2025 Defined Contribution (DC) and Defined Benefit (DB) Annual Compliance for a Calendar Year Plan



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Jan 15	Review forfeitures account; plan to use forfeitures from 2024 by end of 2025 Shortfall for prior year must be funded
Jan 31	Complete 5500 questionnaire Provide 1099-R to recipients of 2024 distributions Provide annual census to RK/TPA Form 945 filing due
Feb 7	DC calculate/Fund true-up if applicable
Feb 14	Deadline to provide Q4 2024 quarterly participant statement Provide triennial benefit statements for DB plans last provided for 2019-2021 period Issue statements for 2022-2024 period to participants
Feb 15	Review/Approve compliance testing results
Feb 28	DB PBGC Form 1-ES for plans < 500 part. • Paper filing of 1099-R to IRS
Mar 1	DC receive corrective distribution info
Mar 15	DC ADP/ACP corrective distribution date DC Profit Sharing due if partnership or S-Corp return filed PS contributions due for prior year unless corporate tax return is extended then due date shifts to September 15 or when return is filed Form 1042 due to report tax withholding on distributions to foreign persons DB minimum funding waiver request for 2024 plan year
Mar 17	Form 1042 filing due*
Mar 31	Electronic filing of 1099-R to IRS Certify 2025 AFTAP to avoid 10% lower presumption than 2024
Apr 1	Request contract from auditor Deadline for RMD if 73 or more than 5% owner during 2024 First time Required Minimum Distribution (RMD) due for any terminated employees who turned 73 during 2024 Actuary's certification of 2025 adjusted funding target attainment percentage (AFTAP) to avoid 10% less presumption than 2024
Apr 7	DC Request force out of de minimis accts
Apr 15	DB Q1 contribution DB PBGC 4010 Notice of Underfunding for 2024 • PBGC 4010 underfunded notice due if plan is less than 80% funded, and neither \$15 million shortfall not small plan waiver apply DC Profit Sharing due if C-Corp return filed Refund 2024 excess 401(k) deferrals to avoid double tax
Apr 30	DB annual funding notice to participants and PBGC for 2024 plan year

Request recordkeeper/TPA audit package
Deadline to provide Q1 2025 guarterly participant statement

DB notices due for plans with benefit restrictions based on 2025 AFTAP

Notices due to plans subject to benefit restrictions on April 1 based upon presumed current year AFTAP indicating plan underfunded

DC 404a-5 Annual Participant Fee Disclosure **May 31**

Obtain data request from auditor DB plans Request to use substitute mortality tables Deadline for plan sponsors to submit IRS request to begin using substitute mortality tables for plan year 2026.

Provide auditor with all data requested Jun 22

Jun 28 DC SEC Form 11-K due plan w company stock

DC EACA deadline for ADP/ACP distributions if failed 2024 ADP/ACP tests

			JULY				AUGUST							
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		SEF	TEME	BER			OCTOBER						
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		NO	VEMB	ER			DECEMBER						
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23	24	25	26	27	28	29	28	29	30	31			

^{*}The date shown is the next business day after the filing date of an IRS or U.S. Department of Labor (DOL) form when the original filing date falls on a Saturday, Sunday, or legal holiday.



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Form CRS and Reg BI Disclosure: https://www.kestrafinancial.com/disclosures

Jul 1 DC Mid-Year compliance testing if applicable

Jul 15 DB Q2 contribution

Jul 29 Deadline to send SMM to participants

Summary of Material Modifications (SMM) which updates the SPD due to plan changes must be provided within 210 says after the plan year ends

File IRS Form 5500 unless extended (5558)

IRS Form 5500 is due July 31 unless you file IRS Form 5558 requesting an extension until October 15

Deadline to file IRS Form 5330 for calendar year plan

- IRS Form 5330 must be filed if you are required to pay excise taxes on prohibited transactions that occurred in 2024
- Annual Benefit Statement for plans not offering participant-directed investment

Jul 31 Form 8955-SSA due for prior year unless extension

Notice to Terminated Vested Employees Provide a notice to terminated vested employees who were reported on 2024 IRS Form 8955-SSA showing their vested accrued benefit. Annual Benefit Statement for plans not offering participant-directed investment Small plan annual funding notice Provide 2024 annual funding notice (AFN) to participants, beneficiaries, labor organizations representing participants and beneficiaries, and the PBGC. A notice to the PBGC is not required if the plan has less than \$50 million in underfunding.

Aug 14 Deadline to provide Q2 2025 quarterly participant statement

Sept 15 DB balance of minimum contribution prior year

Minimum funding contribution for money pension purchase plan for 2024 plan year

DB elect to use credit balances for prior year

DB elect to credit excess contributions

DB revoke election to use excess credit balance

DB plans must elect how they want to treat excess credit balances/contributions

Extended deadline for partnership and S-Corp income tax returns PBGC Comprehensive Premium Filing File 2025 PBGC Comprehensive Premium Filing and pay the flat-rate and variable-rate premiums. The Bipartisan Budget Act of 2015 accelerated the premium due date by one month for the 2025 plan year. The premium due date will return to October 15 in 2026.

The Bipartisan Budget Act of 2015 accelerated the PBGC premium due date to September 15 for the 2025 plan year. The premium due date will return to October 15 in 2026.

Sept 30 Distribute SAR is 5500 filed timely

DC Summary Annual Report (SAR) must be provided to participants unless you filed extension then its due December

DB actuary AFTAP certification to avoid less than 60% presumption

DB Last day to certify current year AFTAP to avoid presumption AFTAP is less than 60% - backup date is 12/31 if not completed

Oct 1 DC determine RK amendment deadline

Oct 3 Earliest date to provide Automatic Enrollment Notices and Safe Harbor Notices

Oct 7 DC Request force out of de minimis accts

Oct 15 DB PBGC premium filing for current plan year

DB notices are due for plans subject to benefit restrictions on Oct 1 based upon presumption current year AFTAP is less than 60%

DC deadline for correction of 410(b) or 401(a)(4) test failure

DC deadline for adopting a retroactive amendment to correct failed 410(b) coverage or 401(a)(4) nondiscrimination failure

Extended deadline for C-Corp income tax returns

File IRS Forms 5500/8955-SSA if extended DB Q3Contribution Annual Benefit Statements (no participant direction)

Corrective Plan Amendment Deadline to adopt a retroactive corrective plan amendment(s) for 2024 plan failures

Oct 31 DB notices due for benefit restricted plans

Nov 1 Plan document review

· Operations Review

Nov 14 Deadline to provide Q3 2025 quarterly participant statement

Nov 15 Ensure annual notices set for delivery

Ensure delivery of all required annual notices is in process (DC = Safe Harbor, Auto, QDIA)(DB - Annual unless Triennial elected)

Amend plan to add/discontinue safe harbor

Dec 1 Last day to distribute annual safe harbor, auto-enrollment, QDIA notices to participants

Ensure RMD's set to be processed

QDIA Notices Deadline to send QDIA notices to participants for the 2025 plan year

Safe Harbor Notices Deadline to provide to participants §401(k) or §403(b) plan safe harbor notices, if applicable for the 2025 plan year.

Dec 16 Distribute SAR if 5500 extension filed

Review IRS dollar limits for 2026, notify payroll

DB election to reduce next year credit balance

DB actuary AFTAP certification to avoid less than 60% presumption from applying Jan. 1, 2026 DB plans must determine what to do with credit balances, certify AFTAP if not done by Oct. 1, to avoid

less than 60% assumption Jan. 1, 2026

Deadline to correct failed 2024 ADP/ACP (if not already corrected)

DMDs due to participante who already r