contains the Report of Independent Service Auditors, PricewaterhouseCoopers LLP.
- Section II contains Merrill Lynch, Pierce, Fenner & Smith Inc. Retirement Services' Assertion.
- Section III provides an overview of Merrill Lynch, Pierce, Fenner & Smith Inc. Retirement Services' 401(k) Plan Recordkeeping and Trust Services system, business segments and operations, as well as key applications and processes covered in this report.
- Section IV contains the Control Objectives, Control Activities, PricewaterhouseCoopers' Tests of Operating Effectiveness and Results of Tests and details the control objectives and related controls of Merrill Lynch, Pierce, Fenner & Smith Inc. Retirement Services.
- Section V contains Other Information Provided by Merrill Lynch, Pierce, Fenner & Smith Inc. Retirement Services, which provides information relating to Business Continuity Planning controls and processes.

For the purpose of this report, client accounts are limited to the clients of MLPF&S Retirement Services' 401(k) Plan Recordkeeping and Trust Services system. The report on MLPF&S Retirement Services' 401(k) Plan Recordkeeping and Trust Services system and on the suitability of the design and operating effectiveness of its controls throughout the period October 1, 2022, to September 30, 2023, is confidential. The report is intended solely for use by the management of MLPF&S Retirement Services, its user entities, and the independent auditors of its user entities.

Investments at contract value

Although most investment funds are reported on the trust statement at fair market value, there can be plan investments that are reported at contract value. For example, some Common Collective Trusts (CCT) are reported at contract value. Even though an investment is reported at contract value, the Form 5500/5500-SF must report fair market value and a plan's auditors will reflect fair market value in the financials. In order to facilitate this reporting, the applicable fund, in its annual statement, will generally provide a conversion factor to convert contract value to fair market value. Our default for non-proprietary CCTs is to not make any adjustment to reported fair value unless instructed by the plan sponsor/administrator or its auditor.

Annual and revalued trust statements

The annual statement is the trust statement provided in the audit package. The revalued statement is generally the annual statement revalued to provide the realized and unrealized gains/losses on a current year basis. Realized and unrealized gain/loss for an investment is the difference between the market value and the cost.

The annual statement calculates the realized or unrealized gain/loss as the difference between the cost when the investment was first purchased (historical cost) and its market value at either:

- The end of the plan year, or
- If the investment was sold during the plan year, the market value when it was sold.

The revalued statement calculates the gain/loss as the difference between the investment's market value as of the first day of the plan year and its market value at either:

- The end of the plan year, or
- If the investment was sold during the plan year, the market value when it was sold.

Employer Plan Annual Revenue Information Report

Approximately 3½ months after plan year-end, Merrill mails the *Employer Plan Annual Revenue Information Report* directly to clients. This report includes information about fees and revenue that have been paid directly and indirectly from the plan to Merrill and certain other service providers. This information may need to be included on the Schedule C. If Merrill is compiling your Form 5500/5500-SF, we will use the information contained in this report to complete Schedule C (if it is required). If Merrill is not compiling your Form 5500/5500-SF, you should share this report with your Form 5500/5500-SF preparer. You will also receive a disclosure document with this report.

Merrill provides detailed disclosures about the indirect compensation it receives in order for it to qualify as eligible indirect compensation to the extent applicable. By providing this detailed disclosure information, plan sponsors are eligible for simpler reporting and will not be required to provide the more detailed reporting of compensation that generally applies to indirect compensation. Plan sponsors that have service providers with indirect compensation that is not eligible indirect compensation must answer additional questions on the Schedule C that describe in greater detail the indirect compensation including the total amount of indirect compensation.

Participant statement

The instructions to the Form 8955-SSA require that plan administrators who are required to report a participant on the Form 8955-SSA must also provide a participant statement (also referred to as the "registration statement") by the deadline for filing the Form 8955-SSA. To meet the participant statement requirements, the statements or other documentation issued to the participants must include the following information:

- Name of the plan
- Name and address of the plan administrator
- Name of the participant
- Nature, amount, and form of the deferred vested benefit to which such participant is entitled

Merrill helps plan sponsors who use Merrill Lynch's recordkeeping services with furnishing the statement to separated participants with deferred vested benefits by including the following language in participant statements:

> **Participants with Deferred Vested Benefits**
> If you separate from service without taking a distribution of a deferred vested benefit, your plan's administrator is required to report information about this benefit on IRS Form 8955-SSA. This information allows the Social Security Administration to alert those filing for Social Security benefits of any employer-plan benefits available to them. For information about the nature and form of your deferred vested benefit and the name and address of your plan administrator, please see your plan's Summary Plan Description.

The IRS also stated that a separate statement designed specifically to satisfy this requirement is not required. See http://www.irs.gov/Retirement-Plans/FAQs-Regarding-Form-8955-SSA-What-are-the-Requirements-for-Answering-Yes-to-Question-8-on-Form-8955-SSA.

How to file

Electronic filing requirements

All retirement plans subject to Title I of ERISA are required to submit annual return/reports (Form 5500 or Form 5500-SF) electronically through the ERISA Filing Acceptance System II (EFAST2) and plans that are required to report participants with deferred vested benefits are generally to file the Form 8955-SSA to report that information electronically through the IRS Filing Information Returns Electronically (FIRE) system.

Merrill assists its clients for whom we compile Form 5500/5500-SF and/or Form 8955-SSA with electronic filing by providing approved third-party software with file sharing functionality. This allows different people to work on a single planbook in a coordinated and streamlined manner. Merrill compiles annual reports using its EFAST2- and FIRE-approved software, Web Client, for plan administrators to submit via the Internet. These filings must be electronically signed by an individual authorized to sign as plan administrator. The IRS has clarified that even when the plan administrator is an entity, the electronic signature must be the name of a person authorized to sign on behalf of the plan administrator.

The IRS provides the FIRE system to file the Form 8955-SSA electronically. When filing electronically, plan administrators must file Form 8955-SSA with the IRS and not through the EFAST2 filing system because EFAST2 filings are posted on the Internet and the Form 8955-SSA includes Social Security numbers of participants, which cannot be posted on the Internet due to privacy concerns.

Filings that need to be made during a period when the FIRE system is not available should be extended (if an extension is available) or filed on paper, if applicable. For more information about FIRE system availability, see *https://www.irs.gov/e-file-providers/filing-information-returns-electronically-fire*.

Navigating Web Client

When your planbook has been published to Web Client for the first time, an email notification will be sent to all plan contacts identified by the plan sponsor in Web Client, informing them of their Web Client username and password to access the planbook. The plan sponsor should view all the forms and attachments that were published to Web Client.

For a small-plan filing, this includes the Form 5500-SF, the 5500-SF mapping document, the *Important Notice*, and the Form 8955-SSA, if applicable. For a large-plan filing, this includes the Form 5500; Schedules C, H, and R; Schedule H mapping document; Important Notice; Statement of Assets; and, if applicable, Schedules A, D, and G, and Form 8955-SSA.

Viewing, editing, and printing your planbook

To view, edit, or print your planbook, log into Web Client using your Web Client username and password. After logging in, the Plan Selection page appears. From there, select the appropriate planbook (ensuring that the correct form year is displayed in the upper-right corner). After you select a planbook, the Plan Summary page appears. There are options to view and print your planbook. There are also additional instructions on each of the pages within Web Client to guide you through each step in the process.

The plan sponsor and/or its auditor (if included as a contact) has access to make changes to the forms and schedules directly on Web Client. There is no need to document changes and send them to Merrill to update. The online editing interface is easy to use and provides real-time updates.

When the plan sponsor or auditor has finished reviewing and making any edits to the Form 5500 series planbook, that person should click the "Review Complete" link on the Plan Summary page. This alerts Merrill that the forms are ready to be validated and, if all validations are successful, that the filing capabilities may be enabled for the Form 5500/5500-SF and the Form 8955-SSA, if applicable.

The plan sponsor and all plan contacts will receive an email once the filing capabilities have been enabled so they know that their forms are ready to be filed.

Electronic filing on Web Client

Accessing the filing

The individual who will sign the form should log into Web Client using their Web Client username and password. After logging in and selecting the planbook, the Plan Summary page appears.

EFAST2 attachments

EFAST2 attachments are those EFAST2 has indicated to be required based on information entered on the Form 5500 and schedules. All EFAST2 attachments will be included with the filing during the e-file process. To add an EFAST2 attachment, click the "View Plan" link from the Plan Summary page. On the View Plan page, click the "Add New EFAST Attachment" link. Choose from the list of predefined attachment types by selecting anywhere in the row or by clicking on the box to the left. Click the "Choose File" button to select the file to add from your network or local drive, then click the "Upload" button to add the attachment. You may need to repeat for multiple attachments.

EFAST2 attachments that have been added through the 5500 Web Client system can be viewed, updated or deleted as necessary.

Accountant's Opinion (EFAST2 attachment)

For large-plan filings, the Accountant's Opinion is a required attachment for the filing and must be attached to the planbook prior to filing. To attach the Accountant's Opinion, click the "View Plan" link from the Plan Summary page. On the View Plan page, click the "Add New EFAST Attachment" link. Click the box for "5500 Sch. H, Part III, Accountant's Opinion." Click the "Choose File" button to select the file to add from your network or local drive, then click the "Upload" button to add the attachment.

Important note: Your Accountant’s Opinion must be added as an EFAST2 attachment. It must be in a PDF format, unsecured, and not password protected.

Other attachments

"Other" attachments are files that can be added that are not listed under the EFAST2-specific attachments; for example, adding a file with background financial information, an SAR, or a privacy policy. To add an "Other" attachment, click the "View Plan" link from the Plan Summary page. On the View plan page, click the "Add Other Attachment" link. Select the file, if applicable, from the dropdown list. Include the item number of the form if desired. Then enter a description of the file being uploaded. Click "Choose File" to locate the file to add from your network or local drive and click "Upload" to add the attachment. You may need to repeat for multiple attachments.

You can select to include other attachments when e-filing by selecting the "Include in EFAST E-Filing" checkbox for the desired attachment. Other attachments that have been added can be viewed, updated or deleted as necessary.

Filing Form 5500

The Form 5500/5500-SF can be filed by clicking the "File EFAST Forms" link from the E-File panel on the Plan Summary page in Web Client. The Form 5500/5500-SF is filed with the DOL. The process to file is described below.

1. After clicking the "File EFAST Forms" link on the Plan Summary page, the forms and attachments that are included in the filing are listed. Before filing, the plan sponsor/signer should review the forms one final time prior to filing to ensure that the forms are correct. The attachments may also be viewed from this page, and any additional attachments that need to be added or deleted may be done from this page. When you are ready to proceed, click the Next button.
2. The validation process begins. If there are any errors or warnings with the filing, they will be displayed. If there are errors or warnings with the filing, do not proceed. Reach out to your assigned Client Service Manager to assist. Once you have reviewed all warnings and corrected all errors, click OK to continue.
3. The signature page appears. The authorized signer should enter their name, EFAST2 user ID and PIN, and date. The authorized signer must sign under the "Administrator Signature" section. You may also choose to have the plan sponsor sign under the "Employer/Plan Sponsor" section, but this is not required.
4. Click the "Agree and Transmit" button to file the Form 5500/5500-SF.

Filing Form 8955-SSA

The Form 8955-SSA can be filed from the Plan Summary page in Web Client. The Form 8955-SSA is filed with the IRS. The process to file is described below.

1. After clicking the "File 8955-SSA" link from the E-File panel on the Plan Summary page, the Form 8955-SSA is displayed. The plan sponsor/signer should review the form one final time prior to filing. When you are ready to proceed, click the Next button.
2. The validation process begins. If there are any errors or warnings with the filing, they will be displayed. If there are errors or warnings with the filing, do not proceed. Reach out to your assigned Client Service Manager to assist. Once you have reviewed all warnings and corrected all errors, click OK to continue.
3. Click the "Transmit" button to electronically submit the Form 8955-SSA to the IRS's FIRE system.

Filing statuses

There are multiple statuses for the Form 5500/5500-SF and the Form 8955-SSA once the filing has been submitted. If either the Form 5500 or the Form 8955-SSA is not successfully filed, Merrill will be notified, and will reach out to the assigned Client Service Manager and the client to work with them to correct the filing error.

Form 5500 filing statuses

- **Amendment in Progress** indicates that the Preparer or Client selected the Amend(5500) link and the Amended Filing box was selected on the 5500.
- **Submitted** status indicates the file has been signed and submitted to the Department of Labor using E-File.

- **Filing Received** status indicates EFAST2 either found no errors or only identified possible errors in the annual return/report information provided by the filer. If corrections are warranted, they should be made and the corrected filing resubmitted in its entirety as an amended filing. NOTE: You must check the status details, as a plan could be returned with a status of Filing Received and still have warnings. For example, the plan was filed after the filing deadline but the filing is correct.
- **Processing** status indicates EFAST2 is currently trying to read and process each of the annual return/reports in the submission. Annual return/reports should not remain in this status for more than 20 minutes.
- **Processing Stopped** status indicates EFAST2 could read the annual return/report but could not fully check the filing for errors because crucial information was not provided by the filer. The annual return/report must be corrected and resubmitted in its entirety as an amended filing.
- **Submission Failed** status indicates there was a problem during transmission of the filing to EFAST2. The filing will automatically be re-sent to EFAST2 soon.
- **Filing Stopped** status indicates EFAST2 could read the annual return/report but could not fully check the filing for errors because crucial information was not provided by the filer. The annual return/report must be corrected and resubmitted in its entirety as an amended filing.
- **Filing Error** status indicates EFAST2 discovered errors in the annual return/report information provided by the filer. The annual return/report must be corrected and resubmitted in its entirety as an amended filing.
- **Filing Unprocessable** status indicates EFAST2 could not read the annual return/report. The annual return/report is not considered filed with the Government.
- **Unknown EFAST Error** indicates EFAST has delayed the filing. It will automatically be resubmitted.

Form 8955-SSA filing statuses

- **Not Filed** status indicates a Form 8955-SSA has been published to Web Client, but has not been filed.
- **Submitted** status indicates the file has been signed and submitted to the IRS through the FIRE system.
- **Submission Failed** status indicates an error was encountered. Contact Merrill for assistance.
- **Filed** status indicates the IRS has received the Form 8955-SSA and is reviewing it. To verify the final status, the Preparer will need to access the FIRE system.

EFAST2

Registering as an EFAST2 user

Plan administrators (who have not already registered) must obtain EFAST2 electronic credentials to sign and submit Form 5500/5500-SF filings from the Department of Labor by registering on the EFAST2 website at www.efast.dol.gov. Individuals who have already obtained EFAST2 credentials should continue to use the same filing credentials that they used in the prior year unless their email address changed. The credentials provided are intended to be used for multiple years and on multiple filings.

The plan sponsor/administrator must register as a "Filing Signer" to sign the return and as a "Transmitter" if the plan sponsor is going to transmit the return under IFILE. The categories Transmitter, Filing Author and Schedule Author do not apply for filers who use Merrill to compile the Form 5500 or 5500-SF using our EFAST2-approved software. A plan sponsor/administrator does not need to register separately as "Employer/Plan Sponsor" and "Plan Administrator" if the employer/plan sponsor and the plan administrator are the same.

