

2025

Instructions for Form 5500

Annual Return/Report of Employee Benefit Plan

Code section references are to the Internal Revenue Code unless otherwise noted. ERISA refers to the Employee Retirement Income Security Act of 1974.

EFAST2 Processing System

Your 2025 Form 5500 must be electronically filed in the ERISA Filing Acceptance System (EFAST2). For more information, see the instructions for *Electronic Filing Requirement* and the EFAST2 website at www.efast.dol.gov. You cannot file a paper Form 5500 by mail or other delivery service.

About the Form 5500

The Form 5500, Annual Return/Report of Employee Benefit Plan, including all required schedules and attachments (Form 5500 return/report), is used to report information concerning employee benefit plans and Direct Filing Entities (DFEs). Any administrator or sponsor of an employee benefit plan subject to ERISA must file information about each benefit plan every year (under Code section 6058(a) and ERISA sections 104 and 4065). Some plans participate in certain trusts, accounts, and other investment arrangements that file a Form 5500 Annual Return/Report as DFEs. See *Who Must File* and *When To File*.

The Internal Revenue Service (IRS), Department of Labor (DOL), and Pension Benefit Guaranty Corporation (PBGC) have consolidated certain returns and report forms to reduce the filing burden for plan administrators and employers. Employers and administrators who comply with the instructions for the Form 5500 generally will satisfy the annual reporting requirements for the IRS and DOL.

Defined contribution and defined benefit pension plans may have to file additional information with the IRS including Form 5330, Return of Excise Taxes Related to Employee Benefit Plans, Form 5310-A, Notice of Plan Merger or Consolidation, Spinoff, or Transfer of Plan Assets or Liabilities; Notice of Qualified Separate Lines of Business, and Form 8955-SSA, Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits. See www.irs.gov for more information.

Plans covered by PBGC have special additional requirements, including premiums and reporting certain transactions directly with that agency. See PBGC's website (www.pbgc.gov/practitioners/) for information on premium payments and reporting and disclosure.

Each Form 5500 must accurately reflect the characteristics and operations that applied during the reporting year of the plan or arrangement. The requirements for completing the Form 5500 vary by the type of plan or arrangement. The section *What To File* summarizes what information must be reported for different types of plans and arrangements. The *Quick Reference Chart of Form 5500, Schedules and Attachments*, gives a brief guide to the annual return/report requirements of the 2025 Form 5500. See also the *"Troubleshooters Guide to Filing the ERISA Annual Reports"* available on www.dol.gov/ebsa, which is intended to help filers comply with the Form 5500 and Form 5500-SF annual reporting requirements and avoid common reporting errors.

The Form 5500 must be filed electronically as noted above. See Section 3 – Electronic Filing Requirement and the EFAST2 website at www.efast.dol.gov. Your Form 5500 entries will be initially screened electronically. Your entries must satisfy this screening for your filing to be received. Once received, your form may be subject to further detailed review, and your filing may be rejected based upon this further review.

ERISA and the Code provide for the assessment or imposition of penalties for not submitting the required information when due. See **Penalties**.

Annual reports filed under Title I of ERISA must be made available by plan administrators to plan participants and beneficiaries and by the DOL to the public under ERISA sections 104 and 106. Under section 504 of the Pension Protection Act of 2006 (PPA) Pub. L. 109-280, this availability for defined benefit pension plans must include the posting of identification and basic plan information and actuarial information (Form 5500, Schedule SB or MB, and all of the Schedule SB or MB attachments) on any plan sponsor intranet website (or website maintained by the plan administrator on behalf of the plan sponsor) that is used for the purpose of communicating with employees and not the public. Section 504 also requires DOL to display such information on DOL's website within 90 days after the filing of the plan's annual return/report. To see plan year 2009 and later Forms 5500, including actuarial information, see www.dol.gov/ebsa. See www.dol.gov/agencies/ebsa/workers-and-families/preparing-for-retirement/pension-plan-actuarial-information-search-instructions for 2008 and short plan year 2009 actuarial information filed under the previous paper-based system.

Changes to Note

Plan Characteristic Codes. New multiemployer plan characteristic codes, 1J, 1K, and 1L, have been added to the Defined Benefit Pension Features section of Form 5500, Part II, line 8a to identify multiemployer defined benefit plans that during the plan year or in a prior plan year, terminated as a result of mass withdrawal or plan amendment or became insolvent respectively. A new plan characteristic code, 1G, has been added to identify defined benefit plans that use a variable annuity benefit formula. Plan characteristic code 1H (plan covered by PBGC that was terminated and closed out for PBGC purposes) has been modified to clarify that it applies only to terminated single-employer PBGC-covered plans.

Administrative Penalties. The instructions have been updated to reflect an increase in the maximum civil penalty amount assessable under ERISA section 502(c)(2), as required by the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015.

Table of Contents	Page
Section 1: Who Must File	2
Pension Benefit Plan	2
Welfare Benefit Plan	3
Direct Filing Entity (DFE)	4
Section 2: When To File	4
Extension of Time To File	4
Section 3: Electronic Filing Requirement	5
Amended Return/Report	6
Final Return/Report	6
Signature and Date	6
Change in Plan Year	7
Penalties	7
Administrative Penalties	7
Other Penalties	7
Section 4: What To File	7
Form 5500 Schedules	8
Pension Schedules	8
General Schedules	8
Pension Benefit Plan Filing Requirements	9
Limited Pension Plan Reporting	9
Welfare Benefit Plan Filing Requirements	10
Direct Filing Entity (DFE) Filing Requirements	10
Master Trust Investment Account (MTIA)	10
Common/Collective Trust (CCT) and Pooled Separate Account (PSA)	11
103-12 Investment Entity (103-12 IE)	11
Defined Contribution Group Reporting Arrangements (DCGs or DCG Reporting Arrangements)	12
Quick Reference Chart of Form 5500, Schedules, and Attachments	13
Section 5: Line-by-Line Instructions for the 2025 Form 5500 and Schedules	15
Part I (Form 5500) – Annual Return/Report Identification Information	15
Part II (Form 5500) – Basic Plan Information	17
M-1 Compliance Information	20
Schedule A – Insurance Information	23
Schedule C – Service Provider Information	26
Schedule D – DFE/Participating Plan Information	31
Schedule DCG – Individual Plan Information	33
Schedule G – Financial Transaction Schedules	41
Schedule H – Financial Information	43
Schedule I – Financial Information – Small Plan	55
Schedule MB – Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information	63
Schedule MEP – Multiple-Employer Retirement Plan Information	71
Schedule R – Retirement Plan Information	73
Schedule SB – Single-Employer Defined Benefit Plan Actuarial Information	79
Paperwork Reduction Act Notice	94
Codes for Principal Business Activity	95
ERISA Compliance Quick Checklist	98
Index	99

How To Get Assistance

If you need help completing this form or have related questions, call the EFAST2 Help Desk at 1-866-GO-EFAST (1-866-463-3278) (toll-free) or access the EFAST2 or IRS websites. The EFAST2 Help Desk is available Monday through Friday from 8:00 am to 8:00 pm, Eastern Time.

You can access the EFAST2 website 24 hours a day, 7 days a week at www.efast.dol.gov to:

- File the Form 5500-SF or 5500, and any needed schedules or attachments.
- Check on the status of a filing you submitted.
- View filings posted by EFAST2.
- Register for electronic credentials to sign or submit filings.
- View forms and related instructions.
- Get information regarding EFAST2, including approved software vendors.
- See answers to frequently asked questions about the Form 5500-SF, the Form 5500 and its schedules, and EFAST2.
- Access the main Employee Benefit Security Administration (EBSA) and DOL websites for news, regulations, and publications.

You can access the IRS website 24 hours a day, 7 days a week at www.irs.gov to:

- View forms, instructions, and publications.
- See answers to frequently asked tax questions.
- Search publications online by topic or keyword.
- Send comments or request help by email.
- Sign up to receive local and national tax news by email.

You can order other IRS forms and publications at www.irs.gov/orderforms. You can order EBSA publications by calling **1-866-444-EBSA** (3272).

Section 1: Who Must File

A return/report must be filed every year for every pension benefit plan, welfare benefit plan, and for every entity that files as a DFE as specified below (under Code section 6058(a) and ERISA sections 104 and 4065).

If you are a small plan (generally under 100 participants at the beginning of the plan year), you may be eligible to file the Form 5500-SF instead of the Form 5500. For more information, see the instructions to the Form 5500-SF.

Pension Benefit Plan

All pension benefit plans covered by ERISA must file an annual return/report except as provided in this section. 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.

The following are among the pension benefit plans for which a return/report must be filed.

1. Profit-sharing plans, stock bonus plans, money purchase plans, 401(k) plans, etc.
2. Annuity arrangements under Code section 403(b)(1) and custodial accounts established under Code section 403(b)(7) for regulated investment company stock. For more information regarding filing requirements for 403(b) plans subject to Title I of ERISA, see Field Assistance Bulletins 2009-02 and 2010-01.
3. Individual retirement accounts (IRAs) established by an employer under Code section 408(c).
4. Church pension plans electing coverage under Code section 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 ERISA section 1022(i)(2) apply.
6. Plans that satisfy the Actual Deferral Percentage requirements of Code section 401(k)(3)(A)(ii) by adopting the “SIMPLE” provisions of Code section 401(k)(11).

See *What To File* for more information about what must be completed for pension plans.

Do Not File a Form 5500 for a Pension Benefit Plan That Is Any of the Following:

1. An unfunded excess benefit plan. See ERISA section 4(b)(5).
2. An annuity or custodial account arrangement under Code sections 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 section 408(p).
4. A simplified employee pension (SEP) or a salary reduction SEP described in Code section 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**, Annual Return of A One-Participant (Owners/Partners and Their Spouses) Retirement Plan or A Foreign Plan. For more information on filing Form 5500-EZ for a foreign plan, including directions that specify when a filer must file Form 5500-EZ electronically with EFAST2 and when they may file on paper, see the Instructions for Form 5500-EZ, or go to www.irs.gov.
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.
11. A "one-participant plan." For this purpose, a "one-participant plan" is defined as:

- a. a pension benefit plan that covers only an individual or an individual and their spouse who wholly own a trade or business, whether incorporated or unincorporated; or
- b. a pension benefit plan for a partnership that covers only the partners or the partners and the partners' spouses (treating 2% shareholder of an S corporation, as defined in Code section 1372(b), as a partner).

However, certain one-participant plans are required to file the **Form 5500-EZ**, Annual Return of A One-Participant (Owners/Partners and Their Spouses) Retirement Plan or A Foreign Plan. For more information on filing Form 5500-EZ for such a "one-participant plan", including directions that specify when a filer must file Form 5500-EZ electronically with EFAST2 and when they may file on paper, see the Instructions for Form 5500-EZ, or go to www.irs.gov/ep.

See the instructions to the Form 5500-EZ for eligibility conditions and filing requirements. For more information, go to www.irs.gov/ep.

Welfare Benefit Plan

All welfare benefit plans covered by ERISA are required to file a Form 5500 except as provided in this section. Welfare benefit plans provide benefits such as medical, dental, life insurance, apprenticeship and training, scholarship funds, severance pay, disability, etc. See *What To File* for more information.

Reminder: The administrator of an employee welfare benefit plan that provides benefits wholly or partially through a Multiple-Employer Welfare Arrangement (MEWA) as defined in

ERISA section 3(40) must file a Form 5500, unless otherwise exempt. Plans required to file a Form M-1, *Report for Multiple-Employer Welfare Arrangements (MEWAs) and Certain Entities Claiming Exception (ECEs)*, are not eligible for the filing exemption in 29 CFR 2520.104-20 described below. Such plans are required to file the Form 5500 regardless of the plan size or type of funding.

