

# COMPLIANCE UPDATES



**2025**  
For retirement plans  
with years ending Dec. 31

	TASK	RESPONSIBILITY	DATE	DESCRIPTION
JANUARY	Review 2026 Plan Limits	Plan Sponsor	Beginning Jan. 1, 2026	Adhere to IRS dollar limitations on benefits and contributions.
	Upload Census and Annual Summary to The Trust Company	Plan Sponsor	Beginning Jan. 1, 2026	Submit census information and Annual Summary for testing of the 2025 plan year.
	Distribute Form 1099-R	The Trust Company	By Friday, Jan. 30, 2026	Provide to all participants who received distributions and/or deemed distributions in the previous year.
FEBRUARY	File Form 1099-R	The Trust Company	To be determined	File Form 1099-R to report distributions and/or deemed distributions made in 2025, if not filing electronically.
	Upload Census and Annual Summary to The Trust Company (if not yet completed)	Plan Sponsor	By Friday, Feb. 6, 2026	Submit census information and Annual Summary for testing of the 2025 plan year.
MARCH	Make Corrective Distributions for Excess 2025 Contributions	The Trust Company	By Monday, March 16, 2026	Process corrective distributions for failed Actual Deferral Percentage (ADP) and Actual Contribution Percentage (ACP) tests to avoid a 10% excise tax.
	Fund Partnership or S-corp Contributions	Plan Sponsor	By Monday, March 1, 2026	Remit plan funding if tax returns are not extended.
APRIL	Make Initial Required Minimum Distributions for 2025	The Trust Company	By Wednesday, April 1, 2026	Required beginning date for participants attaining age 73 or retiring after age 73 in prior year for taking first required minimum distribution (RMD) under IRC Section 401(a)(9) for 2025.
	Request Automatic Extension for Corporate Tax Returns to Oct. 15	Plan Sponsor	By Wednesday, April 15, 2026	File Form 7004.
	Distribute Excess Deferrals (402(g) Refunds)	The Trust Company	By Wednesday, April 15, 2026	Process corrective distributions of 2025 deferrals in excess of \$23,500.
	Fund Self-employed or C-corp Contributions	Plan Sponsor	By Wednesday, April 15, 2026	Remit plan funding if tax returns are not extended.
JUNE	Look for Invitation to Sign Form 5500	Plan Sponsor	Beginning June 1, 2026	The Trust Company will notify you when it's ready.
JULY	Distribute Summary of Material Modifications to Update Summary Plan Description (SPD) for 2025 Plan Amendments	Plan Sponsor	By Wednesday, July 29, 2026	Provide to all participants; due no later than 210 days after the end of the plan year in which the plan change is adopted.
	File Form 5500	The Trust Company/ Plan Sponsor	By Friday, July 31, 2026	File Form 5500; due seven months after plan year ending Dec. 31, unless extension applies.

# 2025 COMPLIANCE UPDATES • *For retirement plans with years ending Dec. 31*

	TASK	RESPONSIBILITY	DATE	DESCRIPTION
JULY	File Form 5558	The Trust Company	By Friday, July 31, 2026	<i>File Form 5558, Application for Extension of Time to File Certain Employee Plan Returns (Form 5500, 5330); due on or before normal due date for filing Form 5500 and/or Form 5330.</i>
	File Form 8955-SSA	The Trust Company	By Friday, July 31, 2026	<i>File Form 8955-SSA; report certain information relating to each participant with a deferred vested benefit.</i>
	File Form 5330	The Trust Company/ Plan Sponsor	By Friday, July 31, 2026	<i>File Form 5330, excise taxes related to employee benefit plans due to IRS (e.g., excise taxes for late test corrections, late deposits of employee deferrals) unless extension applies.</i>
AUGUST	Request Mid-year Projections if Plan Failed Testing in Prior Year	The Trust Company	Beginning Aug. 1, 2026	<i>Notify your Relationship Manager if you would like mid-year projections.</i>
SEPTEMBER	Fund Partnership or S-corp Contributions	Plan Sponsor	By Tuesday, Sept. 15, 2026	<i>Remit plan funding if tax returns are extended.</i>
	Distribute Summary Annual Report (SAR)	Plan Sponsor	By Wednesday, Sept. 30, 2026	<i>Provide to all participants.</i>
OCTOBER	Fund Self-employed or C-corp Contributions	Plan Sponsor	By Thursday, Oct. 15, 2026	<i>Remit plan funding if tax returns are extended.</i>
	File Form 5500 and Form 8955-SSA	The Trust Company/ Plan Sponsor	By Thursday, Oct. 15, 2026	<i>File Form 5500 and Form 8955-SSA for plans with Form 5558 filing extension.</i>
NOVEMBER	Distribute Annual 401(k) Plan Safe Harbor Notice	The Trust Company/ Plan Sponsor	Between Nov. 1-Dec. 1, 2026	<i>Provide to all eligible employees.</i>
	Distribute Qualified Default Investment Alternative (QDIA) Notice	The Trust Company/ Plan Sponsor	Between Nov. 1-Dec. 1, 2026	<i>Provide to all participants (including alternate payees and beneficiaries) to inform of their rights to direct investments and how their accounts will be invested if they do not direct investments.</i>
	Distribute Annual Automatic Enrollment Notice	The Trust Company/ Plan Sponsor	Between Nov. 1-Dec. 1, 2026	<i>Provide to all eligible employees. Can be combined with QDIA notice.</i>
	Distribute 403(b) Annual Contribution Notice	The Trust Company/ Plan Sponsor	Between Nov. 1-Dec. 1, 2026	<i>Provide to all eligible employees.</i>
	Distribute Annual Participant Fee Disclosure Notice	The Trust Company/ Plan Sponsor	Between Nov. 1-Dec. 1, 2026	<i>Provide to all eligible employees.</i>
DECEMBER	Make 2026 Required Minimum Distributions – Age 73	The Trust Company	By Thursday, Dec. 31, 2026	<i>Remit to all participants who have begun receiving minimum distributions.</i>
	Adopt Discretionary Amendments	Plan Sponsor	By Thursday Dec 31, 2026	<i>Formally adopt amendments for any discretionary changes that became effective during the plan year.</i>
	Make Corrective Distributions for Excess 2025 Contributions	The Trust Company	By Thursday, Dec. 31, 2026	<i>Process corrective distributions for failed Actual Deferral Percentage (ADP) and Actual Contribution Percentage (ACP) tests with a 10% excise tax.</i>