Individuals who need to register should access the EFAST2 website located at www.efast.dol.gov. On the navigation panel on the left side of the Welcome page, the user should click the "Register" link, then click the "Register Now" link on the page that appears, and then complete the following steps:

1. Read and accept the privacy statement.
2. Enter profile information and select the user type "Filing Signer."
3. Select a challenge question and provide an answer.
4. Verify the registration information shown on the summary page, which lists the registration information that was entered.
5. Retrieve and activate credentials by following the instructions in the email notification you will receive.
6. Accept applicable agreements.
7. Create a password.

Updating electronic credentials

Individuals may need to change their profile information, including the type(s) that are associated with their user ID. This can be accomplished though the following steps:

1. Log in to www.efast.dol.gov.
2. Select "User Profile."
3. On the resulting User Profile page, select "Change Profile."
4. After updating information, click "Submit."

The EFAST2 system does not allow changes to answers provided by a challenge question. Also, the EFAST2 user ID cannot be changed for an established account because it is a unique, system-generated ID. Although a user ID cannot be changed, according to the EFAST2 User Guide, if users wish to revoke their registration and re-use the same email address, they will need to contact the EFAST2 Contact Center at 1-866-463-3278 (1-866-GOEFAST). Users can then revoke their current account and free up their email address. If a user registers for a new user ID, the user will no longer have access to filings created or signed using their original user ID.

Signing a return

To sign Form 5500/5500-SF filings, plan administrators must obtain EFAST2 electronic credentials from the DOL by registering on the EFAST2 website (www.efast.dol.gov). The plan sponsor/administrator must register as a Filing Signer to sign the return.

Special situations

Selecting an auditor

Employee benefit plan audits have unique audit and reporting requirements and are different from other financial audits. According to the Department of Labor (DOL), a quality audit will help protect the assets and financial integrity of a plan and help to ensure that the necessary funds will be available to pay the benefits promised to plan participants and their beneficiaries. It also helps make sure a plan is in compliance with the law and will help avoid penalties.

According to the DOL, it is important to inquire whether an auditor is qualified. Care should be taken by the plan administrator to select an independent Certified Public Accountant (CPA) who possesses the requisite knowledge of plan audit requirements and expertise to perform the audit in accordance with professional auditing standards.

A plan administrator can evaluate the qualifications of a CPA firm to perform a plan audit by considering the following factors:

- The number of employee benefit plans the CPA audits each year, including the types of plans;
- The extent of specific annual training the CPA received in auditing plans;
- The status of the CPA's license with the applicable state board of accountancy;
- Whether the CPA has been the subject of any prior DOL findings or referrals, or has been referred to a state board of accountancy or the American Institute of CPA's for investigation; and
- Whether or not the CPA's employee benefit plan audit work has recently been reviewed by another CPA (this is called a "Peer Review") and, if so, whether such review resulted in negative findings.

A plan sponsor/administrator can find detailed information and tips for selecting an auditor in the DOL's pamphlet "Selecting an Auditor for Your Employee Benefit Plan" at: https://www.dol.gov/sites/default/files/ebsa/about-ebsa/our-activities/resource-center/publications/selecting-an-auditor-for-your-employee-benefit-plan.pdf.

Amendments to filings

Form 5500/5500-SF filings may be amended to correct errors and/or omissions in a previously filed annual return/report. The amended Form 5500/5500-SF filing and any amended schedules and/or attachments must conform to the requirements in the instructions. See the DOL website at www.efast.dol.gov for information on filing amended returns/reports for prior years. Penalties generally do not apply to Form 5500/5500-SF filings that are amended.

An amended 2025 Form 8955-SSA should be filed to correct errors and/or omissions in a previously filed statement for the 2025 plan year. The box for Part I, line B ("amended registration statement"), should be checked. The amended Form 8955-SSA must conform to the requirements in the "How to File" section. A full and complete Form 8955-SSA must be filed to correct any such errors and/or omissions.

If a plan sponsor amends a Form 8955-SSA that was filed timely, the IRS could impose penalties for an incomplete filing as a result of the information reported on the amended filing. If a filing is amended to include additional individuals who terminated employment with deferred vested benefits who should have been coded as an A, the IRS may apply a penalty of $10 for each participant not reported for each day multiplied by the number of days up to a $5,000 maximum.

If the failure to report was for a period in which the plan was not recordkept by Merrill, the plan sponsor may also have failed to furnish a statement to the separated participant about the participant's deferred vested benefit. If the required statement was not furnished, the IRS could also impose a penalty of $50 on the person required to furnish the statement to each affected participant for each willful failure to furnish the statement or a willful furnishing of a false statement. For non-recordkept plans, we should recommend that they address the issue with their legal counsel prior to amending to ensure that they have properly addressed any requirements related to the amended filing, such as the requirement of providing a statement to participants.

A late filing penalty of $250 per day under § 6652(e) applies to the failure to file a required return or statement, including Form 8955-SSA, on the date and in the manner prescribed.

Delinquent Filer Voluntary Compliance Program

When a Form 5500/5500-SF is not filed in a timely manner, the Delinquent Filer Voluntary Compliance Program (DFVCP) of the DOL may be utilized to limit the monetary penalties imposed on a plan administrator for the untimely filing of Form 5500/5500-SF. The DFVCP is designed to encourage voluntary compliance with the annual reporting requirements under the Employee Retirement Income Security Act of 1974, as amended (ERISA). The DFVCP gives delinquent plan administrators a way to avoid potentially higher civil penalties by satisfying the program's requirements and voluntarily paying a reduced penalty amount.

Eligibility for the DFVCP is limited to plan administrators with Form 5500/5500-SF filing obligations who comply with the provisions of the program and who have not been notified in writing by the DOL of a failure to timely file an annual Form 5500/5500-SF.

Participation in the DFVCP involves first filing the complete Form 5500/5500-SF with the DOL, including all schedules and attachments, for each year relief is requested. To ensure proper processing, the "DFVC program" box on line D of Part I of the Form 5500 or 5500-SF must be checked. Then the filer must electronically submit the filing information and payment to the DFVCP using the DFVCP calculator at https://www.askebsa.dol.gov/dfvcepay/calculator. Filers may also submit their payment and filing information to the DFVCP through the mail. Regardless of which payment method is used, the submission of the payment should be completed promptly after the electronic filing of the delinquent Form 5500/5500-SF, as the requirements of the DFVCP are not complete until both actions are completed.

The plan administrator is liable for the applicable penalty amount, and, therefore, amounts paid under the DFVCP may not be paid from the assets of an employee benefit plan.

The basic penalty under the program is $10 per day for delinquent filings. The maximum penalty for a single late annual report is $750 for a small plan (generally a plan with fewer than 100 participants with account balances at the beginning of the plan year) and $2,000 for a large plan. The DFVCP also includes a "per plan" cap. This cap is designed to encourage reporting compliance by plan administrators who have failed to file an annual report for a plan for multiple years. The "per plan" cap limits the penalty to $1,500 for a small plan and $4,000 for a large plan regardless of the number of late annual reports filed for the plan at the same time. If a plan was a large plan for any year for which a delinquent filing is being corrected under the DFVCP, the penalty cap that applies is the $4,000 cap for large plans, even if for all other years the plan was a small plan. Special rules apply to small plans that are sponsored by a Code §501(c)(3) tax-exempt organization (including a Code §403(b) plan).

The DOL website provides an online tool to help filers determine which versions of Form 5500/5500-SF and schedules to use when filing delinquent annual reports or amending prior-year annual reports under EFAST2. Filers enter the beginning date of the plan year for which the late filings are made and the tool identifies the correct versions of the Forms 5500/5500-SF to use. The instructions for the Form 5500 Version Selection Tool can be found at: https://www.dol.gov/agencies/ebsa/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/form-5500/version-selection-tool-instructions. The Form 5500 Version Selection Tool can be found at: https://www.askebsa.dol.gov/FormSelector.

The DOL provides links to the final rule, a fact sheet, helpful FAQs, a penalty calculator, and online payment at: https://www.dol.gov/agencies/ebsa/employers-and-advisers/plan-administration-and-compliance/correction-programs.

The DFVCP also impacts IRS penalties for late Form 5500 filings. The IRS extends the penalty relief for failure to file a Form 5500/5500-SF return if the plan sponsor files under DFVCP and filed timely the applicable Form 8955-SSA (or files the delinquent Form 8955-SSA filing on paper no later than 30 calendar days after the DFVCP filing). The Form 8955-SSA must have the box in Part I, line C (Special Extension), checked and "DFVC" entered in the description on line C.

The DFVCP may also impact certain Form 8955-SSA filings. IRS Notice 2014-35 provides penalty relief for late filings of the Form 8955-SSA only if the Form 8955-SSA is filed on paper with the IRS within 30 calendar days after the DFVCP filing. If a plan sponsor corrected a late Form 5500/5500-SF filing for a plan, but separately and filed timely the Form 8955-SSA electronically, the plan sponsor does not need to file a paper version of the Form 8955-SSA in order to meet the new requirements for relief under the guidance. There is no correction program available for a late Form 8955-SSA if the plan sponsor filed timely their Form 5500/5500-SF. However, plan sponsors may seek to have penalties waived or reduced by providing a reasonable cause explanation as to why the Form 8955-SSA filing was late.

The IRS addresses what plans are eligible for relief, requirements for penalty relief and what IRS penalties can be waived at https://www.irs.gov/Retirement-Plans/IRS-Penalty-Relief-for-DOL-DFVC-Filers-of-Late-Annual-Reports.

Penalty letters

The IRS and DOL have become more aggressive in enforcing reporting requirements than they were in the past. Beginning with 2012 plan year-end filings, the IRS began to immediately issue a penalty without providing a warning letter. The process is also much faster as the IRS is sending out penalty letters within days of a filing being considered late, whereas for plan year-end filings prior to 2012, it might take a year or more before plans would get a penalty notice.

If the IRS sends a penalty letter and there are errors in the plan name, address, taxpayer identification number, or plan number, the IRS letter says to provide correct information in the space they provided in its response page of the letter and return it with the payment and response stub provided at the end of the notice. The notice includes a place for correspondence.

The IRS does not specifically address how to correct a penalty assessed in error, but it does provide for the removal of penalties for reasonable cause. It also provides a telephone number 1-877-829-5500 for contacting the IRS for general information. Plan sponsors may want to address what is the best way to respond with their legal counsel.

The IRS sends a CP283C Notice to plan sponsors/administrators to inform them that a penalty is being imposed for failing to properly file the Form 8955-SSA. The IRS will send out a CP283C notice when it determines that it is charging a plan sponsor/administrator a penalty for filing a late or incomplete Form 8955-SSA, *Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits*.

If a plan sponsor/administrator agrees with the penalty notice, the plan sponsor/administrator should send the amount due by the date on your notice to avoid interest charges.

If a plan sponsor/administrator disagrees with the penalty notice, the plan sponsor/administrator should contact the IRS by mail or call 1-877-829-5500. The plan sponsor/administrator should complete the contact form included with the notice, if it is contacting the IRS by mail.

The IRS will consider reducing or removing the penalty if the plan sponsor/administrator sends a signed statement to the address shown at the top of the notice that includes the following:

- The penalty the plan sponsor/administrator would like the IRS to reconsider,
- The reason the plan sponsor/administrator believes the IRS should reconsider the penalty, and
- The name and title of the individual making the request.

The IRS states that it will remove penalties that are based on its erroneous advice if the plan sponsor/administrator:

- Asked the IRS for advice on a specific issue,
- Gave the IRS complete and accurate information,
- Received advice from the IRS, and
- Relied upon the advice and was penalized based on that advice.

A plan sponsor/administrator must request removal of penalties based on erroneous advice from the IRS by submitting a completed claim Form 843, Refund and Request for Abatement, to the IRS service center where the return was filed.

- For a copy of the Form 843, see http://www.irs.gov/pub/irs-pdf/f843.pdf.
- For a copy of the Form 843 instructions, see http://www.irs.gov/pub/irs-pdf/i843.pdf.

The information that Merrill can provide to assist a plan sponsor with responding to a penalty notice for a Form 8955-SSA that was filed timely includes:

- Sample letter to IRS disagreeing with the assessment of penalty
- Copy of the Form 5558 that was timely mailed, if applicable
- Shipment receipt and proof of delivery
- Web Client status history

Plans sponsors/administrators must also include with their response a copy of Notice CP283C with their contact information completed.

Forfeitures

We wish to remind you of fiduciary requirements for the treatment of forfeitures. Your plan document determines how forfeitures are to be used. Forfeitures can be used either to reduce contributions, pay plan expenses and/or be allocated among plan participants. Guidance has been recently released to confirm that all forfeitures are required to be used every year. There can be qualification issues if forfeitures are not applied in a timely manner in accordance with your plan document. If you require assistance in determining your outstanding forfeiture balance, please contact your Client Service Manager.

Consultative support

Our Regulatory Reporting and Operations (RR&O) Department provides consultative support and assistance to you with regards to your Form 5500/5500-SF and Form 8955-SSA filings. Whether the issue involves electronic filing, Schedule C, answering your auditor's questions, or anything else related to the Form 5500/5500-SF filing, our Regulatory Reporting and Operations (RR&O) Department consultants are available to help. Simply contact one of our consultants by sending an email with your question directly to RGCompliance.Consulting@bofa.com. Alternatively, you may contact your Client Service Manager, who will arrange for a conference call with one of our consultants.

Outside assets

If your plan has assets that are not recordkept by Merrill (outside assets), please note that the financial information as compiled in your draft Form 5500 series planbook will include only the financial activity as reported in your Merrill annual trust statement. It is your responsibility as Plan Administrator prior to finalizing your Form 5500 series planbook to revise your Form 5500 series planbook to include any additional financial information applicable to your plan during the plan year. If any of the outside assets are not qualifying plan assets and collectively exceed 5% of the total plan assets, the plan may not qualify for the plan audit waiver. You should consult with your tax adviser as applicable.

Glossary

This glossary contains key definitions applicable to the Form 5500/5500-SF and Form 8955-SSA filings. For more detailed information about the Form 8955-SSA, see the Form 8955-SSA booklet on Benefits OnLine®.

29 CFR 2510.3-102: This is the Department of Labor regulation that specifies when contributions to a plan (whether paid by a participant or withheld from wages) become plan assets. Participant contributions to a pension plan become plan assets at the earliest time they can reasonably be segregated from the general funds of the employer but no later than the 15th business day of the month following the month in which the withholding or receipt by the employer occurs. For plan years ending March 31, 2020, or later, the Department of Labor has issued "Guidance and Relief for Employee Benefit Plans Due to the COVID-19 (Novel Coronavirus) Outbreak" under EBSA Disaster Relief Notice 2020-01 at https://www.dol.gov/agencies/ebsa/employers-and-advisers/plan-administration-and-compliance/disaster-relief/ebsa-disaster-relief-notice-2020-01. Under the relief, the DOL recognized that some employers and service providers may not be able to forward participant payments and withholdings to employee pension benefit plans within prescribed timeframes during the period beginning on March 1, 2020, and ending on the 60th day following the announced end of the National Emergency. In such instances, the DOL will not – solely on the basis of a failure attributable to the COVID-19 outbreak – take enforcement action with respect to a temporary delay in forwarding such payments or contributions to the plan. The DOL stated that "Employers and service providers must act reasonably, prudently, and in the interest of employees to comply as soon as administratively practicable under the circumstances." The National Emergency ended in spring 2023.

Affiliated service group: An affiliated service group is generally comprised of two or more organizations that have a service relationship and, in some cases, ownership relationship. All employees of the affiliated service group are generally treated as employed by a single employer for purposes of any qualified retirement plan testing. Affiliated service group determinations can be complicated, and you should consult with your own legal counsel to determine if your company is part of an affiliated service group. Internal Revenue Code §414(m) defines affiliated service groups.