Do Not File a Form 5500 for a Welfare Benefit Plan That Is Any of the Following:

1. A welfare benefit plan that covered fewer than 100 participants as of the beginning of the plan year and is unfunded, fully insured, or a combination of insured and unfunded, and which is not subject to the Form M-1 requirements under 29 CFR 2520.101-2, as specified in 29 CFR 2520.104-20.

Note. To determine whether the plan covers fewer than 100 participants for purposes of these filing exemptions for insured and unfunded welfare plans, see instructions for lines 5 and 6 on counting participants in a welfare plan. See also 29 CFR 2510.3-3(d).

- a. An *unfunded welfare benefit plan* has its benefits paid as needed directly from the general assets of the employer or employee organization that sponsors the plan.

Note. Plans that are NOT unfunded include those plans that received employee (or former employee) contributions during the plan year and/or used a trust or separately maintained fund (including a Code section 501(c)(9) trust) to hold plan assets or act as a conduit for the transfer of plan assets during the year. A welfare benefit plan with employee contributions that is associated with a cafeteria plan under Code section 125 may be treated for annual reporting purposes as an unfunded welfare plan if it meets the requirements of DOL Technical Release 92-01, 57 Fed. Reg. 23272 (June 2, 1992) and 58 Fed. Reg. 45359 (Aug. 27, 1993). The mere receipt of COBRA contributions or other after-tax participant contributions (e.g., retiree contributions) by a cafeteria plan would not by itself affect the availability of the relief provided for cafeteria plans that otherwise meet the requirements of DOL Technical Release 92-01. See 61 Fed. Reg. 41220, 41222-23 (Aug. 7, 1996).

- b. A *fully insured welfare benefit plan* has its benefits provided exclusively through insurance contracts or policies, the premiums of which must be paid directly to the insurance carrier by the employer or employee organization from its general assets or partly from its general assets and partly from contributions by its employees or members (which the employer or employee organization forwards within three (3) months of receipt). The insurance contracts or policies discussed above must be issued by an insurance company or similar organization (such as Blue Cross Blue Shield or a health maintenance organization) that is qualified to do business in any state.

- c. A *combination unfunded/insured welfare benefit plan* has its benefits provided partially as an unfunded plan and partially as a fully insured plan. An example of such a plan is a welfare benefit plan that provides medical benefits as in **a** above and life insurance benefits as in **b** above. See 29 CFR 2520.104-20.

2. A welfare benefit plan maintained outside the United States primarily for persons substantially all of whom are nonresident aliens.

3. A governmental plan.

4. An unfunded or insured welfare benefit plan maintained for a select group of management or highly compensated employees, which meets the requirements of 29 CFR 2520.104-24.

5. An employee benefit plan maintained only to comply with workers' compensation, unemployment compensation, or disability insurance laws.

6. A welfare benefit plan that participates in a group insurance arrangement that files a Form 5500 on behalf of the welfare benefit plan as specified in 29 CFR 2520.103-2. See 29 CFR 2520.104-43.

7. An apprenticeship or training plan meeting all of the conditions specified in 29 CFR 2520.104-22.

8. An unfunded dues financed welfare benefit plan exempted by 29 CFR 2520.104-26.

9. A church plan under ERISA section 3(33).

10. A welfare benefit plan maintained solely for (1) an individual or an individual and their spouse, who wholly own a trade or business, whether incorporated or unincorporated, or (2) partners or the partners and the partners' spouses in a partnership. See 29 CFR 2510.3-3(b).

Direct Filing Entity (DFE)

Some plans participate in certain trusts, accounts, and other investment or reporting arrangements that file the Form 5500 Annual Return/Report as a DFE in accordance with the *Direct Filing Entity (DFE) Filing Requirements*. A Form 5500 must be filed for a master trust investment account (MTIA). A Form 5500 is not required but may be filed for a common/collective trust (CCT), pooled separate account (PSA), 103-12 investment entity (103-12 IE), defined contribution group reporting arrangement (DCG or DCG reporting arrangement), or group insurance arrangement (GIA). Plans that participate in CCTs, PSAs, 103-12 IEs, DCGs, or GIAs that file as DFEs, however, generally are eligible for certain annual reporting relief. For reporting purposes, a CCT, PSA, 103-12 IE, DCG, or GIA is not considered a DFE unless a Form 5500 and all required attachments are filed for it in accordance with the *Direct Filing Entity (DFE) Filing Requirements*.

Note. Special requirements also apply to Schedules D and H attached to the Form 5500 filed by plans participating in MTIAs, CCTs, PSAs, DCGs, and 103-12 IEs. See these schedules and their instructions.

Section 2: When To File

Plans, DCGs and GIAs. File 2025 returns/reports for plan, DCG and GIA years that began in 2025. All required forms, schedules, statements, and attachments must be filed by the last day of the 7th calendar month after the end of the plan, DCG or GIA year (not to exceed 12 months in length) that began in 2025. If the plan, DCG or GIA year differs from the 2025 calendar year, fill in the fiscal year beginning and ending dates in the space provided.

DFEs other than DCGs and GIAs. File 2025 returns/reports no later than 9½ months after the end of the DFE year that ended in 2025. A Form 5500 filed for a DFE (other than DCGs and GIAs) must report information for the DFE year (not to exceed 12 months in length). If the DFE year differs from the 2025 calendar year, fill in the fiscal year beginning and ending dates in the space provided.

Short Years. For a plan year of less than 12 months (short plan year), file the form and applicable schedules by the last day of the 7th 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 box 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.

Notes. (1) 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. **(2)** If the 2026 Form 5500 is not available before the plan or DFE filing is due, use the 2025 Form 5500 and enter the 2026 fiscal year beginning and ending dates on the line provided at the top of the form.

Extension of Time To File Using Form 5558

A plan, GIA, or DCG may obtain a one-time extension of time to file a Form 5500 Annual Return/Report (up to 2½ months) by filing IRS Form 5558, Application for Extension of Time To File Certain Employee Plan Returns, on or before the normal due date (not including any extensions) of the return/report. A copy of the completed extension request must be retained with the filer's records. Please see **Instructions for Form 5558** for more information on how and where to file.

Note. The plan administrator of a DCG reporting arrangement can file a single Form 5558 for an extension of time to file a Form 5500 Annual Return/Report. The individual plans participating in a DCG reporting arrangement are covered by the single Form 5558 submitted by the DCG. The plan administrator is not required to attach a list of participating plans in the DCG to the Form 5558.

Using Extension of Time To File Federal Income Tax Return

An automatic extension of time to file the Form 5500 Annual Return/Report until the due date of the federal income tax return of the employer will be granted if all of 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, nor can it be extended beyond a total of 9½ months beyond the close of the plan year.

Note. A tax-exempt organization is not required to file a federal income tax return. However, if the organization uses a Form 8868 to request an extension for its Form 990 series return, the filer is automatically granted an extension of time to file the Form 5500 until the extended due date of filing Form 990 series if all conditions listed above are met. An extension granted by using this automatic extension procedure cannot be extended beyond a total of 9½ months beyond the close of the plan year.

Note. An extension of time to file the Form 5500 does not operate as an extension of time to file a Form 5500 filed for a DFE (other than a DCG or GIA), to file PBGC premiums or annual financial and actuarial reports (if required by ERISA section 4010) or to file the Form 8955-SSA (Annual Registration Statement Identifying Separated Participants with Deferred Vested Benefits) (required to be filed with the IRS under Code section 6057(a)).

Other Extensions of Time

The IRS, DOL, and PBGC may announce special extensions of time under certain circumstances, such as extensions for Presidentially-declared disasters or for service in, or in support of, the Armed Forces of the United States in a combat zone. See www.irs.gov, www.efast.dol.gov, and www.pbpc.gov/practitioners for announcements regarding such special extensions. If you are relying on one of these

announced special extensions, check the appropriate box on Form 5500, Part I, line D, and enter a description of the announced authority for the extension.

Delinquent Filer Voluntary Compliance (DFVC) Program

The DFVC Program facilitates voluntary compliance by plan administrators who are delinquent in filing annual reports under Title I of ERISA by permitting administrators to pay reduced civil penalties for voluntarily complying with their DOL annual reporting obligations. If the Form 5500 is being filed under the DFVC Program, check the appropriate box in Form 5500, Part I, line D, to indicate that the Form 5500 is being filed under the DFVC Program. See www.efast.dol.gov for additional information.

Plan administrators are reminded that they can use the online calculator available at www.askebsa.dol.gov/dfvcepay/calculator to compute the penalties due under the program. Payments under the DFVC Program also may be submitted electronically. For information on how to pay DFVC Program payments online, go to www.dol.gov/ebbsa.



Filers who wish to participate in the DFVC Program for plan years prior to 2023 must use the 2025 version of Form 5500 or, if applicable, Form 5500-SF. Use the Form 5500 Version Selection Tool available at www.efast.dol.gov for further information.

Section 3: Electronic Filing Requirement

Your 2025 Form 5500 must be electronically filed in the ERISA Filing Acceptance System (EFAST2). You may file online using EFAST2's web-based filing system or you may file through an EFAST2-approved vendor. Detailed information on electronic filing is available at www.efast.dol.gov. For telephone assistance, call the EFAST2 Help Desk at 1-866-GO-EFAST (1-866-463-3278). The EFAST2 Help Desk is available Monday through Friday from 8:00 am to 8:00 pm, Eastern Time.



Annual returns/reports filed under Title I of ERISA must be made available by plan administrators to plan participants and beneficiaries and by the DOL to the public under ERISA sections 104 and 106. Even though the Form 5500 must be filed electronically, the administrator must keep a copy of the Form 5500, including schedules and attachments, with all required signatures on file as part of the plan's records and must make a paper copy available upon request to participants, beneficiaries, and the DOL as required by ERISA section 104 and 29 CFR 2520.103-1. Filers may use electronic media for record maintenance and retention, so long as they meet the applicable requirements. (See 29 CFR 2520.107-1).

Note. Effective for plan years beginning after 2019, a one-participant plan or a foreign plan can file Form 5500-EZ electronically using the EFAST2 filing system. Information filed on Form 5500-EZ using EFAST2 is required to be made available to the public. However, information filed with EFAST2 using Form 5500-EZ will not be published on the internet.

Generally, questions on the Form 5500 relate to the plan year entered at the top of the first page of the form. Therefore, answer all questions on the 2025 Form 5500 with respect to the 2025 plan year unless otherwise explicitly stated in the instructions or on the form itself.

Your entries must be in the proper format in order for the EFAST2 system to process your filing. For example, if a question requires you to enter a dollar amount, you cannot enter a word. Your software will not let you submit your return/

report unless all entries are in the proper format. To reduce the possibility of correspondence and penalties:

- Complete all lines on the Form 5500 unless otherwise specified. Also complete and electronically attach, as required, applicable schedules and attachments.
- Do not enter "N/A" or "Not Applicable" on the Form 5500 unless specifically permitted. "Yes" or "No" questions on the forms and schedules cannot be left blank, unless specifically permitted. Answer either "Yes" or "No," but not both.

All schedules and attachments to the Form 5500 must be properly identified, and must include the name of the plan or DFE, EIN, and plan number (PN) as found on the Form 5500, lines, 1a, 2b, and 1b, respectively. At the top of each attachment, indicate the schedule and line, if any (e.g., Schedule H, line 4i) to which the attachment relates.

Check your return/report for errors before signing or submitting it to EFAST2. Your filing software or, if you are using it, the EFAST2 web-based filing system will allow you to check your return/report for errors. If, after reasonable attempts to correct your filing to eliminate any identified problem or problems, you are unable to address them, or you believe that you are receiving the message in error, call the EFAST2 Help Desk at 1-866-GO-EFAST (1-866-463-3278) or contact the service provider you used to help prepare and file your annual return/report.