Auditor: For purposes of the Form 5500/5500-SF filings, your plan's auditor must be an independent qualified public accountant. This is because federal law requires that the auditor engaged for an employee benefit plan audit be licensed or certified as a public accountant by a state regulatory authority. Auditors of employee benefit plans should not have any financial interests in the plan or the plan sponsor that would affect their ability to render an objective, unbiased opinion about the financial condition of the plan. The DOL has published guidance on its website on how to select an auditor at https://www.dol.gov/sites/default/files/ebsa/about-ebsa/our-activities/resource-center/publications/selecting-an-auditor-for-your-employee-benefit-plan.pdf.

Business code: The six-digit business code is included in a Form 5500/5500-SF filing. You should use the one that most closely describes the business or trade of the plan sponsor. Your business code is included in your plan's Form 5500/5500-SF filing. Merrill will compile your Form 5500/5500-SF based on the business code you provided during the prior year. It is important that you use a valid business code because EFAST2 is expected to reject Form 5500 filings with invalid business codes. You should select the appropriate business code from the Form 5500/5500-SF filing instructions "Codes for Principal Business Activity" that apply for the year being filed. The software (Web Client) that Merrill uses to compile the Form 5500 has an edit check that confirms that the business code that you use is valid. As a result, if you file through Web Client you should not be at risk of having your filings rejected for an invalid business code.

Cash-based versus accrual-based accounting: Cash-based accounting requires that assets be valued at the beginning and end of the plan year, irrespective of plan amounts payable or receivable as of those dates. Accrual-based accounting requires that any receivables and payables as of the plan year beginning and end be included.

Collectively bargained plan: A plan in this category covers employees subject to the collective-bargaining process. For qualified plan coverage testing purposes, this generally requires that retirement benefits were the subject of good faith bargaining.

Common/collective trust (CCT): For Form 5500 reporting purposes, a "common/collective trust" (CCT) is a trust maintained by a bank, trust company, or similar institution, which is regulated, supervised, and subject to periodic examination by a state or federal agency for the collective investment and reinvestment of assets contributed thereto from employee benefit plans maintained by more than one employer or controlled group of corporations.

Each collective trust must provide annual financial statements of the CCT funds in accordance with Reg. §2520.103-5(c)(2)(i)(A). These financial statements should be made available to your auditors by the fund provider. A collective trust fund is generally valued at the net asset value (NAV) of units of a collective trust. The NAV, as provided by the trustee, is used as a practical expedient to estimate fair value. The NAV is based on the fair value of the underlying investments held by the fund less its liabilities. Plan sponsors/administrators may not be able to use this practical expedient if they determine that it is probable that the fund will sell the investment for an amount different than the reported NAV.

Controlled group: Generally, when two or more companies are legally considered a controlled group, all employees of the group are treated as employed by a single employer for qualified retirement plan purposes. A controlled group can include:

- A parent-subsidiary controlled group: A group of companies connected through at least 80% stock ownership.
- A brother-sister controlled group: Five or fewer people jointly own 80% or more of each of the companies, and the same five or fewer individuals' combined identical ownership in each of these companies also exceeds 50%.

Controlled group determinations can be complicated, and you should consult with your own legal counsel to determine if your company is part of a controlled group. The requirements for controlled group determination are found in IRC §414. In addition, IRC §1563 defines parent-subsidiary and brother-sister controlled groups. When determining ownership, the stock attribution rules of IRC §318 apply.

Current value: Current value means fair market value where available. Otherwise, it means the fair value as determined in good faith under the terms of the plan by a trustee or a named fiduciary, assuming an orderly liquidation at time of the determination.

Deferred vested benefit: For Form 8955-SSA reporting purposes, a deferred vested benefit refers to someone who separated from service (generally in the prior year or earlier) with a vested account valued at more than $0 who was not paid out and is not receiving ongoing distributions from the plan (for example, installment or annuity payments).

Direct Filing Entity (DFE): Types of Direct Filing Entities include:

- Master trust investment accounts (MTIA)
- Group Insurance Arrangements

- Common/Collective Trusts (CCT) and Pooled Separate Accounts (PSA)
- 103-12 Investment Entities

EFAST2: EFAST2 is the acronym for the ERISA Filing Acceptance System II. EFAST2 is an all-electronic system designed by the Department of Labor, Internal Revenue Service, and Pension Benefit Guaranty Corporation to simplify and expedite the submission, receipt, and processing of the Form 5500 and Form 5500-SF. These forms must be electronically filed each year by employee benefit plans to satisfy annual reporting requirements under the Employee Retirement Income Security Act (ERISA) and the Internal Revenue Code. Under EFAST2, filers choose between using EFAST2-approved vendor software or the DOL's website (IFILE) to prepare and submit the Form 5500 or Form 5500-SF. Completed forms are submitted via the Internet to EFAST2 for processing.

Employer identification number (EIN): The nine-digit EIN is assigned to the plan sponsor/employer/entity that identifies the employer or the payor. It is critical that the EIN used to identify the plan sponsor be the same from year to year when completing Line 2b of the Form 5500 or Form 5500-SF. Changing EINs, without reporting the change on line 4 of the Form 5500 or Form 5500-SF, could result in correspondence from the DOL or the IRS. For purposes of the Schedule R, the EIN that is used is the EIN of the payor.

Fidelity bond: With few exceptions, a fidelity bond is required for every fiduciary of an employee benefit plan and every person who handles funds or other property of such a plan. The fidelity bond is generally 10% of the value of plan assets, with a minimum required bond of $1,000 and a maximum required bond of (generally) $500,000. If your plan holds employer securities, the maximum required bond amount will increase to $1,000,000. Plan asset values are determined as of the beginning of the plan year. If a plan is a small plan with nonqualified plan assets, the fidelity bond amount may need to be higher than the amount listed to be exempt from the plan audit requirements.

Bonds must be placed with a surety or reinsurer that is named on the Department of the Treasury's Listing of Approved Sureties, Department Circular 570 (available at https://www.fiscal.treasury.gov/fsreports/ref/suretyBnd/c570.htm). In addition, neither the plan nor a party-in-interest with respect to the plan may have any control or significant financial interest, whether direct or indirect, in the surety, or reinsurer, or in an agent or broker through whom the bond is obtained. Moreover, according to the DOL, in response to a request from any participant or beneficiary, the plan administrator must furnish without charge evidence of any required fidelity bond for the small plan audit waiver to apply. (See DOL FAQs at https://www.dol.gov/sites/default/files/ebsa/about-ebsa/our-activities/resource-center/faqs/small-pension-plan-audit-waiver-regulation.pdf.)

FIRE system: The IRS electronic filing system called Filing Information Returns Electronically (FIRE) is used to file the Form 8955-SSA electronically. Plan sponsors/administrators have access to electronically file their Form 8955-SSA to the IRS through Web Client, which uses the IRS FIRE system when the Form 8955-SSA is submitted.

Form 5500 series planbook: We use the term "Form 5500 series planbook" to mean the Form 5500, 5500-SF, 5500-EZ, Form 8955-SSA, Form 5558, and schedules and attachments related to these forms that are included in Web Client.

Independent qualified public accountant's opinion: Plans that are required to file a Schedule H to present the plan's financial information (generally, those with 100 or more participants with account balances) are also required to have an audit of the plan's financial statements by an independent qualified public accountant (IQPA). A special rule allows plans with between 80-120 participants with account balances at the beginning of the plan year to file as a large or small plan consistent with how they filed their preceding plan year's Form 5500/5500-SF filing. In the event that they satisfy this special rule, they may then qualify to avoid the requirement of conducting an independent audit of their plan if they meet the conditions for an audit waiver under 29 CFR 2520.104-46. In addition, small plans that do not satisfy the conditions for a small plan audit waiver may also be required to obtain an audit.

There are three basic requirements for a small plan to be eligible for the audit waiver:

- As of the last day of the preceding plan year, at least 95% of a small pension plan's assets must be "qualifying plan assets" or, if less than 95% are qualifying plan assets, then any person who handles assets of a plan that do not constitute "qualifying plan assets" must be bonded in an amount that is at least equal to the value of the "non-qualifying plan assets" he or she handles.
- The plan must include certain information in the Summary Annual Report (SAR) furnished to participants and beneficiaries in addition to the information ordinarily required.
- In response to a request from any participant or beneficiary, the plan administrator must furnish without charge copies of statements the plan receives from the regulated financial institutions holding or issuing the plan's "qualifying plan assets" and evidence of any required fidelity bond.

The plan sponsor's independent accountant (or accounting firm) must identify the type of opinion they are offering about the plan's financial statements. The four types of opinions are:

- **Unmodified**: Generally, an unmodified opinion is issued when the independent qualified public accountant concludes that the plan's financial statements present fairly, in all material respects, the financial status of the plan as of the end of the period audited and that the changes in its financial status for the period under audit are in conformity with generally accepted accounting principles.
- **Qualified**: Generally, a qualified opinion is issued by an independent qualified public accountant when the plan's financial statements present fairly, in all material respects, the financial status of the plan as of the end of the period audited and the changes in its financial status for the period under audit are in conformity with generally accepted accounting principles, except for the effects of one or more matters described in the opinion.
- **Disclaimer**: A disclaimer of opinion is issued when the independent qualified public accountant does not express an opinion on the financial statements because an audit sufficient in scope to form an opinion on the financial statements was not performed.
- **Adverse**: Generally, an adverse opinion is issued by an independent qualified public accountant when the plan's financial statements do not present fairly, in all material respects, the financial status of the plan as of the end of the audit period.

Large plan: A large plan is a plan that generally covers 100 or more participants with account balances as of the beginning of the plan year. However special rules apply to a plan that has between 80 and 120 employees with account balances as of the beginning of the plan year. Under the 80-120 rule, if the number of participants with account balances as of the beginning of the plan year is between 80 and 120, and a Form 5500 annual return/report was filed for the prior plan year, you may elect to complete the return/report in the same category ("large plan" or "small plan") as was filed for the prior return/report.

Leased employees: A leased employee is any person who is not an employee but has provided services to the plan sponsor under the sponsor's primary direction or control pursuant to an agreement between the plan sponsor and a leasing organization for a period of at least one year on a substantially full-time basis. More information about leased employees can be found in IRC §414(n).

Master trust: For Form 5500/5500-SF reporting purposes, a "master trust" is a trust for which a regulated financial institution serves as trustee or custodian (regardless of whether such institution exercises discretionary authority or control with respect to the management of assets held in the trust), and in which assets of more than one plan sponsored by a single employer or by a group of employers under common control are held.

Master trust investment account (MTIA): For Form 5500/5500-SF reporting purposes, a master trust investment account (MTIA) is an investment account within a master trust. A MTIA may consist of a pool of assets or a single asset. Each pool of assets held in a master trust must be treated as a separate MTIA if each plan that has an interest in the pool has the same fractional interest in each asset in the pool as its fractional interest in the pool, and if each such plan may not dispose of its interest in any asset in the pool without disposing of its interest in the pool. A master trust may also contain assets that are not held in such a pool. Each such asset must be treated as a separate MTIA.

Money purchase plan: A money purchase plan is a qualified defined contribution retirement plan that is considered a pension (as opposed to a profit-sharing) plan. A money purchase plan must provide a fixed contribution formula that is not subject to the employer's discretion unless the plan is amended and is not geared to the company's profits.

Multi-employer plan: Multi-employer plans are sponsored by a labor union where members of the union are covered by the plan and may work for companies that are not within a controlled group. Participation in the plan is based on labor union membership—not employment. A plan is a multi-employer plan if it meets all of the following conditions:

- More than one unrelated employer is required to contribute.
- The plan is maintained pursuant to one or more collective bargaining agreements between one or more employee organizations and more than one employer.
- An election under IRC section 414(f)(5) and ERISA section 3(37)(e) has not been made.

Multiple-employer plan (MEP): Multiple-employer plans are plans where unrelated employers adopt the same plan. The Schedule MEP should be completed for multiple-employer plans.

Nonexempt transactions: Nonexempt transactions are transactions with a party in interest that include any directly or indirectly:

- The sale, exchange or leasing of any property between the plan and a party in interest.
- Lending money or extension of credit between a plan and a party in interest.
- Furnishing goods and services between the plan and a party in interest.
- Transfer to, or use by, a party in interest of the income or assets of the plan.
- The act of a plan fiduciary whereby he deals with plan assets or income for his own interest or own account.
- A plan fiduciary engaging in any transaction involving the plan on behalf of a party whose interests are adverse to the interests of the plan.
- A plan fiduciary's receipt of any consideration for his own personal account from any party dealing with such plan in connection with a transaction involving the assets of the plan.

All nonexempt party-in-interest transactions must be reported, regardless of whether disclosed in the accountant's report, unless the nonexempt transaction is:

- Statutorily exempt under Part 4 of Title I of ERISA;
- Administratively exempt under ERISA section 408(a);
- Exempt under Code sections 4975(c) or 4975(d);
- The holding of participant contributions in the employer's general assets for a welfare plan that meets the conditions of ERISA Technical Release 92-01;
- A transaction of a 103-12 IE with parties other than the plan; or
- A delinquent participant contribution or a delinquent participant loan repayment reported on Schedule H, line 4a.

One-participant plan: A one-participant plan is a pension benefit plan that either:

- Covers only an individual or an individual and his or her spouse who wholly own a trade or business, whether incorporated or unincorporated; or
- Covers only the partners and/or the partners' spouses of a partnership.

One-participant profit sharing or money purchase plans may file the Form 5500-SF electronically.

Partial plan termination: A partial plan termination describes a situation in which the number of employer-initiated severances results in affected participants being treated as if they were participants in a plan that terminated. This is a facts and circumstances determination that plan sponsors should address with their legal counsel. However, according to IRS guidance, if more than 20% of total plan participants have an employer-initiated severance in a particular year, then the plan may have a partial termination. All "affected participants" must be fully vested in their account balance as of the date of a full or partial plan termination. This means that affected plan participants must become 100% vested in all employer contributions (including matching contributions) regardless of the plan's vesting schedule.

An affected participant in a partial termination is generally anyone who left employment for any reason during the plan year in which the partial termination occurred and who still has an account balance under the plan. Some plans wait until a participant has five consecutive one-year breaks in service before the participant forfeits their nonvested account balance. For these plans, participants who left during the plan year of the partial termination and who have not had five consecutive one-year breaks in service are affected participants (see IRC §411(d)(3) and Revenue Ruling 2007-43).

Participant: ERISA section 3(7) defines participant as any employee, former employee of an employer, or any member or former member of an employee organization who is covered by the plan. Also, a participant is an employee or former employee who is or may become eligible to receive a benefit of any type from an employee benefit plan. The plan, for these purposes, is one that covers any of the following:

- Employees of such employer.
- Members of such organization.
- Those whose beneficiaries may be eligible to receive any such benefit.

For Form 5500/5500-SF filing requirements, participants are divided into one of the following categories:

- Active participants: Active participants include individuals who are currently employed and have satisfied eligibility requirements to participate in the plan. They are also earning or retaining credited service under a plan. This category includes any employees who are eligible to have the employer make payments to an IRC §401(k) qualified cash or deferred arrangement. Active participants also include any nonvested employees who are earning or retaining credited service under a plan. This category does not include:
  a) Nonvested former employees who have incurred a break in the service period specified in the plan, or
  b) Former employees who have received a cash-out distribution or deemed distribution of their entire nonforfeitable accrued benefit.
- Retired or separated participants receiving benefits: Retired or separated participants receiving benefits are individuals who are retired or have terminated their employment with the plan sponsor and are receiving benefits under the plan. This category does not include any individual to whom an insurance company has made an irrevocable commitment to pay all the benefits the individual is entitled to under the plan.
- Other retired or separated participants entitled to future benefits: Other retired or separated participants entitled to future benefits are individuals who meet these criteria:
  - Retired or otherwise terminated from employment with the plan sponsor, and
  - Entitled to begin receiving benefits from the plan in the future.
  - This category does not include individuals to whom an insurance company has irrevocably committed to paying all benefits for under the plan.
- Deceased participants: Deceased participants include deceased employees who have one or more beneficiaries who are receiving or are entitled to receive future benefits under the plan. This category does not include individuals to whom an insurance company has irrevocably committed to paying all benefits for under the plan

Participant-directed account plan: A plan that provides participants the opportunity to direct the investment of some or all of the assets allocated to their individual accounts, regardless of whether 29 CFR 2550.404c-1 is intended to be met.

Party in interest: A party in interest includes:

- A fiduciary of the plan
- An employee of the plan
- A person providing services to the plan
- An employer whose employees are participants of the plan
- An employee organization whose members are covered by the plan
- An owner with a more than 50% interest
- A relative of any of the above-described persons
- A related corporation owned or controlled by the above
- An employee, officer, or director or 10% owner of the entities described above

Plan administrator: The plan administrator is generally the person(s) or entity responsible for administering the plan and is normally so designated in the plan document. If no plan administrator is named in the plan document, the plan sponsor is the plan administrator.

Plan benefit arrangement: The plan benefit arrangement is the method by which benefits are actually provided to participants and beneficiaries. The choices for such an arrangement identified on the Form 5500/5500-SF include the following:

- Insurance
- Section 412(i) insurance contracts
- Trust
- General assets of plan sponsor

Planbook: A term Merrill uses to describe the collection of forms and related schedules and attachments that may be accessed electronically by clients. This includes the Form 5500 and related schedules or the Form 5500-SF, and the Form 8955-SSA. The Merrill Regulatory Reporting and Operations (RR&O) Department that compiled the Form 5500, 5500-SF and Form 8955-SSA is the publisher of the planbook. You will receive emails from the individual compliance specialist who published your planbook.

Plan characteristic codes: Form 5500/5500-SF reflects the plan characteristic codes that apply to your plan. These codes provide information on the types of contributions that are allowed under your plan, employees eligible to participate in your plan and other plan information. For your reference, a list of the available plan characteristic codes are included in Exhibit 1.

Plan funding arrangement: The plan funding arrangement is the method for receiving, holding, investing and transmitting plan assets prior to the time benefits are provided. The choices for such an arrangement identified on the Form 5500/5500-SF include the following:

- Insurance
- Section 412(i) insurance contracts
- Trust
- General assets of plan sponsor

The instructions to the Form 5500/5500-SF provide that general assets of the plan sponsor means either that the plan had no assets or some assets were commingled with the general assets of the plan sponsor prior to the time that the plan provided the benefits that were promised.

Plan sponsor: Plan sponsor means the employer, for an employee benefit plan that a single employer established or maintains; the employee organization in the case of a plan of an employee organization; or the association, committee, joint board of trustees, or other similar group of representatives of the parties who establish or maintain the plan, if the plan is established or maintained jointly by one or more employers and one or more employee organizations, or by two or more employers.

Plan termination: Plan sponsors can choose to terminate their qualified retirement plans under appropriate circumstances. When a qualified retirement plan is terminated, there are a number of legal requirements, including full vesting and the distribution of assets to participants and beneficiaries as soon as administratively feasible. A Form 5500/5500-SF must be filed, irrespective of plan termination, as long as the plan held assets during the plan year. For the plan year in which all remaining assets are distributed, a final Form 5500/5500-SF must be filed no later than the close of the seventh month after the date all plan assets are distributed. Participants who were previously reported on the Form 8955-SSA or Schedule SSA as having a deferred vested benefit will generally need to be reported with a Code D on the Form 8955-SSA after they receive their distribution on account of plan termination.

Pooled employer plan (PEP): A type of multiple-employer plan treated as a single plan and not adopted by employers that have related interest other than the plan.

Pooled separate account (PSA): For Form 5500/5500-SF reporting purposes, a pooled separate account is an account maintained by an insurance carrier, which is regulated, supervised, and subject to periodic examination by a state agency for the collective investment and reinvestment of assets contributed thereto from employee benefit plans maintained by more than one employer or controlled group of corporations. For Form 5500/5500-SF reporting purposes, a separate account that is not considered to be holding plan assets pursuant to 29 CFR 2510.3-101(h)(1)(iii) does not constitute a PSA.

Preparer tax identification number (PTIN): A PTIN is a number the IRS assigns to individuals who prepare or assist in preparing federal tax returns for compensation. The PTIN is not required for compiling the Form 5500/5500-SF filings or the Form 8955-SSA as those filings are information returns and not tax returns.

Qualifying plan assets: For purposes of line 4k to Schedule I of the Form 5500/5500-SF, the term qualifying plan assets, generally, means:

1. Any assets held by any of the following regulated financial institutions:
    a) A bank or similar financial institution as defined in 29 CFR 2550.408b-4(c);
    b) An insurance company qualified to do business under the laws of a state;
    c) An organization registered as a broker-dealer under the Securities Exchange Act of 1934; or
    d) Any other organization authorized to act as a trustee for individual retirement accounts under Code section 408.
2. Shares issued by an investment company registered under the Investment Company Act of 1940 (for example, mutual funds);
3. Investment and annuity contracts issued by any insurance company qualified to do business under the laws of a state;
4. In the case of an individual account plan, any assets in the individual account of a participant or beneficiary over which the participant or beneficiary has the opportunity to exercise control and with respect to which the participant or beneficiary is furnished, at least annually, a statement from a regulated financial institution referred to above describing the assets held or issued by the institution and the amount of such assets;
5. Qualifying employer securities, as defined in ERISA section 407(d)(5); and
6. Participant loans meeting the requirements of ERISA section 408(b)(1).

Receivables/payables:

- Employer contribution receivables: Employer contributions due to the plan from the employer as of the end of the plan year, but not yet paid.
- Participant contribution receivables: Contributions withheld by the employer from participants (generally section 401(k) elective contributions) and amounts due directly from participants that have not yet been received by the plan.
- Payables: Liabilities that have not yet been paid by the plan as of the end of the plan year.

Service provider: Any persons—including individuals, trades and businesses (whether incorporated or unincorporated)—who have performed a service and received direct or indirect compensation from the plan.

Single-employer plan: A single-employer plan is sponsored by a single corporation, partnership, or sole proprietorship and covers only employees of that single employer. A plan covering employees in a controlled group is still a single-employer plan for which a single annual Form 5500/5500-SF filing should be made.

Small plan: A plan that generally covers fewer than 100 participants with account balances as of the beginning of the plan year.

Trust identification number: This is the identification number assigned to the trust holding assets of the plan. It is not the corporate trustee's EIN or the plan administrator's EIN, even if the plan administrator is also the trustee. The trust identification number should be used to identify trust assets as separate from employer assets when, for example, distributions are reported on Form 1099-R.

Web Client: Web Client is an EFAST2-approved, Internet-based application that Merrill uses to provide access to the Form 5500/5500-SF for our clients for which we compile these forms. Web Client may be accessed via Internet by our clients so that they may review, edit, sign and transmit (file) Form 5500/5500-SF electronically with the DOL. In addition, Web Client is also used to view, edit and transmit (file) the Form 8955-SSA electronically with the IRS.

Useful links

The Internal Revenue Service and Department of Labor provide useful links for obtaining additional information:

- Department of Labor website:
  www.dol.gov
- EFAST2 website:
  www.efast.dol.gov
- Form 5500/5500-SF main page (DOL):
  https://www.dol.gov/agencies/ebsa/employers-and-advisers/plan-administration-and-compliance/reporting-and-filing/form-5500
- Form 5500 Schedule C FAQs (DOL):
  https://www.dol.gov/sites/default/files/ebsa/about-ebsa/our-activities/resource-center/faqs/2009-form-5500-schedule-c.pdf
  and
  https://www.dol.gov/sites/default/files/ebsa/about-ebsa/our-activities/resource-center/faqs/supplemental-2009-schedule-c.pdf
- Internal Revenue Service website:
  www.irs.gov

Exhibit 1: Business codes and plan characteristics

Forms 5500, 5500-SF, and 5500-EZ Codes for Principal Business Activity

This list of principal business activities and their associated codes is designed to classify an enterprise by the type of activity in which it is engaged.

These principal activity codes are based on the North American Industry Classification System.

Code	
Agriculture, Forestry, Fishing and Hunting	
Crop Production	
111100	Oilseed & Grain Farming
111210	Vegetable & Melon Farming (including potatoes & yams)
111300	Fruit & Tree Nut Farming
111400	Greenhouse, Nursery, & Floriculture Production
111900	Other Crop Farming (including tobacco, cotton, sugarcane, hay, peanut, sugar beet, & all other crop farming)
Animal Production	
112111	Beef Cattle Ranching & Farming
112112	Cattle Feedlots
112120	Dairy Cattle & Milk Production
112210	Hog & Pig Farming
112300	Poultry & Egg Production
112400	Sheep & Goat Farming
112510	Aquaculture (including shellfish & finfish farms & hatcheries)
112900	Other Animal Production
Forestry and Logging	
113110	Timber Tract Operations
113210	Forest Nurseries & Gathering of Forest Products
113310	Logging
Fishing, Hunting and Trapping	
114110	Fishing
114210	Hunting & Trapping
Support Activities for Agriculture and Forestry	
115110	Support Activities for Crop Production (including cotton ginning, soil preparation, planting, & cultivating)
115210	Support Activities for Animal Production
115310	Support Activities for Forestry
Mining	
211120	Crude Petroleum Extraction
211130	Natural Gas Extraction
212110	Coal Mining
212200	Metal Ore Mining
212310	Stone Mining & Quarrying
212320	Sand, Gravel, Clay, & Ceramic & Refractory Minerals Mining, & Quarrying
212390	Other Nonmetallic Mineral Mining & Quarrying
213110	Support Activities for Mining
Utilities	
221100	Electric Power Generation, Transmission & Distribution
221210	Natural Gas Distribution
221300	Water, Sewage & Other Systems
221500	Combination Gas & Electric
Construction	
Construction of Buildings	
236110	Residential Building Construction
236200	Nonresidential Building Construction
Heavy and Civil Engineering Construction	
237100	Utility System Construction
237210	Land Subdivision
237310	Highway, Street, & Bridge
237990	Other Heavy & Civil Engineering Construction

Code	
Specialty Trade Contractors	
238100	Foundation, Structure, & Building Exterior Contractors (including framing carpentry, masonry, glass, roofing, & siding)
238210	Electrical Contractors
238220	Plumbing, Heating, & Air-Conditioning Contractors
238290	Other Building Equipment Contractors
238300	Building Finishing Contractors (including drywall, insulation, painting, wallcovering, flooring, tile, & finish carpentry)
238900	Other Specialty Trade Contractors (including site preparation)
Manufacturing	
Food Manufacturing	
311110	Animal Food Mfg
311200	Grain & Oilseed Milling
311300	Sugar & Confectionary Product Mfg
311400	Fruit & Vegetable Preserving & Specialty Food Mfg
311500	Dairy Product Mfg
311610	Animal Slaughtering and Processing
311710	Seafood Product Preparation & Packaging
311800	Bakeries, Tortilla & Dry Pasta Mfg
311900	Other Food Mfg (including coffee, tea, flavorings & seasonings)
Beverage and Tobacco Product Manufacturing	
312110	Soft Drink & Ice Mfg
312120	Breweries
312130	Wineries
312140	Distilleries
312200	Tobacco Manufacturing
Textile Mills and Textile Product Mills	
313000	Textile Mills
314000	Textile Product Mills
Apparel Manufacturing	
315100	Apparel Knitting Mills
315210	Cut & Sew Apparel Contractors
315220	Men's & Boys' Cut & Sew Apparel Mfg.
315240	Women's, Girls' and Infants' Cut & Sew Apparel Mfg.
315280	Other Cut & Sew Apparel Mfg
315990	Apparel Accessories & Other Apparel Mfg
Leather and Allied Product Manufacturing	
316110	Leather & Hide Tanning, & Finishing
316210	Footwear Mfg (including rubber & plastics)
316990	Other Leather & Allied Product Mfg
Wood Product Manufacturing	
321110	Sawmills & Wood Preservation
321210	Veneer, Plywood, & Engineered Wood Product Mfg
321900	Other Wood Product Mfg
Paper Manufacturing	
322100	Pulp, Paper, & Paperboard Mills
322200	Converted Paper Product Mfg

Code	
Printing and Related Support Activities	
323100	Printing & Related Support Activities
Petroleum and Coal Products Manufacturing	
324110	Petroleum Refineries (including integrated)
324120	Asphalt Paving, Roofing, & Saturated Materials Mfg
324190	Other Petroleum & Coal Products Mfg
Chemical Manufacturing	
325100	Basic Chemical Mfg
325200	Resin, Synthetic Rubber, & Artificial & Synthetic Fibers & Filaments Mfg
325300	Pesticide, Fertilizer, & Other Agricultural Chemical Mfg
325410	Pharmaceutical & Medicine Mfg
325500	Paint, Coating, & Adhesive Mfg
325600	Soap, Cleaning Compound, & Toilet Preparation Mfg
325900	Other Chemical Product & Preparation Mfg
Plastics and Rubber Products Manufacturing	
326100	Plastics Product Mfg
326200	Rubber Product Mfg
Nonmetallic Mineral Product Manufacturing	
327100	Clay Product & Refractory Mfg
327210	Glass & Glass Product Mfg
327300	Cement & Concrete Product Mfg
327400	Lime & Gypsum Product Mfg
327900	Other Nonmetallic Mineral Product Mfg
Primary Metal Manufacturing	
331110	Iron & Steel Mills & Ferroalloy Mfg
331200	Steel Product Mfg from Purchased Steel
331310	Alumina & Aluminum Production & Processing
331400	Nonferrous Metal (except Aluminum) Production & Processing
331500	Foundries
Fabricated Metal Product Manufacturing	
332110	Forging & Stamping
332210	Cutlery & Handtool Mfg
332300	Architectural & Structural Metals Mfg
332400	Boiler, Tank, & Shipping Container Mfg
332510	Hardware Mfg
332610	Spring & Wire Product Mfg
332700	Machine Shops; Turned Product; & Screw, Nut, & Bolt Mfg
332810	Coating, Engraving, Heat Treating, & Allied Activities
332900	Other Fabricated Metal Product Mfg
Machinery Manufacturing	
333100	Agriculture, Construction, & Mining Machinery Mfg
333200	Industrial Machinery Mfg
333310	Commercial & Service Industry Machinery Mfg
333410	Ventilation, Heating, Air-Conditioning, & Commercial Refrigeration Equipment Mfg
333510	Metalworking Machinery Mfg
333610	Engine, Turbine & Power Transmission Equipment Mfg
333900	Other General Purpose Machinery Mfg