Once you complete the return/report and finish the electronic signature process, you can electronically submit it to EFAST2. When you electronically submit your return/report, EFAST2 is designed to immediately notify you if your submission was received and whether the return/report is ready to be processed by EFAST2. If EFAST2 does not notify you that your submission was successfully received and is ready to be processed, you will need to take steps to correct the problem or you may be deemed a non-filer subject to penalties from DOL, IRS, and/or PBGC.

Once EFAST2 receives your return/report, the EFAST2 system should be able to provide a filing status within 20 minutes. The person submitting the filing should check back into the EFAST2 system to determine the filing status of your return/report. The filing status message will include a list of any filing errors or warnings that EFAST2 may have identified in your filing. If EFAST2 did not identify any filing errors or warnings, EFAST2 will show the filing status of your return/report as "Filing Received." Persons other than the submitter can check whether the filing was received by the system by calling the EFAST2 Help Desk at 1-866-GO-EFAST (1-866-463-3278) and using the automated telephone system.

To reduce the possibility of correspondence and penalties from the DOL, IRS, and/or PBGC, you should do the following: (1) Before submitting your return/report to EFAST2, check it for errors, and (2) after you have submitted it to EFAST2, verify that you have received a filing status of "Filing Received" and attempt to correct and resolve any errors or warnings listed in the status report.

Note. Even after being received by the EFAST2 system, your return/report filing may be subject to further detailed review by DOL, IRS, and/or PBGC, and your filing may be deemed deficient based upon this further review. See Penalties on Page 7.



Do not enter social security numbers in response to questions asking for an employer identification number (EIN). Because of privacy concerns, the inclusion of a social security number or any portion thereof on the Form 5500 or on a schedule or attachment that is open to public inspection may result in the rejection of the filing. If you discover a filing disclosed on the EFAST2 website that contains a social

security number, immediately call the EFAST2 Help Desk at 1-866-GO-EFAST (1-866-463-3278).

Employers without an EIN must apply for one as soon as possible. The EBSA does not issue EINs. To apply for an EIN from the IRS:

- Mail or fax Form SS-4, Application for Employer Identification Number, obtained at www.irs.gov/orderforms.
- See www.IRS.gov/Businesses and click on "Employer ID Numbers" for additional information. The EIN is issued immediately once the application information is validated. (The online application process is not yet available for corporations with addresses in foreign countries or Puerto Rico.)



Do not attach a copy of the annual registration statement (IRS Form 8955-SSA) identifying separated participants with deferred vested benefits, or a previous year's Schedule SSA (Form 5500) to your 2025 Form 5500 Annual Return/Report. The annual registration statement must be filed directly with the IRS and cannot be attached to a Form 5500 submission with EFAST2.

Amended Return/Report

File an amended return/report to correct errors and/or omissions in a previously filed annual return/report for the 2025 plan year. The amended Form 5500 and any amended schedules and/or attachments must conform to the requirements in these instructions. See the DOL website at www.efast.dol.gov for information on filing amended returns/reports for prior years.

Note. An amended filing must be submitted as a complete replacement of the previously submitted filing. You will need to resubmit the entire form, with all required schedules and attachments, through EFAST2. You cannot submit just the parts of the filing that are being amended. See EFAST2 FAQs available on the EFAST website at www.efast.dol.gov.

If a plan participating in a DCG amended its Schedule DCG to correct errors and/or omissions in a previously filed Schedule DCG, the DCG must resubmit an amended filing as described above, with all required schedules and attachments, including Schedules DCG for all participating plans that were submitted with the original return. The line F box for "an amended Schedule DCG" on the Schedule DCG must be checked only for those Schedules DCG that have been changed from the original submission.



Check the line B box for "an amended return/report" if you filed a previous 2025 annual return/report that was given a "Filing_Received," "Filing_Error," or "Filing_Stopped" status by EFAST2. Do not check the line B box for "an amended return/report" if your previous submission attempts were not successfully received by EFAST2 because of problems with the transmission of your return/report. For more information, go to the EFAST2 website at www.efast.dol.gov or call the EFAST2 Help Desk at 1-866-GO-EFAST (1-866-463-3278).

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, and when all liabilities for which benefits may be paid under a welfare benefit plan have been satisfied, check the final return/report box in Part I, line B at the top of the Form 5500. Do not mark the final return/report box if you are reporting participants and/or assets at the end of the plan year. If a trustee is appointed for a terminated defined benefit plan under ERISA section 4042, the last plan year for which a return/report must be filed is the year in which the trustee is appointed. If you are in this situation you may contact PBGCTrusteedPlan@dol.gov for further information.

Examples:

Mergers/Consolidations

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.

Pension and Welfare Plans That Terminated Without Distributing All Assets

If the plan was terminated, but all plan assets were not distributed, a return/report must be filed for each year the plan has assets. The return/report must be filed by the plan administrator, if designated, or by the person or persons who actually control the plan's assets/property.

Welfare Plans Still Liable To Pay Benefits

A welfare plan cannot file a final return/report if the plan is still liable to pay benefits for claims that were incurred prior to the termination date, but not yet paid. See 29 CFR 2520.104b-2(g)(2)(ii).

Signature and Date

For purposes of Title I of ERISA, the plan administrator is required to file the Form 5500. If the plan administrator does not sign a filing, the filing status will indicate that there is an error with your filing, and your filing will be subject to further review, correspondence, rejection, and civil penalties.

The plan administrator must electronically sign the Form 5500 or 5500-SF submitted to EFAST2.



After submitting your filing, you must check the Filing Status. If the filing status is "Processing Stopped" or "Unprocessable", it is possible your submission was not sent with a valid electronic signature as required, and depending on the error, may be considered not to have been filed. By looking closer at the Filing Status, you can see specific error messages applicable to the transmitted filing and determine whether it was sent with a valid electronic signature and what other errors may need to be corrected.

Note. If the plan administrator is an entity, the electronic signature must be in the name of a person authorized to sign on behalf of the plan administrator.

Authorized Service Provider Signatures. A statement for service providers that use this electronic signature option is in the IFILE application. The statement provides that, by signing the electronic filing, the service provider is attesting: (1) that the service provider has been authorized in writing by the plan administrator, plan sponsor/employer, or DFE, as applicable, to electronically submit the return/report; (2) that a copy of the specific written authorization will be kept in the service provider's records; (3) that, in addition to any other required schedules or attachments, the electronic filing includes a true and correct PDF copy of the completed Form 5500 (without schedules or attachments) bearing the manual signature of the plan administrator, employer/plan sponsor, or DFE, as applicable, under penalty of perjury; (4) that the service provider advised the plan administrator, employer/plan sponsor, or DFE, as applicable, that by selecting this electronic signature option, the image of the plan administrator's, employer/plan sponsor's, or DFE's manual signature will be included with the rest of the return/report posted by the Department of Labor on the Internet for public disclosure; and (5) that the service provider will communicate to the plan administrator, employer/plan sponsor, or DFE, as applicable, any inquiries and information received from EFAST2, DOL, IRS or PBGC regarding the return/report.

Note. The Code permits either the plan sponsor/employer or the administrator to sign the filing. However, any Form 5500 that is not electronically signed by the plan administrator will be

subject to rejection and civil penalties under Title I of ERISA.

For DFE filings, a person authorized to sign on behalf of the DFE must sign for the DFE.

The Form 5500 Annual Return/Report must be filed electronically and signed. To obtain an electronic signature, go to www.efast.dol.gov and register in EFAST2 as a signer. You will be provided with a UserID and PIN. Both the UserID and PIN are needed to sign the Form 5500. The plan administrator must keep a copy of the Form 5500, including schedules and attachments with all required signatures on file as part of the plan's records. See 29 CFR 2520.103-1.

Electronic signatures on annual returns/reports filed under EFAST2 are governed by the applicable statutory and regulatory requirements.

Change in Plan Year

Generally, only defined benefit pension plans need to get approval for a change in the plan year. See Code section 412(d)(1). However, under Revenue Procedure 87-27, 1987-1 C.B. 769, these pension plans may be eligible for automatic approval of a change in plan year.

If a change in plan year for a pension or welfare benefit plan creates a short plan year, file the form and applicable schedules by the last day of the 7th 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 in Part I and check the appropriate box 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 the *Final Return/Report* to determine if "final return/report" in line B should be checked.

Penalties

Plan administrators and plan sponsors must provide complete and accurate information and must otherwise comply fully with the filing requirements. ERISA and the Code provide for the DOL and the IRS, respectively, to assess or impose penalties for not giving complete and accurate information and for not filing complete and accurate statements and returns/reports. Certain penalties are administrative (i.e., they may be imposed or assessed by one of the governmental agencies delegated to administer the collection of the annual return/report data). Others require a legal conviction.

Administrative Penalties

Listed below are various penalties under ERISA and the Code that may be assessed or imposed for not meeting the annual return/report filing requirements. Generally, whether the penalty is under ERISA or the Code, or both, depends upon the agency for which the information is required to be filed. One or more of the following administrative penalties may be assessed or imposed in the event of incomplete filings or filings received after the due date unless it is determined that your failure to file properly is for reasonable cause:

1. A penalty of up to \$2,739 a day for each day a plan administrator fails or refuses to file a complete and accurate report. See ERISA section 502(c)(2), 29 CFR 2560.502c-2, and the Federal Civil Penalties Inflation Adjustment Act of 1990, as amended by the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015 (2015 Inflation Adjustment Act). Pub. L. No. 114-74; 129 Stat. 599 and the DOL's implementing regulation at 90 Fed. Reg. 1854 (Jan. 10, 2025). The 2015 Inflation Adjustment Act requires agencies to adjust the levels of civil monetary penalties with an initial catch-up adjustment, followed by annual adjustments for inflation. Because the Federal Civil Penalties Inflation

Adjustment Improvements Act of 2015 (Pub. L. No. 114-74; 129 Stat. 599), requires the penalty amount to be adjusted annually after the Form 5500 and its schedules, attachments, and instructions are published for filing, be sure to check DOL's website for any possible required inflation adjustments of the maximum penalty amount that may have been published in the Federal Register after the instructions have been posted.

2. A penalty of \$250 a day (up to \$150,000) for not filing returns for certain plans of deferred compensation, trusts and annuities, and bond purchase plans by the due date(s). See Code section 6652(e).

3. A penalty of \$1,000 for each failure to file an actuarial statement (Schedule MB (Form 5500) or Schedule SB (Form 5500)) required by the applicable instructions. See Code section 6692.

Other Penalties

1. Any individual who willfully violates any provision of Part 1 of Title I of ERISA shall on conviction be fined not more than \$100,000 or imprisoned not more than 10 years, or both. See ERISA section 501.

2. A penalty up to \$10,000, five (5) years imprisonment, or both, may be imposed for making any false statement or representation of fact, knowing it to be false, or for knowingly concealing or not disclosing any fact required by ERISA. See section 1027, Title 18, U.S. Code, as amended by ERISA section 111.

Section 4: What To File

The Form 5500 reporting requirements vary depending on whether the Form 5500 is being filed for a "large plan," a "small plan," and/or a DFE, and on the particular type of plan or DFE involved (e.g., welfare plan, pension plan, common/collective trust (CCT), pooled separate account (PSA), master trust investment account (MTIA), 103-12 IE, defined contribution group reporting arrangement (DCG or DCG reporting arrangement) or group insurance arrangement (GIA)).

The instructions below provide detailed information about each of the Form 5500 schedules and which plans and DFEs are required to file them.

The schedules are grouped in the instructions by type:

(1) Pension Benefit Schedules and **(2) General Schedules**. Each schedule is listed separately with a description of the subject matter covered by the schedule and the plans and DFEs that are required to file the schedule.

Filing requirements also are listed by type of filer:

(1) Pension Benefit Plan Filing Requirements; **(2) Welfare Benefit Plan Filing Requirements**; and **(3) DFE Filing Requirements** (including DCG reporting arrangements). For each filer type there is a separate list of the schedules that must be filed with the Form 5500 (including where applicable, separate lists for large plan filers, small plan filers, and different types of DFEs).

The filing requirements also are summarized in a "*Quick Reference Chart of Form 5500, Schedules, and Attachments*."

Generally, a return/report filed for a pension benefit plan or welfare benefit plan that covered fewer than 100 participants as of the beginning of the plan year should be completed following the requirements below for a "small plan," and a return/report filed for a plan that covered 100 or more participants as of the beginning of the plan year should be completed following the requirements below for a "large plan."

A plan other than a defined contribution pension plan uses the number of participants required to be entered in line 5 of the Form 5500 to determine whether a plan is a "small plan" or

“large plan.” A defined contribution pension plan uses the number required to be entered on line 6g(1), except that a defined contribution pension plan that checks the “first return/report” box on Part I, line B uses the number entered on line 6g(2).

Exceptions:

(1) 80-120 Participant Rule: *If the number of participants 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. Thus, if a Form 5500-SF or a Form 5500 Annual Return/Report was filed for the 2024 plan year as a small plan, including the Schedule I if applicable, and the participant count for the 2025 plan year is 120 or less, you may elect to complete the 2025 Form 5500 and schedules in accordance with the instructions for a small plan, including for eligible filers, filing the Form 5500-SF instead of the Form 5500.*

(2) Short Plan Year Rule: *If the plan had a short plan year of seven (7) months or less for either the prior plan year or the plan year being reported on the 2025 Form 5500, an election can be made to defer filing the accountant’s report in accordance with 29 CFR 2520.104-50. If such an election was made for the prior plan year, the 2025 Form 5500 must be completed following the requirements for a large plan, including the attachment of the Schedule H and the accountant’s reports, regardless of the number of participants.*

(3) DCG Reporting Arrangements: *Defined contribution pension plans included as participating plans in a DCG reporting arrangement each count participants at the individual plan level to determine whether the plan may be eligible for the waiver of the annual examination and report of an independent qualified public accountant (IQPA) for small plans on the Schedule DCG. For additional information, see the Schedule DCG instructions.*

Form 5500 Schedules

Pension Schedules

Schedule R (Retirement Plan Information) – is required for a pension benefit plan that is a defined benefit plan or is otherwise subject to Code section 412 or ERISA section 302. Schedule R may also be required for certain other pension benefit plans unless otherwise specified under *Limited Pension Plan Reporting*. For additional information, see the Schedule R instructions.

Schedule MB (Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information) – is required for most multiemployer defined benefit plans and for defined contribution pension plans that currently amortize a waiver of the minimum funding requirements specified in the instructions for the Schedule MB. For additional information, see the instructions for the Schedule MB and the Schedule R.

Schedule SB (Single-Employer Defined Benefit Plan Actuarial Information) – is required for most single-employer defined benefit plans, including multiple-employer defined benefit pension plans. For additional information, see the instructions for the Schedule SB.

Schedule MEP (Multiple-Employer Retirement Plan Information) – is required for multiple-employer pension plans. For additional information, see the instructions for the Schedule MEP.

Schedule DCG (Individual Plan Information) – is required for DCGs. Each plan participating in a DCG must individually complete a Schedule DCG. For additional information, see the instructions for the Schedule DCG.

General Schedules

Schedule H (Financial Information) – is required for pension benefit plans and welfare benefit plans filing as “large plans” and for all DFE filings. Employee benefit plans, 103-12 IEs, and GIAs filing the Schedule H are generally required to engage an independent qualified public accountant (IQPA) and attach a report of the IQPA under ERISA section 103(a)(3)(A). In the case of a DCG reporting arrangement, the IQPA requirements are determined at the participating plan level for each plan participating in the DCG. Plans and DFEs filing the Schedule H, including the DCG filer that reports financial information on an aggregated basis on behalf of all participating plans, are also generally required to attach to the Form 5500 a “**Schedule of Assets (Held At End of Year)**,” and, if applicable, a “**Schedule of Assets (Acquired and Disposed of Within Year)**,” a “**Schedule of Reportable Transactions**,” and a “**Schedule of Delinquent Participant Contributions**.” For additional information, see the Schedule H instructions.

Exceptions: Insured, unfunded, or combination unfunded/insured welfare plans, as described in 29 CFR 2520.104-44(b)(1) and certain pension plans and arrangements, as described in 29 CFR 2520.104-44(b)(2) and in *Limited Pension Plan Reporting*, are exempt from completing the Schedule H.

Schedule I (Financial Information - Small Plan) – is required for all pension benefit plans and welfare benefit plans filing the Form 5500 Annual Return/Report, rather than the Form 5500-SF, as “small plans.” Regardless of size, all DFEs (including DCGs) and certain pension benefit plans and arrangements described in 29 CFR 2520.104-44(b)(2) and in *Limited Pension Plan Reporting*, file Schedule H not Schedule I. For additional information, see the Schedule I and Schedule H instructions.

Note. A welfare plan that would have been eligible for the filing exemption under 29 CFR 2520.104-20, but for the fact that it is required to file a Form M-1, is exempt from completing a Schedule I if it meets the requirements of 29 CFR 2520.104-44(b)(1).

Schedule A (Insurance Information) – is required if any benefits under an employee benefit plan are provided by an insurance company, insurance service or other similar organization (such as Blue Cross Blue Shield, or a health maintenance organization). This includes investment contracts with insurance companies, such as guaranteed investment contracts and pooled separate accounts. For additional information, see the Schedule A instructions.

Note. Do not file Schedule A for Administrative Services Only (ASO) contracts. Do not file Schedule A if a Schedule A is filed for the contract as part of the Form 5500 filed directly by a master trust investment account (MTIA) or 103-12 IE.

Schedule C (Service Provider Information) – is required for a large plan, MTIA, 103-12 IE, DCG or GIA if **(1)** any service provider who rendered services to the plan or DFE during the plan or DFE year received \$5,000 or more in compensation, directly or indirectly from the plan or DFE, or **(2)** an accountant and/or enrolled actuary has been terminated. For additional information, see the Schedule C instructions.

Schedule D (DFE/Participating Plan Information) – Part I is required for a plan or DFE that invested or participated in any MTIAs, 103-12 IEs, CCTs, and/or PSAs. Part II is required when the Form 5500 is filed for a DFE, except DCGs. For additional information, see the Schedule D instructions.

Schedule G (Financial Transaction Schedules) – is required for a large plan, MTIA, 103-12 IE, DCG or GIA when Schedule H (Financial Information) lines 4b, 4c, and/or 4d are checked

“Yes.” Part I of the Schedule G reports loans or fixed income obligations in default or classified as uncollectible. Part II of the Schedule G reports leases in default or classified as uncollectible. Part III of the Schedule G reports nonexempt transactions. For additional information, see the Schedule G instructions.



An unfunded, fully insured, or combination unfunded/insured welfare plan with 100 or more participants exempt under 29 CFR 2520.104-44 from completing Schedule H must still complete Schedule G, Part III, to report nonexempt transactions.

Pension Benefit Plan Filing Requirements

Pension benefit plan filers must complete the Form 5500 Annual Return/Report, including the signature block and, unless otherwise specified, attach the following schedules and information:

Small Pension Plan

The following schedules (including any additional information required by the instructions to the schedules) must be attached to a Form 5500 filed for a small pension plan that is neither exempt from filing nor is filing the Form 5500-SF:

1. Schedule A (as many as needed), to report insurance, annuity, and investment contracts held by the plan.
2. Schedule D, Part I, to list any CCTs, PSAs, MTIAs, and 103-12 IEs in which the plan participated at any time during the plan year.
3. Schedule I, to report small plan financial information, unless exempt.
4. Schedule MB or SB, to report actuarial information, if applicable.
5. Schedule MEP, to report information about multiple-employer pension plans, if applicable.
6. Schedule R, to report retirement plan information, if applicable.



If Schedule I, line 4k, is checked “No,” you must attach the report of the independent qualified public accountant (IQPA) or a statement that the plan is eligible and elects to defer attaching the IQPA’s opinion under 29 CFR 2520.104-50 in connection with a short plan year of seven months or less.

Large Pension Plan

The following schedules (including any additional information required by the instructions to the schedules) must be attached to a Form 5500 filed for a large pension plan:

1. Schedule A (as many as needed), to report insurance, annuity, and investment contracts held by the plan.
2. Schedule C, if applicable, to report information on service providers and, if applicable, any terminated accountants or enrolled actuaries.
3. Schedule D, Part I, to list any CCTs, PSAs, MTIAs, and 103-12 IEs in which the plan invested at any time during the plan year.
4. Schedule G, 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, i.e., file Schedule G if Schedule H (Form 5500) lines 4b, 4c, and/or 4d are checked “Yes.”
5. Schedule H, to report large plan financial information, unless exempt.
6. Schedule MB or SB, to report actuarial information, if applicable.
7. Schedule MEP, to report information about multiple-employer pension plans, if applicable.
8. Schedule R, to report retirement plan information, if applicable.

Eligible Combined Plans

PPA section 903 established rules for a new type of pension plan, an “eligible combined plan,” effective for plan years beginning after December 31, 2009. See Code section 414(x) and ERISA section 210(e). An eligible combined plan consists of a defined benefit plan and a defined contribution plan that includes a qualified cash or deferred arrangement under Code section 401(k), with the assets of the two plans held in a single trust, but clearly identified and allocated between the plans. The eligible combined plan design is available only to employers that employed an average of at least two, but not more than 500 employees, on business days during the calendar year preceding the plan year as of which the eligible combined plan is established and that employs at least two employees on the first day of the plan year that the plan is established. Because an eligible combined plan includes both a defined benefit plan and a defined contribution plan, the Form 5500 filed for the plan must include all the information, schedules, and attachments that would be required for either a defined benefit plan (such as a Schedule SB) or a defined contribution plan.

Limited Pension Plan Reporting

The pension benefit plans or arrangements described below are eligible for limited annual reporting:

1. **IRA Plans:** A pension plan using individual retirement accounts or annuities (as described in Code section 408) as the sole funding vehicle for providing pension benefits need complete only Form 5500, Part I and Part II, lines 1 through 4, and 8 (enter pension feature code 2N), and file Schedule MEP, in the case of any plan that is a multiple-employer pension plan (including a pooled employer plan).

2. **Fully Insured Pension Plan:** A pension benefit plan providing benefits exclusively through an insurance contract or contracts that are fully guaranteed and that meet all of the conditions of 29 CFR 2520.104-44(b)(2) during the entire plan year must complete all the requirements listed under this *Pension Benefit Plan Filing Requirements* section, except that such a plan is exempt from attaching Schedule H, Schedule I, and an independent qualified public accountant’s opinion, and from the requirement to engage an IQPA.

A pension benefit plan that has insurance contracts of the type described in 29 CFR 2520.104-44 as well as other assets must complete all requirements for a pension benefit plan, except that the value of the plan’s allocated contracts (see below) should not be reported in Part I of Schedule H or I. All other assets should be reported on Schedule H or Schedule I, and any other required schedules. If Schedule H is filed, attach an accountant’s report in accordance with the Schedule H instructions.