Code	
Computer and Electronic Product Manufacturing	
334110	Computer & Peripheral Equipment Mfg
334200	Communications Equipment Mfg
334310	Audio & Video Equipment Mfg
334410	Semiconductor & Other Electronic Component Mfg
334500	Navigational, Measuring, Electromedical, & Control Instruments Mfg
334610	Manufacturing & Reproducing Magnetic & Optical Media
Electrical Equipment, Appliance, and Component Manufacturing	
335100	Electric Lighting Equipment Mfg
335200	Major Household Appliance Mfg
335310	Electrical Equipment Mfg
335900	Other Electrical Equipment & Component Mfg
Transportation Equipment Manufacturing	
336100	Motor Vehicle Mfg
336210	Motor Vehicle Body & Trailer Mfg
336300	Motor Vehicle Parts Mfg
336410	Aerospace Product & Parts Mfg
336510	Railroad Rolling Stock Mfg
336610	Ship & Boat Building
336990	Other Transportation Equipment Mfg
Furniture and Related Product Manufacturing	
337000	Furniture & Related Product Manufacturing
Miscellaneous Manufacturing	
339110	Medical Equipment & Supplies Mfg
339900	Other Miscellaneous Mfg
Wholesale Trade	
Merchant Wholesalers, Durable Goods	
423100	Motor Vehicle, & Motor Vehicle Parts & Supplies
423200	Furniture & Home Furnishings
423300	Lumber & Other Construction Materials
423400	Professional & Commercial Equipment & Supplies
423500	Metal & Mineral (except petroleum)
423600	Household Appliances and Electrical & Electronic Goods
423700	Hardware, Plumbing, & Heating Equipment & Supplies
423800	Machinery, Equipment, & Supplies
423910	Sporting & Recreational Goods & Supplies
423920	Toy, & Hobby Goods, & Supplies
423930	Recyclable Materials
423940	Jewelry, Watch, Precious Stone, & Precious Metals
423990	Other Miscellaneous Durable Goods
Merchant Wholesalers, Nondurable Goods	
424100	Paper & Paper Products
424210	Drugs & Druggists' Sundries
424300	Apparel, Piece Goods, & Notions
424400	Grocery & Related Products
424500	Farm Product Raw Materials
424600	Chemical & Allied Products

Forms 5500, 5500-SF, and 5500-EZ Codes for Principal Business Activity (*continued*)

Code	
424700	Petroleum & Petroleum Products
424800	Beer, Wine, & Distilled Alcoholic Beverages
424910	Farm Supplies
424920	Book, Periodical, & Newspapers
424930	Flower, Nursery Stock, & Florists' Supplies
424940	Tobacco & Tobacco Products
424950	Paint, Varnish, & Supplies
424990	Other Miscellaneous Nondurable Goods
Wholesale Electronic Markets and Agents and Brokers	
425110	Business to Business Electronic Markets
425120	Wholesale Trade Agents & Brokers

Retail Trade

Motor Vehicle and Parts Dealers	
441110	New Car Dealers
441120	Used Car Dealers
441210	Recreational Vehicle Dealers
441222	Boat Dealers
441228	Motorcycle, ATV, and All Other Motor Vehicle Dealers
441300	Automotive Parts, Accessories, & Tire Stores
Furniture and Home Furnishings Stores	
442110	Furniture Stores
442210	Floor Covering Stores
442291	Window Treatment Stores
442299	All Other Home Furnishings Stores
Electronics and Appliance Stores	
443141	Household Appliance Stores
443142	Electronics Stores (including Audio, Video, Computer, and Camera Stores)
Building Material and Garden Equipment and Supplies Dealers	
444110	Home Centers
444120	Paint & Wallpaper Stores
444130	Hardware Stores
444190	Other Building Material Dealers
444200	Lawn & Garden Equipment & Supplies Stores
Food and Beverage Stores	
445110	Supermarkets and Other Grocery (except Convenience) Stores
445120	Convenience Stores
445210	Meat Markets
445220	Fish & Seafood Markets
445230	Fruit & Vegetable Markets
445291	Baked Goods Stores
445292	Confectionery & Nut Stores
445299	All Other Specialty Food Stores
445310	Beer, Wine, & Liquor Stores
Health and Personal Care Stores	
446110	Pharmacies & Drug Stores
446120	Cosmetics, Beauty Supplies, & Perfume Stores
446130	Optical Goods Stores
446190	Other Health & Personal Care Stores
Gasoline Stations	
447100	Gasoline Stations (including convenience stores with gas)
Clothing and Clothing Accessories Stores	
448110	Men's Clothing Stores
448120	Women's Clothing Stores
448130	Children's & Infants' Clothing Stores
448140	Family Clothing Stores
448150	Clothing Accessories Stores
448190	Other Clothing Stores
448210	Shoe Stores
448310	Jewelry Stores
448320	Luggage & Leather Goods Stores
Sporting Goods, Hobby, Book, and Music Stores	
451110	Sporting Goods Stores
451120	Hobby, Toy, & Game Stores
451130	Sewing, Needlework, & Piece Goods Stores
451140	Musical Instrument & Supplies Stores
451211	Book Stores
451212	News Dealers & Newsstands
General Merchandise Stores	
452200	Department Stores
452300	General Merchandise Stores, incl. Warehouse Clubs & Supercenters
Miscellaneous Store Retailers	
453110	Florists
453210	Office Supplies & Stationery Stores
453220	Gift, Novelty, & Souvenir Stores
453310	Used Merchandise Stores
453910	Pet & Pet Supplies Stores
453920	Art Dealers
453930	Manufactured (Mobile) Home Dealers
453990	All Other Miscellaneous Store Retailers (including tobacco, candle, & trophy shops)
Nonstore Retailers	
454110	Electronic Shopping & Mail-Order Houses
454210	Vending Machine Operators
454310	Fuel Dealers (including Heating Oil and Liquefied Petroleum)
454390	Other Direct Selling Establishments (including door-to-door retailing, frozen food plan providers, party plan merchandisers, & coffee-break service providers)

Transportation and Warehousing

Air, Rail, and Water Transportation	
481000	Air Transportation
482110	Rail Transportation
483000	Water Transportation
Truck Transportation	
484110	General Freight Trucking, Local
484120	General Freight Trucking, Long-distance
484200	Specialized Freight Trucking
Transit and Ground Passenger Transportation	
485110	Urban Transit Systems
485210	Interurban & Rural Bus Transportation
485310	Taxi Service
485320	Limousine Service
485410	School & Employee Bus Transportation
485510	Charter Bus Industry
485990	Other Transit & Ground Passenger Transportation
Pipeline Transportation	
486000	Pipeline Transportation
Scenic & Sightseeing Transportation	
487000	Scenic & Sightseeing Transportation
Support Activities for Transportation	
488100	Support Activities for Air Transportation
488210	Support Activities for Rail Transportation
488300	Support Activities for Water Transportation
488410	Motor Vehicle Towing
488490	Other Support Activities for Road Transportation
488510	Freight Transportation Arrangement
488990	Other Support Activities for Transportation
Couriers and Messengers	
492110	Couriers
492210	Local Messengers & Local Delivery
Warehousing and Storage	
493100	Warehousing & Storage (except lessors of miniwarehouses & self-storage units)

Information

Publishing Industries (except Internet)	
511110	Newspaper Publishers
511120	Periodical Publishers
511130	Book Publishers
511140	Directory & Mailing List Publishers
511190	Other Publishers
511210	Software Publishers
Motion Picture and Sound Recording Industries	
512100	Motion Picture & Video Industries (except video rental)
512200	Sound Recording Industries
Broadcasting (except Internet)	
515100	Radio & Television Broadcasting
515210	Cable & Other Subscription Programming
Telecommunications	
517000	Telecommunications (including paging, cellular, satellite, cable & other program distribution, resellers, other telecommunications, & internet service providers)
Data Processing Services	
518210	Data Processing, Hosting, & Related Services
Other Information Services	
519100	Other Information Services (including news syndicates, libraries, internet publishing & broadcasting)

Finance and Insurance

Depository Credit Intermediation	
522110	Commercial Banking
522120	Savings Institutions
522130	Credit Unions
522190	Other Depository Credit Intermediation
Nondepository Credit Intermediation	
522210	Credit Card Issuing
522220	Sales Financing
522291	Consumer Lending
522292	Real Estate Credit (including mortgage bankers & originators)
522293	International Trade Financing
522294	Secondary Market Financing
522298	All Other Nondepository Credit Intermediation
Activities Related to Credit Intermediation	
522300	Activities Related to Credit Intermediation (including loan brokers, check clearing, & money transmitting)
Securities, Commodity Contracts, and Other Financial Investments and Related Activities	
523110	Investment Banking & Securities Dealing
523120	Securities Brokerage
523130	Commodity Contracts Dealing
523140	Commodity Contracts Brokerage
523210	Securities & Commodity Exchanges
523900	Other Financial Investment Activities (including portfolio management & investment advice)
Insurance Carriers and Related Activities	
524130	Reinsurance Carriers
524140	Direct Life, Health, & Medical Insurance Carriers
524150	Direct Insurance (except Life, Health & Medical) Carriers
524210	Insurance Agencies & Brokerages
524290	Other Insurance Related Activities (including third-party administration of Insurance and pension funds)
Funds, Trusts, and Other Financial Vehicles	
525100	Insurance & Employee Benefit Funds
525910	Open-End Investment Funds (Form 1120-RIC)
525920	Trusts, Estates, & Agency Accounts
525990	Other Financial Vehicles (including mortgage REITs & closed-end investment funds)

"Offices of Bank Holding Companies" and "Offices of Other Holding Companies" are located under **Management of Companies (Holding Companies).**

Real Estate and Rental and Leasing

Real Estate	
531110	Lessors of Residential Buildings & Dwellings (including equity REITs)
531120	Lessors of Nonresidential Buildings (except Miniwarehouses) (including equity REITs)
531130	Lessors of Miniwarehouses & Self-Storage Units (including equity REITs)
531190	Lessors of Other Real Estate Property (including equity REITs)
531210	Offices of Real Estate Agents & Brokers
531310	Real Estate Property Managers
531320	Offices of Real Estate Appraisers
531390	Other Activities Related to Real Estate
Rental and Leasing Services	
532100	Automotive Equipment Rental & Leasing
532210	Consumer Electronics & Appliances Rental
532281	Formal Wear & Costume Rental
532282	Video Tape & Disc Rental

Forms 5500, 5500-SF, and 5500-EZ Codes for Principal Business Activity (*continued*)

Code	
532283	Home Health Equipment Rental
532284	Recreational Goods Rental
532289	All Other Consumer Goods Rental
532310	General Rental Centers
532400	Commercial & Industrial Machinery & Equipment Rental & Leasing
Lessors of Nonfinancial Intangible Assets (except copyrighted works)	
533110	Lessors of Nonfinancial Intangible Assets (except copyrighted works)
Professional, Scientific, and Technical Services	
Legal Services	
541110	Offices of Lawyers
541190	Other Legal Services
Accounting, Tax Preparation, Bookkeeping, and Payroll Services	
541211	Offices of Certified Public Accountants
541213	Tax Preparation Services
541214	Payroll Services
541219	Other Accounting Services
Architectural, Engineering, and Related Services	
541310	Architectural Services
541320	Landscape Architecture Services
541330	Engineering Services
541340	Drafting Services
541350	Building Inspection Services
541360	Geophysical Surveying & Mapping Services
541370	Surveying & Mapping (except Geophysical) Services
541380	Testing Laboratories
Specialized Design Services	
541400	Specialized Design Services (including interior, industrial, graphic, & fashion design)
Computer Systems Design and Related Services	
541511	Custom Computer Programming Services
541512	Computer Systems Design Services
541513	Computer Facilities Management Services
541519	Other Computer Related Services
Other Professional, Scientific, and Technical Services	
541600	Management, Scientific, & Technical Consulting Services
541700	Scientific Research & Development Services
541800	Advertising & Related Services
541910	Marketing Research & Public Opinion Polling
541920	Photographic Services
541930	Translation & Interpretation Services
541940	Veterinary Services
541990	All Other Professional, Scientific, & Technical Services
Management of Companies (Holding Companies)	
551111	Offices of Bank Holding Companies
551112	Offices of Other Holding Companies

Code	
Administrative and Support and Waste Management and Remediation Services	
Administration and Support Services	
561110	Office Administrative Services
561210	Facilities Support Services
561300	Employment Services
561410	Document Preparation Services
561420	Telephone Call Centers
561430	Business Service Centers (including private mail centers & copy shops)
561440	Collection Agencies
561450	Credit Bureaus
561490	Other Business Support Services (including repossession services, court reporting, & stenotype services)
561500	Travel Arrangement & Reservation Services
561600	Investigation & Security Services
561710	Exterminating & Pest Control Services
561720	Janitorial Services
561730	Landscaping Services
561740	Carpet & Upholstery Cleaning Services
561790	Other Services to Buildings & Dwellings
561900	Other Support Services (including packaging & labeling services, & convention & trade show organizers)
Waste Management and Remediation Services	
562000	Waste Management and Remediation Services
Educational Services	
611000	Educational Services (including schools, colleges, & universities)
Health Care and Social Assistance	
Offices of Physicians and Dentists	
621111	Offices of Physicians (except mental health specialists)
621112	Offices of Physicians, Mental Health Specialists
621210	Offices of Dentists
Offices of Other Health Practitioners	
621310	Offices of Chiropractors
621320	Offices of Optometrists
621330	Offices of Mental Health Practitioners (except Physicians)
621340	Offices of Physical, Occupational & Speech Therapists, & Audiologists
621391	Offices of Podiatrists
621399	Offices of all Other Miscellaneous Health Practitioners
Outpatient Care Centers	
621410	Family Planning Centers
621420	Outpatient Mental Health & Substance Abuse Centers
621491	HMO Medical Centers
621492	Kidney Dialysis Centers
621493	Freestanding Ambulatory Surgical & Emergency Centers
621498	All Other Outpatient Care Centers

Code	
Medical and Diagnostic Laboratories	
621510	Medical & Diagnostic Laboratories
Home Health Care Services	
621610	Home Health Care Services
Other Ambulatory Health Care Services	
621900	Other Ambulatory Health Care Services (including ambulance services & blood & organ banks)
Hospitals	
622000	Hospitals
Nursing and Residential Care Facilities	
623000	Nursing & Residential Care Facilities
Social Assistance	
624100	Individual & Family Services
624200	Community Food & Housing, & Emergency & Other Relief Services
624310	Vocational Rehabilitation Services
624410	Child Day Care Services
Arts, Entertainment, and Recreation	
Performing Arts, Spectator Sports, and Related Industries	
711100	Performing Arts Companies
711210	Spectator Sports (including sports clubs & racetracks)
711300	Promoters of Performing Arts, Sports, & Similar Events
711410	Agents & Managers for Artists, Athletes, Entertainers, & Other Public Figures
711510	Independent Artists, Writers, & Performers
Museums, Historical Sites, and Similar Institutions	
712100	Museums, Historical Sites, & Similar Institutions
Amusements, Gambling, and Recreation Industries	
713100	Amusement Parks & Arcades
713200	Gambling Industries
713900	Other Amusement & Recreation Industries (including golf courses, skiing facilities, marinas, fitness centers, & bowling centers)
Accommodation and Food Services	
Accommodation	
721110	Hotels (except Casino Hotels) & Motels
721120	Casino Hotels
721191	Bed & Breakfast Inns
721199	All other Traveler Accommodation
721210	RV (Recreational Vehicle) Parks & Recreational Camps
721310	Rooming and Boarding Houses, Dormitories, and Workers' Camps
Food Services and Drinking Places	
722300	Special Food Services (including food service contractors & caterers)
722410	Drinking Places (Alcoholic Beverages)
722511	Full-Service Restaurants
722513	Limited-Service Restaurants
722514	Cafeterias and Buffets
Beverage Bars	
722515	Snack and Non-alcoholic Beverage Bars