Note. For purposes of the annual return/report and the alternative method of compliance set forth in 29 CFR 2520.104-44, a contract is considered to be “allocated” only if the insurance company or organization that issued the contract unconditionally guarantees, upon receipt of the required premium or consideration, to provide a retirement benefit of a specified amount. This amount must be provided to each participant without adjustment for fluctuations in the market value of the underlying assets of the company or organization, and each participant must have a legal right to such benefits, which is legally enforceable directly against the insurance company or organization. For example, deposit administration, immediate participation guarantee, and guaranteed investment contracts are NOT allocated contracts for Form 5500 Annual Return/Report purposes.

Welfare Benefit Plan Filing Requirements

Welfare benefit plan filers must complete the Form 5500 Annual Return/Report, including the signature block and, unless otherwise specified, attach the following schedules and information:

Small Welfare Plan

The following schedules (including any additional information required by the instructions to the schedules) must be attached to a Form 5500 filed for a small welfare plan that is neither exempt from filing nor filing the Form 5500-SF:

1. Schedule A (as many as needed), to report insurance contracts held by the plan.
2. Schedule D, Part I, to list any CCTs, PSAs, MTIAs, and 103-12 IEs in which the plan participated at any time during the plan year.
3. Schedule I, to report small plan financial information.



A welfare plan that covered fewer than 100 participants as of the beginning of the plan year and is required to file a Form M-1, Report for Multiple-Employer Welfare Arrangements (MEWAs) and Certain Entities Claiming Exception (ECEs), is exempt from attaching Schedule I if the plan meets the requirements of 29 CFR 2520.104-44. However, Schedule G, Part III, must be attached to the Form 5500 to report any nonexempt transactions.

Large Welfare Plan

The following schedules (including any additional information required by the instructions to the schedules) must be attached to a Form 5500 filed for a large welfare plan:

1. Schedule A (as many as needed), to report insurance and investment contracts held by the plan.
2. Schedule C, if applicable, to report information on service providers and any terminated accountants or actuaries.
3. Schedule D, Part I, to list any CCTs, PSAs, MTIAs, and 103-12 IEs in which the plan invested at any time during the plan year.
4. Schedule G, 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, i.e., file Schedule G if Schedule H (Form 5500) lines 4b, 4c, and/or 4d are checked "Yes" or if a large welfare plan that is not required to file a Schedule H has nonexempt transactions.
5. Schedule H, to report financial information, unless exempt.



Attach the report of the independent qualified public accountant (IQPA) identified on Schedule H, line 3a, unless line 3d(2) is checked.



Neither Schedule H nor an IQPA's opinion should be attached to a Form 5500 filed for an unfunded, fully insured or combination unfunded/insured welfare plan that covered 100 or more participants as of the beginning of the plan year that meets the requirements of 29 CFR 2520.104-44. However, Schedule G, Part III, must be attached to the Form 5500 to report any nonexempt transactions. A welfare benefit plan that uses a "voluntary employees' beneficiary association" (VEBA) under Code section 501(c)(9) is generally not exempt from the requirement of engaging an IQPA.

Direct Filing Entity (DFE) Filing Requirements

Some plans participate in certain trusts, accounts, and other investment or reporting arrangements that file the Form 5500 Annual Return/Report as a DFE. A Form 5500 must be filed for a master trust investment account (MTIA). A Form 5500 is not required but may be filed for a common/collective trust (CCT), pooled separate account (PSA), 103-12 investment entity (103-12 IE), defined contribution group reporting arrangement (DCG

or DCG reporting arrangement) or group insurance arrangement (GIA).

Plans that participate in CCTs, PSAs, 103-12 IEs, DCGs or GIAs that file as DFEs generally are eligible for certain annual reporting relief. For reporting purposes, a CCT, PSA, 103-12 IE, DCG or GIA is considered a DFE only when a Form 5500 and all required schedules and attachments are filed for it in accordance with the following instructions.

Only one Form 5500 should be filed for each DFE for all plans participating in the DFE; however, the Form 5500 filed for the DFE, including all required schedules and attachments, must report information for the DFE year (not to exceed 12 months in length) that ends with or within the participating plan's year.

Any Form 5500 filed for a DFE is an integral part of the annual report of each participating plan, and the plan administrator may be subject to penalties for failing to file a complete annual report unless both the DFE Form 5500 and the plan's Form 5500 are properly filed. The information required for a Form 5500 filed for a DFE varies according to the type of DFE. The following paragraphs provide specific guidance for the reporting requirements for each type of DFE.

Master Trust Investment Account (MTIA)

The administrator filing a Form 5500 for an employee benefit plan is required to file or have a designee file a Form 5500 for each MTIA in which the plan participated at any time during the plan year. For reporting purposes, a "master trust" is a trust for which a regulated financial institution (as defined below) 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.

"Common control" is determined on the basis of all relevant facts and circumstances (whether or not such employers are incorporated).

A "regulated financial institution" means a bank, trust company, or similar financial institution that is regulated, supervised, and subject to periodic examination by a state or federal agency. A securities brokerage firm is not a "similar financial institution" as used here. See DOL Advisory Opinion 93-21A (available at www.dol.gov/ebsa).

The assets of a master trust are considered for reporting purposes to be held in one or more "investment accounts." A "master trust investment account" 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.

Notes. (1) If an MTIA consists solely of one plan's asset(s) during the reporting period, the plan may report the asset(s) either as an investment account on an MTIA Form 5500, or as a plan asset(s) that is not part of the master trust (and therefore subject to all instructions concerning assets not held in a master trust) on the plan's Form 5500. (2) If a master trust holds assets attributable to participant or beneficiary directed transactions under an individual account plan and the assets are interests in registered investment companies, interests in contracts issued by an insurance company licensed to do business in any state, interests in common/collective trusts maintained by a bank, trust company or similar institution, or the assets have a current value that is readily determinable on

an established market, those assets may be treated as a single MTIA.



DCGs and multiple-employer pension plans that are pooled employer plans cannot participate in an MTIA.

The Form 5500 submitted for the MTIA must comply with the Form 5500 instructions for a *Large Pension Plan*, unless otherwise specified in the forms and instructions. The MTIA must file:

1. Form 5500, except lines C, D, 1c, 2d, and 5 through 9. Be certain to enter “M” in Part I, line A, as the DFE code.
2. Schedule A (as many as needed) to report insurance, annuity and investment contracts held by the MTIA.
3. Schedule C, if applicable, to report service provider information. Part III is not required for an MTIA.
4. Schedule D, to list CCTs, PSAs, and 103-12 IEs in which the MTIA invested at any time during the MTIA year and to list all plans that participated in the MTIA during its year.
5. Schedule G, to report loans or fixed income obligations in default or determined to be uncollectible as of the end of the MTIA year, all leases in default or classified as uncollectible, and nonexempt transactions.
6. Schedule H, except lines 1b(1), 1b(2), 1c(8), 1g, 1h, 1i, 2a, 2b(1)(E), 2e, 2f, 2g, 4a, 4e, 4f, 4g, 4h, 4k, 4l, 4m, 4n, and 5, to report financial information. An independent qualified public accountant’s (IQPA’s) opinion is not required for an MTIA.
7. Additional information required by the instructions to the above schedules, including, for example, the schedules of assets held for investment and the schedule of reportable transactions. For purposes of the schedule of reportable transactions, the 5% figure shall be determined by comparing the current value of the transaction at the transaction date with the current value of the investment account assets at the beginning of the applicable fiscal year of the MTIA. All attachments must be properly labeled.

Common/Collective Trust (CCT) and Pooled Separate Account (PSA)

A Form 5500 is not required to be filed for a CCT or PSA. However, the administrator of a large plan or DFE that participates in a CCT or PSA that files as specified below is entitled to reporting relief that is not available to plans or DFEs participating in a CCT or PSA for which a Form 5500 is not filed.

For reporting purposes, “common/collective trust” and “pooled separate account” are, respectively: **(1)** a trust maintained by a bank, trust company, or similar institution or **(2)** an account maintained by an insurance carrier, which is regulated, supervised, and subject to periodic examination by a state or federal agency in the case of a CCT, or by a state agency in the case of a PSA, 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 as that term is used in Code section 1563. See 29 CFR 2520.103-3, 103-4, 103-5, and 103-9.

Note. For reporting purposes, a separate account that is not considered to be holding plan assets under 29 CFR 2510.3-101(h)(1)(iii) does not constitute a pooled separate account.

The Form 5500 submitted for a CCT or PSA must comply with the Form 5500 instructions for a *Large Pension Plan*, unless otherwise specified in the forms and instructions.

The CCT or PSA must file:

1. Form 5500, except lines C, D, 1c, 2d, and 5 through 9. Enter “C” or “P,” as appropriate, in Part I, line A, as the DFE code.
2. Schedule D, to list all CCTs, PSAs, MTIAs, and

103-12 IEs in which the CCT or PSA invested at any time during the CCT or PSA year and to list in Part II all plans that participated in the CCT or PSA during its year.

3. Schedule H, except lines 1b(1), 1b(2), 1c(8), 1d, 1e, 1g, 1h, 1i, 2a, 2b(1)(E), 2e, 2f, and 2g, to report financial information. Part IV and an accountant’s (IQPA’s) opinion are not required for a CCT or PSA.



Different requirements apply to the Schedules D and H attached to the Form 5500 filed by plans and DFEs participating in CCTs and PSAs, depending upon whether a DFE Form 5500 has been filed for the CCT or PSA. See the instructions for these schedules.

103-12 Investment Entity (103-12 IE)

DOL Regulation 2520.103-12 provides an alternative method of reporting for plans that invest in an entity (other than an MTIA, CCT, or PSA), whose underlying assets include “plan assets” within the meaning of 29 CFR 2510.3-101 of two or more plans that are not members of a “related group” of employee benefit plans. Such an entity for which a Form 5500 is filed constitutes a “103-12 IE.” A Form 5500 is not required to be filed for such entities; however, filing a Form 5500 as a 103-12 IE provides certain reporting relief, including the limitation of the examination and report of the independent qualified public accountant (IQPA) provided by 29 CFR 2520.103-12(d), to participating plans and DFEs. For this reporting purpose, a “related group” of employee benefit plans consists of each group of two or more employee benefit plans **(1)** each of which receives 10% or more of its aggregate contributions from the same employer or from a member of the same controlled group of corporations (as determined under Code section 1563(a), without regard to Code section 1563(a)(4) thereof); or **(2)** each of which is either maintained by, or maintained under a collective-bargaining agreement negotiated by, the same employee organization or affiliated employee organizations. For purposes of this paragraph, an “affiliate” of an employee organization means any person controlling, controlled by, or under common control with such organization. See 29 CFR 2520.103-12.

The Form 5500 submitted for a 103-12 IE must comply with the Form 5500 instructions for a *Large Pension Plan*, unless otherwise specified in the forms and instructions. The 103-12 IE must file:

1. Form 5500, except lines C, D, 1c, 2d, and 5 through 9. Enter “E” in part I, line A, as the DFE code.
2. Schedule A (as many as needed), to report insurance, annuity and investment contracts held by the 103-12 IE.
3. Schedule C, if applicable, to report service provider information and any terminated accountants.
4. Schedule D, to list all CCTs, PSAs, and 103-12 IEs in which the 103-12 IE invested at any time during the 103-12 IE’s year, and to list all plans that participated in the 103-12 IE during its year.
5. Schedule G, to report loans or fixed income obligations in default or determined to be uncollectible as of the end of the 103-12 IE year, leases in default or classified as uncollectible, and nonexempt transactions.
6. Schedule H, except lines 1b(1), 1b(2), 1c(8), 1d, 1e, 1g, 1h, 1i, 2a, 2b(1)(E), 2e, 2f, 2g, 4a, 4e, 4f, 4g, 4h, 4j, 4k, 4l, 4m, 4n, and 5, to report financial information.
7. Additional information required by the instructions to the above schedules, including, for example, the report of the independent qualified public accountant (IQPA) identified on Schedule H, line 3a, and the schedule(s) of assets held for investment. All attachments must be properly labeled.

Defined Contribution Group Reporting Arrangements (DCGs or DCG Reporting Arrangements)

Each defined contribution pension plan that reports as part of a DCG reporting arrangement is not required to file a separate Form 5500 if a consolidated Form 5500 report for all the plans in the DCG is filed by the common plan administrator of the plans in accordance with 29 CFR 2510.103-14 and 29 CFR 2520.104-51, including a Schedule DCG for each participating plan.

For reporting purposes, an arrangement is a DCG reporting arrangement only if all plans in the DCG:

1. are individual account plans or defined contribution plans;
2. have the same trustee as described in ERISA section 403(a) ("common trustee");
3. have the same one or more named fiduciaries designated in accordance with ERISA section 402(a) ("common fiduciaries"), however an individual employer may be a named fiduciary of each employer's own plan provided that the other named fiduciaries are the same and common to all plans;
4. have a designated plan administrator under ERISA section 3(16)(A) that is the same plan administrator for all the plans in the DCG ("common plan administrator");
5. have plan years beginning on the same date ("common plan year");
6. provide the same investments or investment options to participants and beneficiaries in all the plans ("common investments or common investment options"). Certain brokerage window arrangements would qualify as a common investment option. See 29 CFR 2520.104-51(c)(3)(ii);
7. do not hold any employer securities at any time during the plan year, except this does not prohibit investments in any employer's publicly traded securities within one of the "common investments or investment options" available to participants and beneficiaries in all the plans;
8. either obtain an audit by an IQPA and file the IQPA report with the DCG consolidated Form 5500, or be eligible for the waiver of the annual examination and report of an IQPA under 29 CFR 2520.104-46; and
9. not be a MEP (including a pooled employer plan) or a multiemployer plan.

The Form 5500 submitted for a DCG must comply with the Form 5500 instructions for a Large Pension Plan, unless otherwise specified in the forms and instructions. The DCG must file:

1. Form 5500, except lines C, 2d and 7. Enter "D" in Part I, line A, as the DFE code for the DCG.
2. Schedule A (as many as needed) to report insurance, annuity, and investment contracts held by the plans participating in a DCG.
3. Schedule C to report service provider information and any terminated accountants.
4. Schedule D, Part I only, to list all CCTs, PSAs, and 103-12 IEs in which DCG participating plans invested at any time during the DCG year.
5. Schedule DCG to report individual plan-level information such as the plan sponsor (i.e., employer), plan financial

information, number of participants, and other information.

6. Schedule G to report loans or fixed income obligations in default or determined to be uncollectible as of the end of the DCG year, leases in default or classified as uncollectible, and nonexempt transactions.

7. Schedule H, except lines 4e, 4f, 4k, 4l and 5, to report the DCG's financial information.

8. Additional information required by the instructions to the above schedules, including, for example, the report of the independent qualified public accountant (IQPA) identified on Schedule DCG, line 14a, unless the plan is eligible for the waiver of the annual examination and report of an IQPA under 29 CFR 2520.104-46. All attachments must be properly labeled.

Note. The information reported on all the Schedules, except Schedule DCG, is generally reported for all the plans in a DCG in the aggregate, except as otherwise provided.



The plan administrator's information entered on Part III, line 4 on each individual plan's Schedule DCG must be the DCG common plan administrator (i.e., the plan administrator listed on the Form 5500, Part II, line 3 for the DCG) in order for the plan to report in the DCG group.

Group Insurance Arrangement (GIA)

Each welfare benefit plan that is part of a group insurance arrangement is exempt from the requirement to file a Form 5500 if a consolidated Form 5500 report for all the plans in the arrangement was filed in accordance with 29 CFR 2520.104-43. For reporting purposes, a "group insurance arrangement" provides benefits to the employees of two or more unaffiliated employers (not in connection with a multiemployer plan or a collectively-bargained multiple-employer plan), fully insures one or more welfare plans of each participating employer, uses a trust or other entity as the holder of the insurance contracts, and uses a trust as the conduit for payment of premiums to the insurance company. The GIA must file:

1. Form 5500, except lines C and 2d. (Enter "G" in Part I, line A, as the DFE code).
2. Schedule A (as many as needed), to report insurance, annuity and investment contracts held by the GIA.
3. Schedule C, if applicable, to report service provider information and any terminated accountants.
4. Schedule D, to list all CCTs, PSAs, and 103-12 IEs in which the GIA invested at any time during the GIA year, and to list all plans that participated in the GIA during its year.
5. Schedule G, to report loans or fixed income obligations in default or determined to be uncollectible as of the end of the GIA year, leases in default or classified as uncollectible, and nonexempt transactions.
6. Schedule H, except lines 4a, 4e, 4f, 4g, 4h, 4k, 4m, 4n, and 5, to report financial information.
7. Additional information required by the instructions to the above schedules, including, for example, the report of the independent qualified public accountant (IQPA) identified on Schedule H, line 3a, the schedules of assets held for investment and the schedule of reportable transactions. All attachments must be properly labeled.

Quick Reference Chart of Form 5500, Schedules, and Attachments (Not Applicable for Form 5500-SF Filers)¹

	Large Pension Plan	Small Pension Plan ²	Large Welfare Plan	Small Welfare Plan ²	DFE
Form 5500	Must complete.	Must complete.	Must complete. ³	Must complete. ³	Must complete.
Schedule A (Insurance Information)	Must complete if plan has insurance contracts.	Must complete if plan has insurance contracts. ⁴	Must complete if plan has insurance contracts.	Must complete if plan has insurance contracts. ⁴	Must complete if MTIA, 103-12 IE, DCG or GIA has insurance contracts.
Schedule C (Service Provider Information)	Must complete Part I if service provider was paid \$5,000 or more, Part II if a service provider failed to provide information necessary for the completion of Part I, and Part III if an accountant or actuary was terminated.	Not required.	Must complete Part I if service provider was paid \$5,000 or more, Part II if a service provider failed to provide information necessary for the completion of Part I, and Part III if an accountant or actuary was terminated.	Not required.	MTIAs, GIAs, DCGs and 103-12 IEs must complete Part I if service provider paid \$5,000 or more, and Part II if a service provider failed to provide information necessary for the completion of Part I. GIAs and 103-12 IEs must complete Part III if accountant was terminated.
Schedule D (DFE/Participating Plan Information)	Must complete Part I if plan participated in a CCT, PSA, MTIA, or 103-12 IE.	Must complete Part I if plan participated in a CCT, PSA, MTIA, or 103-12 IE. ⁴	Must complete Part I if plan participated in a CCT, PSA, MTIA, or 103-12 IE.	Must complete Part I if plan participated in a CCT, PSA, MTIA, or 103-12 IE. ⁴	Must complete Part I if DFE participated in a CCT, PSA, or 103-12 IE. All DFEs, other than DCGs, must also complete Part II.
Schedule DCG (Individual Plan Information)	Individual plans participating in a DCG must complete to report individual plan-level information. ⁹	Individual plans participating in a DCG must complete to report individual plan-level information. ⁹	Not required.	Not required.	Individual plans participating in a DCG must complete to report individual plan-level information. ⁹
Schedule G (Financial Schedules)	Must complete if Schedule H, lines 4b, 4c, or 4d are "Yes."	Not required.	Must complete if Schedule H, lines 4b, 4c, or 4d are "Yes." ³	Not required. ³	Must complete if Schedule H, lines 4b, 4c, or 4d for a GIA, DCG, MTIA, or 103-12 IE are "Yes."
Schedule H (Financial Information)	Must complete. ⁵	Not required.	Must complete. ^{3, 5}	Not required.	All DFEs must complete Parts I, II, and III. MTIAs, 103-12 IEs, DCGs and GIAs must also complete Part IV. ⁵
Schedule I (Financial Information)	Not required.	Must complete. ⁴	Not required.	Must complete. ⁴	Not required.

	Large Pension Plan	Small Pension Plan²	Large Welfare Plan	Small Welfare Plan²	DFE
Schedule MB (Actuarial Information)	Must complete if multiemployer defined benefit plan or money purchase plan subject to minimum funding standards. ⁶	Must complete if multiemployer defined benefit plan or money purchase plan subject to minimum funding standards. ⁶	Not required.	Not required.	Not required.
Schedule MEP (Multiple-Employer Retirement Plan Information)	Must complete if multiple-employer pension plan. ⁸	Must complete if multiple-employer pension plan. ⁸	Not required.	Not required.	Not required.
Schedule R (Pension Plan Information)	Must complete. ⁷	Must complete. ^{4, 7}	Not required.	Not required.	Not required.
Schedule SB (Actuarial Information)	Must complete if single-employer or multiple-employer defined benefit plan, including an eligible combined plan and subject to minimum funding standards.	Must complete if single-employer or multiple-employer defined benefit plan, including an eligible combined plan and subject to minimum funding standards.	Not required.	Not required.	Not required.
Accountant's Report	Must attach.	Not required unless Schedule I, line 4k, is checked "No."	Must attach. ³	Not required.	Must attach for a GIA, 103-12 IE, or individual plans participating in a DCG that checked "Yes" on Schedule DCG, line 14. ⁹

¹ This chart provides only general guidance. Not all rules and requirements are reflected. Refer to specific Form 5500 instructions for complete information on filing requirements (e.g., *Who Must File* and *What To File*). For example, a pension plan is exempt from filing any schedules if the plan uses Code section 408 individual retirement accounts as the sole funding vehicle for providing benefits. See *Limited Pension Plan Reporting*.

² Pension plans and welfare plans with fewer than 100 participants at the beginning of the plan year that are not exempt from filing an annual return/report may be eligible to file the Form 5500-SF, a simplified report. In addition to the limitation on the number of participants, a Form 5500-SF may only be filed for a plan that is exempt from the requirement that the plan's books and records be audited by an independent qualified public accountant (but not by reason of enhanced bonding), has 100 percent of its assets invested in certain secure investments with a readily determinable fair market value, holds no employer securities, is not a multiemployer plan, is not required to file a Form M-1 (*Report for Multiple-Employer Welfare Arrangements (MEWAs) and Certain Entities Claiming Exception (ECEs)*) for the plan year, is not a pooled employer plan, and is not filing as part of a DCG reporting arrangement. See the Form 5500-SF instructions, *Who May File Form 5500-SF*.

³ Unfunded, fully insured, or combination unfunded/fully insured welfare plans covering fewer than 100 participants at the beginning of the plan year that meet the requirements of 29 CFR 2520.104-20 are exempt from filing an annual report. See *Who Must File*. Such a plan with 100 or more participants must file an annual report, but is exempt under 29 CFR 2520.104-44 from the accountant's report requirement and completing Schedule H, but MUST complete Schedule G, Part III, to report any nonexempt transactions. See *What To File*. All Plans required to file Form M-1 (*Report for Multiple-Employer Welfare Arrangements (MEWAs) and Certain Entities Claiming Exception (ECEs)*) must file a Form 5500 regardless of plan size or type of funding.

⁴ Do not complete if filing the Form 5500-SF instead of the Form 5500.

⁵ Schedules of assets and reportable (5%) transactions also must be filed with the Form 5500 if Schedule H, line 4i or 4j is "Yes."

⁶ Money purchase defined contribution plans that are amortizing a funding waiver are required to complete lines 3, 9, and 10 of the Schedule MB in accordance with the instructions. Also see instructions for line 5 of Schedule R and line 12a of Form 5500-SF.