Code	
Other Services	
Repair and Maintenance	
811110	Automotive Mechanical, & Electrical Repair & Maintenance
811120	Automotive Body, Paint, Interior, & Glass Repair
811190	Other Automotive Repair & Maintenance (including oil change & lubrication shops & car washes)
811210	Electronic & Precision Equipment Repair & Maintenance
811310	Commercial & Industrial Machinery & Equipment (except Automotive & Electronic) Repair & Maintenance
811410	Home & Garden Equipment & Appliance Repair & Maintenance
811420	Reupholstery & Furniture Repair
811430	Footwear & Leather Goods Repair
811490	Other Personal & Household Goods Repair & Maintenance
Personal and Laundry Services	
812111	Barber Shops
812112	Beauty Salons
812113	Nail Salons
812190	Other Personal Care Services (including diet & weight reducing centers)
812210	Funeral Homes & Funeral Services
812220	Cemeteries & Crematories
812310	Coin-Operated Laundries & Drycleaners
812320	Drycleaning & Laundry Services (except Coin-Operated)
812330	Linen & Uniform Supply
812910	Pet Care (except Veterinary) Services
812920	Photofinishing
812930	Parking Lots & Garages
812990	All Other Personal Services
Religious, Grantmaking, Civic, Professional, and Similar Organizations	
813000	Religious, Grantmaking, Civic, Professional, & Similar Organizations (including condominium and homeowners associations)
813930	Labor Unions and Similar Labor Organizations
921000	Governmental Instrumentality or Agency

LIST OF PLAN CHARACTERISTIC CODES FOR LINES 8a AND 8b

CODE	Defined Benefit Pension Features
1A	Benefits are primarily pay related.
1B	Benefits are primarily flat dollar (includes dollars per year of service).
1C	Cash balance or similar plan – Plan has a "cash balance" formula. For this purpose, a "cash balance" formula is a benefit formula in a defined benefit plan by whatever name (for example, personal account plan, pension equity plan, life cycle plan, cash account plan, etc.) that rather than, or in addition to, expressing the accrued benefit as a life annuity commencing at normal retirement age, defines benefits for each employee in terms more common to a defined contribution plan such as a single sum distribution amount (for example, 10% of final average pay times years of service, or the amount of the employee's hypothetical account balance).
1D	Floor-offset plan – to offset for retirement benefits provided by an employer-sponsored defined contribution plan.
1E	Code section 401(h) arrangement – Plan contains separate accounts under Code section 401(h) to provide employee health benefits.
1F	Code section 414(k) arrangement – Benefits are based partly on the balance of the separate account of the participant (also include appropriate defined contribution pension feature codes).
1G	Variable annuity benefit formula – any benefit formula under a defined benefit plan which provides that the amount payable is periodically adjusted by reference to the difference between a rate of return and a specified assumed interest rate.
1H	Single-employer plan covered by PBGC that was terminated and closed out for PBGC purposes – Before the end of the plan year (or a prior plan year), (1) the plan terminated in a standard (or distress) termination and completed the distribution of plan assets in satisfaction of all benefit liabilities (or all ERISA Title IV benefits for distress termination); or (2) a trustee was appointed for a terminated plan under ERISA section 4042.
1I	Frozen plan – As of the last day of the plan year, the plan provides that no participant will get any new benefit accrual (whether because of service or compensation).
1J	Multiemployer plan covered by PBGC that was terminated by mass withdrawal in accordance with ERISA section 4041A(a)(2) during the plan year or in a prior plan year.
1K	Multiemployer plan covered by PBGC that was terminated by plan amendment in accordance with ERISA section 4041A(a)(1) during the plan year or in a prior plan year.
1L	Multiemployer plan covered by PBGC that became insolvent as defined in ERISA Sec 4245(b) during the plan year or in a prior plan year and was still insolvent as of the end of the plan year.

CODE	Defined Contribution Pension Features
2A	Use this code if employer contributions in the return year were based on one of the following allocation types: Age/service weighted or new comparability or similar plan – Age/service weighted plan: Allocations are based on age, service, or age and service. New comparability or similar plan: Allocations are based on participant classifications and a classification(s) consists entirely or predominantly of highly compensated employees; or the plan provides an additional allocation rate on compensation above a specified threshold, and the threshold or additional rate exceeds the maximum threshold or rate allowed under the permitted disparity rules of Code section 401(l).
2B	Target benefit plan.
2C	Money purchase (other than target benefit) plan.
2D	Offset plan – Plan benefits are subject to offset for retirement benefits provided in another plan or arrangement of the employer.
2E	Profit-sharing plan.
2F	ERISA section 404(c) plan – This plan, or any part of it, is intended to meet the conditions of 29 CFR 2550.404c-1.
2G	Total participant-directed account plan – Participants have the opportunity to direct the investment of all the assets allocated to their individual accounts, regardless of whether 29 CFR 2550.404c-1 is intended to be met.
2H	Partial participant-directed account plan – Participants have the opportunity to direct the investment of a portion of the assets allocated to their individual accounts, regardless of whether 29 CFR 2550.404c-1 is intended to be met.
2I	Stock bonus.
2J	Code section 401(k) feature – A cash or deferred arrangement described in Code section 401(k) that is part of a qualified defined contribution plan that provides for an election by employees to defer part of their compensation or receive these amounts in cash.
2K	Code section 401(m) arrangement – Employee contributions are allocated to separate accounts under the plan or employer contributions are based, in whole or in part, on employee deferrals or contributions to the plan. Not applicable if plan is a Code section 401(k) plan with only QNECs and/or QMACs. Also not applicable if plan is a Code section 403(b)(1), 403(b)(7), or 408 arrangement/accounts annuities.
2L	An annuity contract purchased by Code section 501(c)(3) organization or public school as described in Code section 403(b)(1) arrangement."
2M	Custodial accounts for regulated investment company stock as described in Code section 403(b)(7).
2N	Code section 408 accounts and annuities – See Limited Pension Plan Reporting instructions for pension plan utilizing Code section 408 individual retirement accounts or annuities as the funding vehicle for providing benefits.
2O	ESOP other than a leveraged ESOP.
2P	Leveraged ESOP – An ESOP that acquires employer securities with borrowed money or other debt-financing techniques.
2Q	The employer maintaining this ESOP is an S corporation.

LIST OF PLAN CHARACTERISTICS CODES FOR LINES 8a AND 8b

CODE	Defined Benefit Pension Features
1A	Benefits are primarily pay related.
1B	Benefits are primarily flat dollar (includes dollars per year of service).
1C	Cash balance or similar plan – Plan has a "cash balance" formula. For this purpose, a "cash balance" formula is a benefit formula in a defined benefit plan by whatever name (for example, personal account plan, pension equity plan, life cycle plan, cash account plan, etc.) that rather than, or in addition to, expressing the accrued benefit as a life annuity commencing at normal retirement age, defines benefits for each employee in terms more common to a defined contribution plan such as a single sum distribution amount (for example, 10% of final average pay times years of service, or the amount of the employee's hypothetical account balance).
1D	Floor-offset plan – to offset for retirement benefits provided by an employer-sponsored defined contribution plan.
1E	Code section 401(h) arrangement – Plan contains separate accounts under Code section 401(h) to provide employee health benefits.
1F	Code section 414(k) arrangement – Benefits are based partly on the balance of the separate account of the participant (also include appropriate defined contribution pension feature codes).
1H	Plan covered by PBGC that was terminated and closed out for PBGC purposes – Before the end of the plan year (or a prior plan year), (1) the plan terminated in a standard (or distress) termination and completed the distribution of plan assets in satisfaction of all benefit liabilities (or all ERISA Title IV benefits for distress termination); or (2) a trustee was appointed for a terminated plan pursuant to ERISA section 4042.
1I	Frozen plan – As of the last day of the plan year, the plan provides that no participant will get any new benefit accrual (whether because of service or compensation).
CODE	**Defined Contribution Pension Features**
2A	Use this code if employer contributions in the return year were based on one of the following allocation types: Age/service weighted or new comparability or similar plan – Age/service weighted plan: Allocations are based on age, service, or age and service. New comparability or similar plan: Allocations are based on participant classifications and a classification(s) consists entirely or predominantly of highly compensated employees; or the plan provides an additional allocation rate on compensation above a specified threshold, and the threshold or additional rate exceeds the maximum threshold or rate allowed under the permitted disparity rules of Code section 401(l).
2B	Target benefit plan.
2C	Money purchase (other than target benefit) plan.
2D	Offset plan – Plan benefits are subject to offset for retirement benefits provided in another plan or arrangement of the employer.
2E	Profit-sharing plan.
2F	ERISA section 404(c) plan – This plan, or any part of it, is intended to meet the conditions of 29 CFR 2550.404c-1.
2G	Total participant-directed account plan – Participants have the opportunity to direct the investment of all the assets allocated to their individual accounts, regardless of whether 29 CFR 2550.404c-1 is intended to be met.
2H	Partial participant-directed account plan – Participants have the opportunity to direct the investment of a portion of the assets allocated to their individual accounts, regardless of whether 29 CFR 2550.404c-1 is intended to be met.
2I	Stock bonus.
2J	Code section 401(k) feature – A cash or deferred arrangement described in Code section 401(k) that is part of a qualified defined contribution plan that provides for an election by employees to defer part of their compensation or receive these amounts in cash.
2K	Code section 401(m) arrangement – Employee contributions are allocated to separate accounts under the plan or employer contributions are based, in whole or in part, on employee deferrals or contributions to the plan. Not applicable if plan is a Code section 401(k) plan with only QNECs and/or QMACs. Also not applicable if plan is a Code section 403(b)(1), 403(b)(7), or 408 arrangement/accounts annuities.
2L	An annuity contract purchased by Code section 501(c)(3) organization or public school as described in Code section 403(b)(1) arrangement."
2M	Custodial accounts for regulated investment company stock as described in Code section 403(b)(7).
2N	Code section 408 accounts and annuities – See Limited Pension Plan Reporting instructions for pension plan utilizing Code section 408 individual retirement accounts or annuities as the funding vehicle for providing benefits.
2O	ESOP other than a leveraged ESOP.
2P	Leveraged ESOP – An ESOP that acquires employer securities with borrowed money or other debt-financing techniques.
2Q	The employer maintaining this ESOP is an S corporation.
2R	Participant-directed brokerage accounts provided as an investment option under the plan.
2S	401(k) plan or 403(b) plan that provides for automatic enrollment in plan that has elective contributions deducted from payroll.
2T	Total or partial participant-directed account plan – plan uses default investment account for participants who fail to direct assets in their account.
2U	Multiple-employer pension plan sponsored by a bona fide group or association of employers that is an Association Retirement Plan that meets all the conditions under 29 CFR 2510.3-55(b).
2V	Multiple-employer pension plan that is a Professional Employer Organization Plan (PEO Plan) that meets all the conditions under 29 CFR 2510.3-55(c).
2W	Multiple-employer pension plan that is a pooled employer plan that meets the definition under ERISA section 3(43).

LIST OF PLAN CHARACTERISTIC CODES FOR LINES 8a AND 8b (Continued)

2R	Participant-directed brokerage accounts provided as an investment option under the plan.
2S	401(k) plan or 403(b) plan that provides for automatic enrollment in plan that has elective contributions deducted from payroll.
2T	Total or partial participant-directed account plan – plan uses default investment account for participants who fail to direct assets in their account.
2U	Multiple-employer pension plan sponsored by a bona fide group or association of employers that is an Association Retirement Plan that meets all the conditions under 29 CFR 2510.3-55(b).
2V	Multiple-employer pension plan that is a Professional Employer Organization Plan (PEO Plan) that meets all the conditions under 29 CFR 2510.3-55(c).
2W	Multiple-employer pension plan that is a pooled employer plan that meets the definition under ERISA section 3(43).
2X	Multiple-employer defined contribution pension plan that does not fall under characteristic codes 2U, 2V or 2W.
2Y	Pension-linked emergency savings account – A short-term savings account established as part of the plan in accordance with ERISA section 801.
CODE	**Other Pension Benefit Features**
3B	Use this code if the plan covered self-employed individuals in the return year.
3C	Plan not intended to be qualified - A plan not intended to be qualified under Code sections 401, 403, or 408.
3D	Pre-approved pension plan - A pre-approved plan under sections 401, 403(a), 403(b), and 4975(e)(7) of the Code that is subject to a favorable opinion letter from the IRS.
3F	Plan sponsor(s) received services of leased employees, as defined in Code section 414(n), during the plan year.
3H	Plan sponsor(s) is (are) a member(s) of a controlled group under Code section 414(b) or (c) or of an affiliated service group under section 414(m).
3I	Plan requiring that all or part of employer contributions be invested and held, at least for a limited period, in employer securities.
3J	U.S.-based plan that covers residents of Puerto Rico and is qualified under both Code section 401 and section 1165 of the Internal Revenue Code of Puerto Rico.
CODE	**Welfare Benefit Features**
4A	Health (other than vision or dental).
4B	Life insurance.
4C	Supplemental unemployment.
4D	Dental.
4E	Vision.
4F	Temporary disability (accident and sickness).
4G	Prepaid legal.
4H	Long-term disability.
4I	Severance pay.
4J	Apprenticeship and training.
4K	Scholarship (funded).
4L	Death benefits (include travel accident but not life insurance).
4P	Taft-Hartley Financial Assistance for Employee Housing Expenses.
4Q	Other.
4R	Unfunded, fully insured, or combination unfunded/fully insured welfare plan that will not file an annual report for next plan year under 29 CFR 2520.104-20.
4S	Unfunded, fully insured, or combination unfunded/fully insured welfare plan that stopped filing annual reports in an earlier plan year under 29 CFR 2520.104-20.
4T	10 or more employer plan under Code section 419A(f)(6).
4U	Collectively-bargained welfare benefit arrangement under Code section 419A(f)(5).

Exhibit 2: Schedule H mapping document

The following is the mapping summary from the Merrill Revalued Trust Statement to the Schedule H for the end-of-year assets. Please use the prior year Schedule H that was filed with the IRS in order to determine the beginning-of-year assets, or if this is a new plan, the beginning-of-year assets will be zero.