⁷ Schedule R should not be completed when the Form 5500 Annual Return/Report is filed for a pension plan that uses, as the sole funding vehicle for providing benefits, individual retirement accounts or annuities (as described in Code section 408). See the Form 5500 instructions for Limited Pension Plan Reporting for more information.

⁸ All multiple-employer pension plans must complete Schedule MEP, Parts I and II. Multiple-employer pension plans that are pooled employer plans must also complete Schedule MEP, Part III.

⁹ Individual plans participating in a DCG must attach the report of an independent qualified public accountant (IQPA) identified on Schedule DCG, line 14a unless the plan is eligible for the waiver of the annual examination and report of an IQPA under 29 CFR 2520.104-46.

Section 5: Line-by-Line Instructions for the 2025 Form 5500 and Schedules

Part I – Annual Return/Report Identification Information

File the 2025 Form 5500 Annual Return/Report for a plan year that began in 2025 or a DFE year that ended in 2025. Enter the beginning and ending dates in Part I. The 2025 Form 5500 Annual Return/Report must be filed electronically.

One Form 5500 is generally filed for each plan or entity described in the instructions to the boxes in line A. **Do not check more than one box.**

A separate Form 5500, with line A (single-employer plan) checked, must be filed by each employer participating in a plan or program of benefits in which the funds attributable to each employer are available to pay benefits only for that employer's employees, even if the plan is maintained by a controlled group.

A "controlled group" is generally considered one employer for Form 5500 reporting purposes. A "controlled group" is a controlled group of corporations under Code section 414(b), a group of trades or businesses under common control under Code section 414(c), or an affiliated service group under Code section 414(m).

Line A –Box for Multiemployer Plan. Check this box if the Form 5500 is filed for a multiemployer plan. A plan is a multiemployer plan if: **(a)** more than one employer is required to contribute, **(b)** the plan is maintained under one or more collective bargaining agreements between one or more employee organizations and more than one employer; **(c)** an election under Code section 414(f)(5) and ERISA section 3(37)(E) has not been made; and **(d)** the plan meets any other applicable conditions of 29 CFR 2510.3-37. A plan that has made a proper election under ERISA section 3(37)(G) and Code section 414(f)(6) on or before August 17, 2007, is also a multiemployer plan. Participating employers do not file individually for these plans.

Line A –Box for Single-Employer Plan. Check this box if the Form 5500 is filed for a single-employer plan. A single-employer plan for this Form 5500 reporting purpose is an employee benefit plan maintained by one employer or one employee organization.

Line A –Box for Multiple-Employer Plan. Check this box if the Form 5500 is being filed for a multiple-employer plan, including a multiple-employer 403(b) plan. A multiple-employer plan is a plan that is maintained by more than one employer and is not one of the plans already described. A multiple-employer plan can be collectively bargained and collectively funded, but, if covered by PBGC termination insurance, must have properly elected before September 27, 1981, not to be treated as a multiemployer plan under Code section 414(f)(5) or ERISA sections 3(37)(E) and 4001(a)(3), and have not revoked that election or made an election to be treated as a multiemployer plan under Code section 414(f)(6) or ERISA section 3(37)(G). A single Form 5500 Annual Return/Report is filed for the multiple-employer plan; participating employers do not file individually for this type of plan.

A pooled employer plan as defined in ERISA section 3(43) operated by a "pooled plan provider" that meets the definition under ERISA section 3(44) is a multiple-employer plan.

All multiple-employer pension plans that check this box must file Schedule MEP, Multiple-Employer Retirement Plan Information (see Schedule MEP filing instructions for additional details) to report information about the participating employers.

Note. Do not check this box if all of the employers maintaining the plan are members of the same controlled group or affiliated service group under Code sections 414(b), (c), or (m). Do not check this box for a DCG. See line A Box for Direct Filing Entity (DFE).

Participating Employer Information. Multiple-employer welfare plans required to file a Form 5500 do not file Schedule MEP but instead must include an attachment using the format below. The attachment must be properly identified at the top with the label "Multiple-Employer Welfare Plan Participating Employer Information," and the name of the plan, EIN, and plan number (PN) as found on the plan's Form 5500. Complete as many entries as needed to report the required information for all participating employers in the plan.

Except as provided below, all multiple-employer welfare plans must complete elements 1-3 of the "Multiple-Employer Welfare Plan Participating Employer Information" attachment.

For element 3, enter a good faith estimate of each employer's percentage of the total contributions (including employer and participant contributions) made by all participating employers during the year. The percentage may be rounded to the nearest whole percentage. To the extent the rounding results in the total reported percentage being either slightly above or slightly below 100 percent, the filer can indicate that on the attachment. Any employer who was obligated to make contributions to the plan for the plan year, who made contributions to the plan for the plan year, or whose employees were covered under the plan is a "participating employer" for this purpose. If a participating employer made no contributions, enter "-0-" in element 3.

Multiple-employer welfare plans that are unfunded, fully insured, or a combination of unfunded/insured and exempt under 29 CFR 2520.104-44 from the obligation to file financial statements with their annual report are required to complete elements 1 and 2 only of the "Multiple-Employer Welfare Plan Participating Employer Information" attachment.

Multiple-Employer Welfare Plan Participating Employer Information (Insert Name of Plan and EIN/PN as shown on the 5500)		
1. Name of participating employer	2. EIN	3. Percent of Total Contributions for Plan Year
1. Name of participating employer	2. EIN	3. Percent of Total Contributions for Plan Year
1. Name of participating employer	2. EIN	3. Percent of Total Contributions for Plan Year
1. Name of participating employer	2. EIN	3. Percent of Total Contributions for Plan Year

1. Name of participating employer	2. EIN	3. Percent of Total Contributions for Plan Year
Complete as many rows as needed to report the required information for all participating employers in the plan.		

Line A –Box for Direct Filing Entity (DFE). Check this box and enter the correct letter from the following chart in the space provided to indicate the type of entity.

Type of entity ▼	Enter the letter ▼
Master Trust Investment Account	M
Common/Collective Trust	C
Pooled Separate Account	P
103-12 Investment Entity	E
Defined Contribution Group (DCG)	D
Group Insurance Arrangement	G

Note. A separate annual report with “M” entered as the DFE code on Form 5500, line A, must be filed for each MTIA. See instructions on page 11.

Line B –Box for First Return/Report. Check this box if an annual return/report has not been previously filed for this plan or DFE. For the purpose of completing this box, the Form 5500-EZ is not considered an annual return/report.

Line B –Box for Amended Return/Report. Check this box if you have already filed for the 2025 plan year and are now filing an amended return/report to correct errors and/or omissions on the previously filed return/report. See instructions on page 6.

Note. If an individual plan amended Schedule DCG to correct errors and/or omissions in a previously filed Schedule DCG, the DCG must submit an amended Form 5500, and include all Schedules DCG for participating plans that were submitted with the original return. The line B box for “an amended return/report” on the Form 5500 must be checked. The line F box for “an amended Schedule DCG” on the Schedule DCG must be checked on only those Schedules DCG that have been changed from the original submission.

TIP Check the line B box for an “amended return/report” if you filed a previous 2025 annual return/report that was given a “Filing_Received,” “Filing_Error,” or “Filing_Stopped” status by EFAST2. Do not check the line B box for an “amended return/report” if your previous submission attempts were not successfully received by EFAST2 because of problems with the transmission of your return/report. For more information, go to the EFAST2 website at www.efast.dol.gov or call the EFAST2 Help Desk at 1-866-GO-EFAST (1-866-463-3278).

Line B –Box for Final Return/Report. Check this box if this Form 5500 is the last annual return/report required to be submitted for this plan. (See *Final Return/Report*.)

Note. Do not check box B (Final Return/Report) if “4R” is entered on line 8b for a welfare plan that is not required to file a Form 5500 for the next plan year because the welfare plan has become eligible for an annual reporting exemption. For example, certain unfunded and insured welfare plans may be required to file the 2025 Form 5500 and be exempt from filing a

Form 5500 for the plan year 2025 if the number of participants covered as of the beginning of the 2025 plan year drops below 100. See *Who Must File*. Should the number of participants covered by such a plan increase to 100 or more in a future year, the plan must resume filing Form 5500 and enter “4S” on line 8b on that year’s Form 5500. See 29 CFR 2520.104-20.

Line B –Box for Short Plan Year Return/Report. Check this box if this Form 5500 is being filed for a plan year period of less than 12 months. Provide the dates in Part I, Plan Year Beginning and Ending.

Line C –Box for Collectively-Bargained Plan. Check this box when the contributions to the plan and/or the benefits paid by the plan are subject to the collective bargaining process (even if the plan is not established and administered by a joint board of trustees and even if only some of the employees covered by the plan are members of a collective bargaining unit that negotiates contributions and/or benefits). The contributions and/or benefits do not have to be identical for all employees under the plan.

Line D –Box for Extension Using Form 5558. Check this box if you filed for an extension of time using the IRS Form 5558. Please see **Instructions for Form 5558** for more information. (A copy of the Form 5558 must be retained with the filer’s records).

Line D –Box for Extension Using Automatic Extension. Check this box if you are filing using the automatic extension of time to file Form 5500 until the due date of the federal income tax return of the employer (maintain a copy of the employer’s extension of time to file the income tax return with the filer’s records).

Line D –Box for Extension Using Special Extension. Check this box if you are filing using a special extension of time to file the Form 5500 that has been announced by the IRS, DOL, and PBGC. If you checked that you are using a special extension of time, enter a description of the extension of time in the space provided.

Line D –Box for Filing Under the DFVC Program. Check this box if you are filing under DOL’s Delinquent Filer Voluntary Compliance (DFVC) Program.



Checking this box does not enter you in the DFVC Program. You can enter the program at this site: www.dol.gov/agencies/ebsa/employers-and-advisers/plan-administration-and-compliance/correction-programs/dfvcp

See additional information on the DFVC Program at www.dol.gov/sites/dolgov/files/EBSA/about-ebsa/our-activities/resource-center/faqs/dfvcp.pdf, including filing by mail.

Applying and paying electronically to the DFVC Program is strongly recommended.

Line E – Box for a retroactively adopted plan as permitted by SECURE Act section 201. Check this box if the plan sponsor adopted the plan during the 2025 plan year (i.e., by the due date, including extension, for filing the plan sponsor’s tax return for the 2024 taxable year) and elected to treat the plan as having been adopted before the 2025 plan year began (i.e., at the close as of the last day of the sponsor’s taxable year) as permitted by section 201 of the Setting Every Community Up for Retirement Enhancement Act of 2019 (SECURE ACT). Plans in this situation are not required to file a 2024 Form 5500. However, if the plan is a defined benefit pension plan, the 2024 Schedule SB (Form 5500) must be included as an attachment to the 2025 Schedule SB (Form 5500) as part of the 2025 Form 5500. Please see **Instructions for Schedule SB** for more information.

Part II – Basic Plan Information

Line 1a. Enter the formal name of the plan or DFE or enough information to identify the plan or DFE. Abbreviate if necessary. 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), use the same name or abbreviation as was used on the prior filings. Once you use an abbreviation, continue to use it 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. If the plan has changed its name from the prior year filing(s), complete line 4 to indicate that the plan was previously identified by a different name.

Line 1b. Enter the three-digit plan or entity number (PN) the employer or plan administrator assigned to the plan or DFE. 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.