Naming conventions used to identify the line item to be mapped from the trust statement to Schedule H:

- For Statement of Assets section only: Section of Trust Statement\Total Market Value of Line Item Type
- For all other statement sections: Section of Trust Statement\Statement Sub Category\Statement Line Item

ITEM NUMBER	SCHEDULE H ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO SCHEDULE H END-OF-YEAR GENERAL MAPPING SUMMARY
ASSET SUMMARY		
ASSETS		
1a	Total noninterest-bearing cash	Revalued Statement of Assets\Pending Settlement Fund Market Value
1b	**Receivables (less allowance for doubtful accounts)**	
1b(1)	Employer contributions	Amount confirmed by auditor or plan sponsor if applicable
1b(2)	Participant contributions	Amount confirmed by auditor or plan sponsor if applicable
1b(3)	Other	Amount confirmed by auditor or plan sponsor if applicable
1c	**General investments**	
1c(1)	Interest-bearing cash (including money market accounts and certificates of deposit)	Revalued Statement of Assets\Total Market Value of All Money Market Investments + Revalued Statement of Assets\Accrued Income Market Value + Revalued Statement of Assets\Cash Market Value + Revalued Statement of Assets \ Cert of Deposit / Bank Deposit \ Total Market Value + Revalued Statement of Assets\Uninvested Cash
1c(2)	U.S. government securities	N/A
1c(3)	**Corporate debt instruments (other than employer securities)**	
1c(3)(A)	Preferred	Revalued Statement of Assets\Total Market Value of All Preferred Corporate Debt Investments
1c(3)(B)	All other	Revalued Statement of Assets\Total Market Value of All Other Corporate Debt Investments
1c(4)	**Corporate stocks**	
1c(4)(A)	Preferred	Revalued Statement of Assets\Total Market Value of All Non Employer Related Corporate Preferred Stock Investments
1c(4)(B)	Common	Revalued Statement of Assets\Total Market Value of All Non Employer Related Corporate Common Stock Investments
1c(5)	Partnership/joint venture interests	N/A
1c(6)	Real estate (other than employer real property)	N/A
1c(7)	Loans (other than to participants)	N/A
1c(8)	Participant loans	Revalued Statement of Assets\Total Market Value of Loan Fund - Total Deemed Loans
1c(9)	Value of interest in common/collective trusts	Revalued Statement of Assets\Total Market Value of All Common\Collective Trust Investments

ITEM NUMBER	SCHEDULE H ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO SCHEDULE H END-OF-YEAR GENERAL MAPPING SUMMARY
1c(10)	Value of interest in pooled separate accounts	Revalued Statement of Assets\Total Market Value of Pooled Separate Accounts
1c(11)	Value of interest in master trust investment accounts	N/A
1c(12)	Value of interest in 103-12 investment entities	N/A
1c(13)	Value of interest in registered investment companies (for example, mutual funds)	Revalued Statement of Assets\Total Market Value of All Mutual Funds
1c(14)	Value of funds held in insurance company general account (unallocated contracts)	N/A
1c(15)	Other	Revalued Statement of Assets\Total Market Value of All Investments Labeled as 'Other Assets'
1d	**Employer-related investments**	
1d(1)	Employer securities	Revalued Statement of Assets\Total Market Value of All Employer Securities Investments
1d(2)	Employer real property	N/A
1e	Buildings and other property used in plan operation	N/A
1f	Total assets (add all amounts in lines 1a through 1e)	Total assets (add all amounts in lines 1a through 1e)
LIABILITIES		
1g	Benefit claims payable	Amount confirmed by auditor or plan sponsor if applicable
1h	Operating payables	Amount confirmed by auditor or plan sponsor if applicable
1i	Acquisition indebtedness	Amount confirmed by auditor or plan sponsor if applicable
1j	Other liabilities	Amount confirmed by auditor or plan sponsor if applicable
1k	Total liabilities (add all amounts in lines 1g through 1j)	Total liabilities (add all amounts in lines 1g through 1j)
NET ASSETS		
1l	Net assets (subtract line 1k from line 1f)	Net assets (subtract line 1k from line 1f)
INCOME SUMMARY		
***Please be careful when adding and subtracting positive and negative amounts.**		
INCOME		
2a	Contributions:	
2a(1)	Received or receivable in cash from:	
2a(1)(A)	Employers	Revalued Summary of Account\Contributions\Employer Contributions + Employer Contribution Receivables End of Year (5500 Assets Item # 1b(1)(b)) - Employer Contribution Receivables Beginning of Year (5500 Assets Item # 1b(1)(a))
2a(1)(B)	Participants	Revalued Summary of Account\Contributions\Employee Contributions + Employee Contribution Receivables End of Year (5500 Assets Item # 1b(2)(b)) - Employee Contribution Receivables Beginning of Year (5500 Assets Item # 1b(2)(a))

ITEM NUMBER	SCHEDULE H ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO SCHEDULE H END-OF-YEAR GENERAL MAPPING SUMMARY
2a(1)(C)	Others (including rollovers)	Revalued Summary of Account\Contributions\Rollover Contributions + Other Contribution Receivables End of Year (5500 Assets Item # 1b(3)(b)) - Other Contribution Receivables Beginning of Year (5500 Assets Item # 1b(3)(a))
2a(2)	Noncash contributions	Revalued Summary of Account\Contributions\Non-Cash Employee Contributions + Revalued Summary of Account\Contributions\Non-Cash Employer Contributions
2a(3)	Total contributions. Add lines 2a(1)(A), (B), (C) and line 2a(2)	Total contributions. Add lines 2a(1)(A), (B), (C) and line 2a(2)
2b	Earnings on investments	
2b(1)	Interest:	
2b(1)(A)	Interest bearing cash (including money market accounts and certificates of deposit)	Revalued Summary of Account\Investment Income\Income Earned on Cash this Period + Revalued Statement of Changes\Investment Income\Dividends (Sum Dividends for all Money Market and CD Investments ONLY) + Revalued Statement of Changes\Investment Income\Earnings (Sum of Earnings for all CD Investments ONLY)
2b(1)(B)	US Gov't securities	N/A
2b(1)(C)	Corporate debt instruments	N/A
2b(1)(D)	Loans (other than to participants)	N/A
2b(1)(E)	Participant loans	Revalued Summary of Account\Investment Income\Loan Repayment Interest
2b(1)(F)	Other	N/A
2b(1)(G)	Total interest. Add lines 2b(1)(A) through (F)	Total interest. (Add lines 2b(1)(A) through (F)
2b(2)	Dividends	
2b(2)(A)	Preferred stock	Revalued Summary of Account\Investment Income\Preferred Stock Dividends
2b(2)(B)	Common stock	Revalued Summary of Account\Investment Income\Common Stock Dividends
2b(2)(C)	Registered investment company shares (e.g. mutual funds)	Revalued Statement of Changes\Investment Income\Dividends (Sum Dividends for all Mutual Fund Investments ONLY)
2b(2)(D)	Total dividends. Add lines 2b(2)(A), (B) and (C)	Total dividends. Add lines 2b(2)(A), (B) and (C)
2b(3)	Rents	N/A
2b(4)	Net gain (loss) on sale of assets:	
2b(4)(A)	Aggregate proceeds	Revalued Disposition of Assets Summary\Summary of Cash Dispositions\Total Proceeds of Sales (Sum all Investment Types EXCEPT Common\Collective Trusts, Mutual Funds and Loans)
2b(4)(B)	Aggregate carrying amount (see instructions)	Revalued Disposition of Assets Summary\Summary of Cash Dispositions\Revalued Cost/Book Value (Sum all Investment Types EXCEPT Common\Collective Trusts, Mutual Funds, and Loans)
2b(4)(C)	Subtract line 2b(4)(B) from line 2b(4)(A) and enter result	Subtract line 2b(4)(B) from line 2b(4)(A) and enter result
2b(5)	**Unrealized appreciation (depreciation) of assets**	
2b(5)(A)	Real estate	N/A

ITEM NUMBER	SCHEDULE H ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO SCHEDULE H END-OF-YEAR GENERAL MAPPING SUMMARY
2b(5)(B)	Other	Revalued Statement of Changes\Investment Income\Total Unrealized Appreciation (Depreciation) (Sum all Stock Investments ONLY) + Revalued Statement of Changes\Investment Income\Total Unrealized Appreciation (Depreciation) (Sum all 'Other Assets' [according to statement of assets] Investments ONLY)
2b(5)(C)	Total unrealized appreciation of assets. Add lines 2b(5)(A) and (B)	Total unrealized appreciation of assets. Add lines 2b(5)(A) and (B)
2b(6)	Net investment gain (loss) from common/collective trusts	Revalued Statement of Changes\Investment Income\Dividends (Sum Dividends for all Common\Collective Trust Investments ONLY) + Revalued Statement of Changes\Investment Income\Realized Gain(Loss) (Sum Realized Gain(Loss) for all Common\Collective Trust Investments ONLY) + Revalued Statement of Changes\Investment Income\Unrealized Appreciation(Depreciation) (Sum Unrealized Appreciation(Depreciation) for all Common\Collective Trust Investments ONLY)+ Fair value adjustment for any fully benefit responsive investments
2b(7)	Net investment gain (loss) from pooled separate accounts	Revalued Summary of Account\Investment Income\Insurance Contract Income + Revalued Statement of Changes\Investment Income\Unrealized Appreciation(Depreciation)(Sum Unrealized Appreciation(Depreciation) for all Pooled Separate Accounts ONLY)
2b(8)	Net investment gain (loss) from master trust investment accounts	N/A
2b(9)	Net investment gain (loss) from 103-12 investment entities	N/A
2b(10)	Net investment gain (loss) from registered investment companies (e.g. mutual funds)	Revalued Statement of Changes\Investment Income\Realized Gain(Loss) (Sum Realized Gain(Loss) for all Mutual Fund Investments ONLY) + Revalued Statement of Changes\Investment Income\Unrealized Appreciation(Depreciation) (Sum Unrealized Appreciation(Depreciation) for all Mutual Fund Investments ONLY)

ITEM NUMBER	SCHEDULE H ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO SCHEDULE H END-OF-YEAR GENERAL MAPPING SUMMARY
2c	Other income	Revalued Statement of Changes\Other Credits\Other Credits (Plan Total) + Revalued Statement of Changes\Other Credits\Affiliated Plan Transfers (Plan Total) + Revalued Statement of Changes\Other Credits\Forfeiture Reallocation (Plan Total) + Revalued Statement of Changes\Other Credits\Securities Received (Plan Total) + Revalued Statement of Changes\Other Credits\Loan Repayment Principal (Plan Total) + Revalued Statement of Changes\Other Debits\ Loans Issued (Plan Total) + Revalued Statement of Changes\Other Credits\Interfund Transfers (Plan Total) + Revalued Statement of Changes\Other Debits\Interfund Transfers (Plan Total) + Revalued Statement of Changes\Other Debits\Securities Delivered (Plan Total) + Revalued Summary of Account\Investment Income\Other Income (Less CDs Other Income Not Separately Identified on Trust Statement)
2d	Total income. Add all income amounts in column (b) and enter total	Total Income
EXPENSES		
2e	Benefit payment and payments to provide benefits	
2e(1)	Directly to participants or beneficiaries, including direct rollovers	Revalued Statement of Changes\Benefit Payments\Sum All Types (Plan Total) + Revalued Summary of Account\Benefit Payments\Other Disbursements – Offsets of Loans Deemed in a Prior Year - Corrective Distributions (Not Separately Identified on Trust Statement) - Revalued Summary of Account\Other Credits\Net Unclaimed Funds Forfeited
2e(2)	To insurance carriers for the provision of benefits	N\A
2e(3)	Other	
2e(4)	Total benefit payments. Add lines 2(e)(1) through (3)	Total benefit payments. Add lines 2(e)(1) through (3)
2f	Corrective distributions	Total Amount of Corrective Distributions (Not Separately Identified on Trust Statement)(Should only pull in 454/25s)
2g	Certain deemed distributions of participant loans (see instructions)	Total Amount of Loan Deems (Not Separately Identified on Trust Statement)
2h	Interest expense	N\A
2i	Administrative expenses	
2i(1)	Salaries and allowances	Not Separately Identified on Trust Statement
2i(2)	Contract administrator fees	Not Separately Identified on Trust Statement
2i(3)	Recordkeeping fees	Not Separately Identified on Trust Statement
2i(4)	IQPA audit fees	Not Separately Identified on Trust Statement
2i(5)	Investment advisory and management fees	Not Separately Identified on Trust Statement
2i(6)	Bank or trust company trustee/custodial fees	Not Separately Identified on Trust Statement
2i(7)	Actuarial fees	Not Separately Identified on Trust Statement
2i(8)	Legal fees	Not Separately Identified on Trust Statement
2i(9)	Valuation/appraisal fees	Not Separately Identified on Trust Statement

ITEM NUMBER	SCHEDULE H ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO SCHEDULE H END-OF-YEAR GENERAL MAPPING SUMMARY
2i(10)	Other trustee fees/expenses	Not Separately Identified on Trust Statement
2i(11)	Other	Not Separately Identified on Trust Statement
2i(12)	Total administrative expenses. Add lines 2i(1) through (11)	Total administrative expenses. Add lines 2i(1) through (4)
2j	Total expenses. Add all expense amounts in column (b) and enter total	Total expenses.
2k	Net income (loss) (subtract line 2j from line 2d)	Net income (loss) (subtract line 2j from line 2d)
2l	Transfers of assets	
2l(1)	To this plan	Revalued Summary of Account\Other Credits\Conversion In + Revalued Statement of Changes\Other Credits\Inter-Plan Transfers (Plan Total)
2l(2)	From this plan	Revalued Summary of Account\Other Debits\Conversion Out + Revalued Statement of Changes\Other Debits\Inter-Plan Transfers (Plan Total)

Exhibit 3: Schedule I mapping document

The following is a general mapping summary from the Merrill revalued trust statement to the Schedule I for the end-of-year assets. Please use the prior-year Schedule I that was filed with the DOL in order to determine the beginning-of-year assets, or if this is a new plan, the beginning-of-year assets will be zero. If Merrill did not complete the Schedule I, please have both the beginning-of-year assets and end-of-year assets completed before starting the income and expenses summary. Please note that deemed loan reporting has been enhanced to more precisely report the activity in your plan.

Naming conventions used to identify the line item to be mapped from the trust statement to Schedule I:

- For Statement of Assets section only: Section of Trust Statement\Total Market Value of Line Item Type
- For all other statement sections: Section of Trust Statement\Statement Sub Category\Statement Line Item
- For the Statement of Changes: All items are mapped from the Plan Totals column.

ITEM NUMBER	SCHEDULE I ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO SCHEDULE I END-OF-YEAR GENERAL MAPPING SUMMARY
1	**Plan Assets and Liabilities:**	
a	Total plan assets	Revalued Statement of Assets\Market Value\Total Assets - Total Deemed Loans + Receivable amount confirmed by auditor or plan sponsor if applicable
b	Total plan liabilities	Payable amount confirmed by auditor or plan sponsor if applicable
c	**Net plan assets (subtract line 1b from line 1a)**	**Difference of Lines (1a - 1b)**
* Please be careful when adding and subtracting positive and negative amounts.		
2	**Income, Expenses, and Transfers for this Plan Year:**	
a	**Contributions received or receivable**	
a(1)	Employers	Revalued Summary of Account\Contributions\Employer Contributions + Employer Contribution Receivables End of Year (amount supplied by auditor or plan sponsor if applicable) - Employer Contribution Receivables Beginning of Year (amount supplied by auditor or plan sponsor if applicable)
a(2)	Participants	Revalued Summary of Account\Contributions\Employee Contributions + Employee Contribution Receivables End of Year (amount supplied by auditor or plan sponsor if applicable) - Employee Contribution Receivables Beginning of Year (amount supplied by auditor or plan sponsor if applicable)
a(3)	Others (including rollovers)	Revalued Summary of Account\Contributions\Rollover Contributions + Other Contribution Receivables End of Year (amount supplied by auditor or plan sponsor if applicable) - Other Contribution Receivables Beginning of Year (amount supplied by auditor or plan sponsor if applicable)
b	Noncash contributions	Revalued Summary of Account\Contributions\Non-Cash Employee Contributions + Revalued Summary of Account\Contributions\Non-Cash Employer Contributions

ITEM NUMBER	SCHEDULE I ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO SCHEDULE I END-OF-YEAR GENERAL MAPPING SUMMARY
c	Other income	Revalued Summary of Account\Investment Income\Income Earned on Cash This Period + Revalued Statement of Changes\Investment Income\Total Investment Income + Revalued Statement of Changes\Other Credits\Inter-Fund Transfers +Revalued Statement of Changes\Other Credits\Loan Repayment Principal + Revalued Statement of Changes\Other Credits\Forfeiture Reallocation + Revalued Statement of Changes\Other Credits\Securities Received\Plan Total + Revalued Statement of Changes\Other Debits\Securities Delivered\Plan Total + Revalued Statement of Changes\Other Credits\Other Credits + Revalued Statement of Changes\Other Debits\Inter-fund Transfers + Revalued Statement of Changes\Other Debits\Loans Issued + Revalued Statement of Changes\Realized Gain (Loss) + Revalued Statement of Changes\Unrealized Appreciation (Depreciation)
d	**Total income (add lines 2a(1), 2a(2), 2a(3), 2b, and 2c)**	**Sum of Lines (2a(1) + 2a(2) + 2a(3) + 2b + 2c)**
e	Benefits paid (including direct rollovers)	Revalued Statement of Changes\Benefit Payments\Sum All Types (Plan Total) + Revalued Summary of Account\Benefit Payments\Other Disbursements - Offsets of Loans Deemed in a Prior Year - Corrective Distributions (Not Separately Identified on Trust Statement) - Revalued Summary of Account\Other Credits\Net Unclaimed Funds Forfeited
f	Corrective distributions (see instructions)	Total Amount of Corrective Distributions (Not Separately Identified on Trust Statement)(Should only pull in 454/25s))
g	Certain deemed distributions of participant loans (see instructions)	Total Amount of Loan Deems (Not Separately Identified on Trust Statement)
h	Administrative service providers (salaries, fees, commissions)	N/A
i	Other expenses	Revalued Summary of Account\ Expenses\Total Expenses + Revalued Summary of Account\Other Debits\Other Debits + Revalued Summary of Account\Other Debits\Interplan Transfers
j	**Total expenses (add lines 2e, 2f, 2g, and 2h)**	**Sum of Lines (2e + 2f + 2g + 2h)**
k	**Net income (loss) (subtract line 2i from line 2d)**	**Difference of Lines (2i - 2d)**
l	Transfers to (from) the plan (see instructions)	Revalued Summary of Account\Other Credits\Conversion-In - Revalued Summary of Account\Other Debits\Conversion Out + Revalued Statement of Changes\Other Credits\Inter-Plan Transfers - Revalued Statement of Changes\Other Debits\Inter-Plan Transfers

Exhibit 4: Form 5500-SF mapping document

The following is a general mapping summary from the Merrill revalued trust statement to the Form 5500-SF for the end-of-year assets. Please use the prior-year financials that were filed with the DOL in order to determine the beginning-of-year assets, or if this is a new plan, the beginning-of-year assets will be zero. If Merrill did not complete the financials, please have both the beginning-of-year assets and end-of-year assets completed before starting the income and expenses summary.

Naming conventions used to identify the line item to be mapped from the trust statement to Form 5500-SF:

- For Statement of Assets section only: Section of Trust Statement\Total Market Value of Line Item Type
- For all other statement sections: Section of Trust Statement\Statement Sub Category\Statement Line Item
- For the Statement of Changes: All items are mapped from the Plan Totals column.

PART III	FORM 5500-SF ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO FORM 5500-SF GENERAL MAPPING SUMMARY
7	**Plan Assets and Liabilities:**	
a	Total plan assets	Revalued Statement of Assets\Market Value\Total Assets - Total Deemed Loans + Receivable amount confirmed by auditor or plan sponsor if applicable
b	Total plan liabilities	Payable amount confirmed by auditor or plan sponsor if applicable
c	**Net plan assets (subtract line 1b from line 1a)**	**Difference of Lines (1a - 1b)**
* Please be careful when adding and subtracting positive and negative amounts.		
8	**Income, Expenses, and Transfers for this Plan Year:**	
a	**Contributions received or receivable from:**	
a(1)	Employers	Revalued Summary of Account\Contributions\Employer Contributions + Employer Contribution Receivables End of Year (amount supplied by auditor or plan sponsor if applicable) - Employer Contribution Receivables Beginning of Year (amount supplied by auditor or plan sponsor if applicable)
a(2)	Participants	Revalued Summary of Account\Contributions\Employee Contributions + Employee Contribution Receivables End of Year (amount supplied by auditor or plan sponsor if applicable) - Employee Contribution Receivables Beginning of Year (amount supplied by auditor or plan sponsor if applicable)
a(3)	Others (including rollovers)	Revalued Summary of Account\Contributions\Rollover Contributions + Other Contribution Receivables End of Year (amount supplied by auditor or plan sponsor if applicable) - Other Contribution Receivables Beginning of Year (amount supplied by auditor or plan sponsor if applicable)

PART III	FORM 5500-SF ITEM DESCRIPTION	MERRILL TRUST STATEMENT TO FORM 5500-SF GENERAL MAPPING SUMMARY
b	Other income	Revalued Summary of Account\Investment Income\Income Earned on Cash This Period + Revalued Statement of Changes\Investment Income\Total Investment Income + Revalued Statement of Changes\Other Credits\Inter-Fund Transfers +Revalued Statement of Changes\Other Credits\Loan Repayment Principal + Revalued Statement of Changes\Other Credits\Forfeiture Reallocation + Revalued Statement of Changes\Other Credits\Securities Received\Plan Total + Revalued Statement of Changes\Other Credits\Other Credits + Revalued Statement of Changes\Other Debits\Inter-fund Transfers + Revalued Statement of Changes\Other Debits\Loans Issued + Revalued Statement of Changes\Other Debits\Securities Delivered\Plan Total + Revalued Statement of Changes\Realized Gain (Loss) + Revalued Statement of Changes\Unrealized Appreciation (Depreciation)
c	**Total income (add lines 8a(1), 8a(2), 8a(3), and 8b)**	**Sum of Lines (8a(1) + 8a(2) + 8a(3) + 8b)**
d	Benefits paid (including direct rollovers and insurance premiums to provide benefits)	Revalued Statement of Changes\Benefit Payments\Sum All Types (Plan Total) + Revalued Summary of Account\Benefit Payments\Other Disbursements - Offsets of Loans Deemed in a Prior Year - Corrective Distributions (Not Separately Identified on Trust Statement) - Revalued Summary of Account\Other Credits\Net Unclaimed Funds Forfeited
e	Certain deemed and/or corrective distributions (see instructions)	Total Amount of Corrective Distributions (Not Separately Identified on Trust Statement))(Should only pull in 454/25s) + Total Amount of Loan Deems (Not Separately Identified on Trust Statement)
f	Administrative service providers (salaries, fees, commissions)	Revalued Summary of Account\ Expenses\Total Expenses
g	Other expenses	Revalued Summary of Account\Other Debits\Other Debits + Revalued Summary of Account\Other Debits\Interplan Transfers
h	**Total expenses (add lines 8d, 8e, 8f, and 8g)**	**Sum of Lines (8d + 8e + 8f + 8g)**
i	**Net income (loss) (subtract line 8h from line 8c)**	**Difference of Lines (8c - 8h)**
j	**Transfers to (from) the plan (see instructions)**	**Revalued Summary of Account\Other Credits\Conversion-In - Revalued Summary of Account\Other Debits\Conversion Out + Revalued Statement of Changes\Other Credits\Inter-Plan Transfers - Revalued Statement of Changes\Other Debits\Inter-Plan Transfers**

Exhibit 5: Form 5500/5500-SF and Form 8955-SSA annual reporting timelines

Plan year-end December 31, 2025 69
Plan year-end January 31, 2026 70
Plan year-end February 28, 2026 71
Plan year-end March 31, 2026 72
Plan year-end April 30, 2026 73
Plan year-end May 31, 2026 74
Plan year-end June 30, 2026 75
Plan year-end July 31, 2026 76
Plan year-end August 31, 2026 77
Plan year-end September 30, 2026 78
Plan year-end October 31, 2026 79
Plan year-end November 30, 2026 80

Plan year-end December 31, 2025

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a calendar plan year end of December 31, 2025, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
January 2026 through April 2026	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**April 16, 2026**
May 2026 through July 2026	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
May 2026 through September 2026	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
July 2026	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
July 2026 through October 2026	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is July 31, 2026. If a Form 5558 is filed timely, the extended filing deadline is October 15, 2026.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	July 31, 2026
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	July 31, 2026
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	September 30, 2026
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	October 15, 2026
December 15, 2026	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	December 15, 2026

Plan year-end January 31, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of Jan. 31, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
February 2026 through May 2026	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**May 15, 2026**
June 2026 through August 2026	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
June 2026 through October 2026	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
August 2026	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
August 2026 through November 2026	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is September 2, 2026. If a Form 5558 is filed timely, the extended filing deadline is November 16, 2026.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	August 31, 2026
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	August 31, 2026
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	November 2, 2026
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	November 16, 2026
January 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	January 15, 2027

Plan year-end February 28, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of Feb. 28, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
March 2026 through June 2026	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**June 15, 2026**
July 2026 through September 2026	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
July 2026 through November 2026	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
September 2026	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
September 2026 through December 2026	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is September 30, 2026. If a Form 5558 is filed timely, the extended filing deadline is December 15, 2026.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	September 30, 2026
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	September 30, 2026
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	November 30, 2026
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	December 15, 2026
February 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	February 15, 2027

Plan year-end March 31, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of March 31, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
April 2026 through July 2026	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**July 17, 2026**
August 2026 through October 2026	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
August 2026 through December 2026	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
October 2026	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
October 2026 through January 2027	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is November 2, 2026. If a Form 5558 is filed timely, the extended filing deadline is January 15, 2027.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	November 2, 2026
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	November 2, 2026
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	December 31, 2026
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	January 15, 2027
March 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	March 15, 2027

Plan year-end April 30, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of April 30, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
May 2026 through August 2026	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**August 17, 2026**
September 2026 through November 2026	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
September 2026 through January 2027	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
November 2026	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
November 2026 through February 2027	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is November 30, 2026. If a Form 5558 is filed timely, the extended filing deadline is February 17, 2027.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	November 30, 2026
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	November 30 2026
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	February 1, 2027
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	February 16, 2027
April 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	April 15, 2027

Plan year-end May 31, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of May 31, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
June 2026 through September 2026	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**September 16, 2026**
October 2026 through December 2026	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
October 2026 through February 2027	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
December 2026	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
December 2026 through March 2027	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is December 31, 2026. If a Form 5558 is filed timely, the extended filing deadline is March 15, 2027.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	December 31, 2026
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	December 31, 2026
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	March 1, 2027
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	March 15, 2027
May 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	May 15, 2027

Plan year-end June 30, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of June 30, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
July 2026 through October 2026	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**October 19, 2026**
November 2026 through January 2027	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
November 2026 through March 2027	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
January 2027	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
January 2027 through April 2027	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is February 1, 2027. If a Form 5558 is filed timely, the extended filing deadline is April 15, 2027.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	February 1, 2027
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	February 1, 2027
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	March 31, 2027
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	April 15, 2027
June 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	June 15, 2027

Plan year-end July 31, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of July 31, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
August 2026 through November 2026	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**November 13, 2026**
December 2026 through February 2027	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
December 2026 through April 2027	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
February 2027	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
February 2027 through May 2027	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is March 1, 2027. If a Form 5558 is filed timely, the extended filing deadline is May 17, 2027.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	March 1, 2027
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	March 1, 2027
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	April 30, 2027
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	May 17, 2027
July 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	July 15, 2027

Plan year-end August 31, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of Aug. 31, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
September 2026 through December 2026	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**December 16, 2026**
January 2027 through March 2027	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
January 2027 through May 2027	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
March 2027	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
March 2027 through June 2027	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is March 31, 2027. If a Form 5558 is filed timely, the extended filing deadline is June 15, 2027.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	March 31, 2027
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	March 31, 2027
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	June 1, 2027
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	June 15, 2027
August 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	August 15, 2027

Plan year-end September 30, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of Sept. 30, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
October 2026 through January 2027	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**January 15, 2027**
February 2027 through April 2027	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
February 2027 through June 2027	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
April 2027	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
April 2027 through July 2027	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is April 30, 2027. If a Form 5558 is filed timely, the extended filing deadline is July 15, 2027.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	April 30, 2027
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	April 30, 2027
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	June 30, 2027
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	July 15, 2027
September 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	September 15, 2027

Plan year-end October 31, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of Oct. 31, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
November 2026 through February 2027	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**February 12, 2027**
March 2027 through May 2027	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
March 2027 through July 2027	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
May 2027	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
May 2027 through August 2027	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is June 1, 2027. If a Form 5558 is filed timely, the extended filing deadline is August 17, 2027.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	June 1, 2027
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	June 1, 2027
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	August 2, 2027
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	August 16, 2027
October 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	October 15, 2027

Plan year-end November 30, 2026

Form 5500/5500-SF and Form 8955-SSA annual reporting timeline

The chart below summarizes our timeline for compiling your Form 5500/5500-SF and/or Form 8955-SSA, if applicable. This summary is based on a plan with a non-calendar plan year end of Nov. 30, 2026, and assumes that you submit complete and accurate information to Merrill within the appropriate timeframe.

Timeframe	Task	Critical dates
December 2026 through March 2027	• We confirm that we have the required documentation and information for Form 5500/5500-SF and Form 8955-SSA compilation.	
	• Bank of America, N.A. mails your plan's Annual Trust Statement package, including auditor materials.	
	• We send you a Form 5500/8955-SSA Questionnaire.	
	• You return the Form 5500/8955-SSA Questionnaire.	
	• We send you the *Employer Plan Annual Revenue Information Report*.	
	• We will file a Form 5558 on behalf of plan sponsors for whom we compile the Form 5500/5500-SF and/or Form 8955-SSA to secure a 2½-month extension to the Form 5500/5500-SF and Form 8955-SSA filing deadline, if applicable.	
	• **Deadline for you to notify Merrill that you do not want the Form 5558 filed on your behalf.**	**March 16, 2027**
April 2027 through June 2027	• We compile Form 5500/5500-SF, related Schedules, Form 8955-SSA, Form 5558 and the Summary Annual Report (SAR).	
April 2027 through August 2027	• Your plan's independent accountant completes an audit of your plan (if required for your Form 5500 filing).	
June 2027	• You file Form 5500/5500-SF and Form 8955-SSA by the end of the seventh month after the plan year-end.	
June 2027 through September 2027	• You continue to review and edit your Form 5500/5500-SF and Form 8955-SSA, as applicable.	
	• The filing due date is June 30, 2027. If a Form 5558 is filed timely, the extended filing deadline is September 15, 2027.	
	• Deadline for you to file the Form 5500/5500-SF (plus applicable schedules) and Form 8955-SSA without extension.	June 30, 2027
	• Deadline for filing the Form 5558 to extend the Form 5500/5500-SF or Form 8955-SSA.	June 30, 2027
	• Deadline for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF, if filing is not on extension).	August 31, 2027
	• Deadline for you to file for the Form 5500/5500-SF and Form 8955-SSA when the forms are placed on extension by filing the Form 5558.	September 15, 2027
November 15, 2027	• Deadline on extension for you to furnish the SAR to participants (two months after the deadline to file the Form 5500/5500-SF on extension).	November 15, 2027