For each Form 5500 with the same EIN (line 2b), when ▼	Assign PN ▼
Part II, line 8a is completed, or Part I, line A, for a DFE is checked and an M, C, P, D or E is entered	001 to the first plan or DFE. Consecutively number others as 002, 003...
Part II, line 8b is completed and 8a is not checked, or Part I, line A, for a DFE is checked and a G is entered	501 to the first plan or GIA. Consecutively number others as 502, 503...

Exception. If Part II, line 8a is completed and 333 (or a higher number in a sequence beginning with 333) was previously assigned to the plan, that number may be entered on line 1b.

Line 1c. Enter the date the plan first became effective.

Line 2a. Limit your response to the information required in each row as specified below:

1. Enter the name of the plan sponsor or, in the case of a Form 5500 filed for a DFE, the name of the insurance company, financial institution, or other sponsor of the DFE (e.g., in the case of a GIA, the trust or other entity that holds the insurance contract, in the case of an MTIA, one of the sponsoring employers, or in the case of a DCG, the DCG sponsor, but, if an individual sponsor cannot be identified, enter the common plan administrator's name and be sure to check the box in line 3a). If the plan covers only the employees of one employer, enter the employer's name.

The term "plan sponsor" otherwise 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;
- 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;

- The pooled plan provider that operates the plan, in the case of a pooled employer plan that meets the definition under ERISA section 3(43); or
- The professional employer organization (PEO), in the case of a PEO multiple-employer plan that meets the conditions under 29 CFR 2510.3-55(c).

Note. In the case of a multiple-employer plan or DCG, file only one annual return/report for the plan or DCG. If an association, pooled plan provider, PEO, or other entity listed above is not the sponsor, enter the name of a participating employer as sponsor. A plan of a controlled group of corporations should enter the name of one of the sponsoring members. In either case, the same name must be used in all subsequent filings of the Form 5500 for the multiple-employer plan or controlled group (see instructions to line 4 concerning change in sponsorship).

2. Enter any "in care of" (C/O) name.
3. Enter the current street address. A post office box number may be entered if the Post Office does not deliver mail to the sponsor's street address.
4. Enter the name of the city.
5. Enter the two-character abbreviation of the U.S. state or possession and zip code.
6. Enter the foreign routing code, if applicable. Leave U.S. state and zip code blank if entering a foreign routing code and country name.
7. Enter the foreign country, if applicable.
8. Enter the D/B/A (the doing business as) or trade name of the sponsor if different from the plan sponsor's name.
9. Enter any second address. Use only a street address here, not a P.O. Box.

Note. Use the IRS Form 8822-B, *Change of Address or Responsible Party – Business*, to notify the IRS if the address provided here is a change in your business mailing address or your business location.

Line 2b. Enter the nine-digit employer identification number (EIN) assigned to the plan sponsor/employer, for example, 00-1234567. In the case of a DFE, enter the employer identification number (EIN) assigned to the CCT, PSA, MTIA, 103-12 IE, DCG or GIA.

Do not use a social security number in lieu of an EIN. 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.

Plan sponsor/employers without an EIN must apply for one as soon as possible. The EBSA does not issue EINs. To apply for an EIN from the IRS:

- Mail or fax Form SS-4, Application for Employer Identification Number, obtained at www.irs.gov/orderforms.
- See www.IRS.gov/Businesses and click on "Employer ID Numbers" for additional information. The EIN is issued immediately once the application information is validated. (The online application process is not yet available for corporations with addresses in foreign countries or Puerto Rico.)

A multiple-employer plan or plan of a controlled group of corporations should use the EIN of the sponsor identified in line 2a. The EIN must be used in all subsequent filings of the Form 5500 for these plans (see instructions to line 4 concerning change in EIN).

If the plan sponsor is a group of individuals, get a single EIN for the group. When you apply for the EIN, provide the name of the group, such as "Joint Board of Trustees of the Local 187 Machinists' Retirement Plan." (If filing Form SS-4, enter the group name on line 1.)

Note. EINs for funds (trusts or custodial accounts) associated with plans (other than DFEs) are generally not required to be furnished on the Form 5500; the IRS will issue EINs for such funds for other reporting purposes. EINs may be obtained as explained above. Plan sponsors should use the trust EIN described above when opening a bank account or conducting other transactions for a trust that require an EIN.

Line 2c. Enter the telephone number for the plan sponsor. Use numbers only, including area code, and do not include any special characters.

Line 2d. Enter the six-digit business code from the list of business codes on pages 94, 95, and 96 that:

- In the case of a single-employer plan, best describes the primary nature of the plan sponsor's business, and
- In the case of a multiemployer plan, best describes the predominant industry in which the active participants are employed (e.g., 484120 - General Freight Trucking, Long-distance, 236110 - Residential Building Construction).

Do not enter code 525100 (Insurance & Employee Benefit Funds) or 813930 (Labor Unions and Similar Labor Organizations) unless the predominant industry in which the active participants are employed is the industry of insurance and employee benefit funds, or labor unions and similar labor organizations.

Line 3a. Please limit your response to the information required:

1. Enter the name and address of the plan administrator unless the administrator is the sponsor identified in line 2. If both the plan administrator name and address are the same as the plan sponsor name and address, check the "Same as Plan Sponsor" box and disregard items 2 through 6 below. If the Form 5500 is submitted for a DFE, check the appropriate box in Part I, line A, and enter the appropriate DFE code.

The term "plan administrator" means:

- The person or group of persons specified as the administrator by the instrument under which the plan is operated;
- The pooled plan provider that operates the plan, in the case of a pooled employer plan that meets the definition under ERISA section 3(43);
- The professional employer organization (PEO), in the case of a PEO multiple-employer plan that meets the conditions under 29 CFR 2510.3-55(c);
- The common plan administrator that is the same administrator for all the plans participating in a DCG, in the case of the DCG that meets the conditions under 29 CFR 2520.104-51;
- The plan sponsor/employer if an administrator is not so designated; or
- Any other person prescribed by regulations if an administrator is not designated and a plan sponsor cannot be identified.

2. Enter any "in care of" (C/O) name.

3. Enter the current street address. A post office box

number may be entered if the Post Office does not deliver mail to the administrator's street address.

4. Enter the name of the city.


5. Enter the two-character abbreviation of the U.S. state or possession and zip code.

6. Enter the foreign routing code and foreign country, if applicable. Leave U.S. state and zip code blank if entering foreign routing code and country information.


Line 3b. Enter the plan administrator's nine-digit EIN. A plan administrator must have an EIN for Form 5500 reporting purposes. If the plan administrator does not have an EIN, apply for one as explained in the instructions for line 2b. One EIN should be entered for a group of individuals who are, collectively, the plan administrator.

Line 3c. Enter the telephone number for the plan administrator. Use numbers only, including area code, and do not include any special characters.

Note. 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.

 *In the case of a pooled employer plan, information for the pooled employer plan and the pooled plan provider operating the plan reported on the Form 5500 must match the information reported on the Form PR. Failure to report the same information could result in correspondence from the Department of Labor or the Internal Revenue Service.*

Line 4. If the plan sponsor's or DFE's name and/or EIN have changed or the plan name has changed since the last return/report was filed for this plan or DFE, enter the plan sponsor's or DFE's name, EIN, the plan name, and the plan number as it appeared on the last return/report filed.

 *The failure to indicate on line 4 that a plan sponsor was previously identified by a different name or a different employer identification number (EIN) or that the plan name has been changed could result in correspondence from the DOL and/or the IRS.*

Lines 5 and 6. All filers **must** complete both lines 5 and 6 unless the Form 5500 is filed for an IRA Plan described in *Limited Pension Plan Reporting*, MTIA, CCT, PSA or 103-12 IE.

Note. Welfare plans complete only lines 5, 6a(1), 6a(2), 6b, 6c, and 6d.

The description of "participant" in the instructions below is only for purposes of these lines.

An individual becomes a participant covered under an employee welfare benefit plan on the earliest of:

- the date designated by the plan as the date on which the individual begins participation in the plan;
- the date on which the individual becomes eligible under the plan for a benefit subject only to occurrence of the contingency for which the benefit is provided; or
- the date on which the individual makes a contribution to the plan, whether voluntary or mandatory.

See 29 CFR 2510.3-3(d)(1). This includes former employees who are receiving group health continuation coverage benefits under Part 6 of ERISA and who are covered by the employee welfare benefit plan. Covered dependents are not counted as participants. A child who is an "alternate recipient" entitled to health benefits under a qualified medical child support order (QMCSO) should not be counted as a participant for lines 5 and 6. An individual is not a participant covered under an employee welfare plan on the earliest date

on which the individual (a) is ineligible to receive any benefit under the plan even if the contingency for which such benefit is provided should occur, and (b) is not designated by the plan as a participant. See 29 CFR 2510.3-3(d)(2).



Before counting the number of participants, especially in a welfare benefit plan, it is important to determine whether the plan sponsor has established one or more plans for Form 5500/Form 5500-SF reporting purposes. As a matter of plan design, plan sponsors can offer benefits through various structures and combinations. For example, a plan sponsor could create (i) one plan providing major medical benefits, dental benefits, and vision benefits, (ii) two plans with one providing major medical benefits and the other providing self-insured dental and vision benefits; or (iii) three separate plans. You must review the governing documents and actual operations to determine whether welfare benefits are being provided under a single plan or separate plans.

The fact that you have separate insurance policies for each different welfare benefit does not necessarily mean that you have separate plans. Some plan sponsors use a “wrap” document to incorporate various benefits and insurance policies into one comprehensive plan. In addition, whether a benefit arrangement is deemed to be a single plan may be different for purposes other than Form 5500/Form 5500-SF reporting. For example, special rules may apply for purposes of HIPAA, COBRA, and Internal Revenue Code compliance. If you need help determining whether you have a single welfare benefit plan for Form 5500/Form 5500-SF reporting purposes, you should consult a qualified benefits consultant or legal counsel.

For pension benefit plans, “alternate payees” entitled to benefits under a qualified domestic relations order (QDRO) are not to be counted as participants for this line.

For pension benefit plans, “participant” for this line means any individual who is included in one of the categories below:

1. Active participants (i.e., any individuals who are currently in employment covered by the plan and who are earning or retaining credited service under the plan). This includes any individuals who are eligible to elect to have the employer make payments under a Code section 401(k) qualified cash or deferred arrangement. Active participants also include any nonvested individuals who are earning or retaining credited service under the plan. This does not include (a) nonvested former employees who have incurred the break in 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.

2. Retired or separated participants receiving benefits (i.e., individuals who are retired or separated from employment covered by the plan and who are receiving benefits under the plan). This does not include any individual to whom an insurance company has made an irrevocable commitment to pay all the benefits to which the individual is entitled under the plan.

3. Other retired or separated participants entitled to future benefits (i.e., any individuals who are retired or separated from employment covered by the plan and who are entitled to begin receiving benefits under the plan in the future). This does not include any individual to whom an insurance company has made an irrevocable commitment to pay all the benefits to which the individual is entitled under the plan.

4. Deceased individuals who had one or more beneficiaries who are receiving or are entitled to receive benefits under the plan. This does not include any individual to whom an insurance company has made an irrevocable commitment to pay all the benefits to which the beneficiaries of that individual

are entitled under the plan.

Line 6g. Enter in line 6g(1) the total number of participants included on line 5 (total participants at the beginning of the plan year) who have account balances at the beginning of the plan year. Enter in line 6g(2) the total number of participants included on line 6f (total participants at the end of the plan year) who have account balances at the end of the plan year. For example, for a Code section 401(k) plan, the number entered on line 6g(2) should be the number of participants counted on line 6f who have made a contribution, or for whom a contribution has been made, to the plan for this plan year or any prior plan year. Defined benefit plans do not complete line 6g.

Line 6h. Include any individual who terminated employment during this plan year, whether or not the individual (a) incurred a break in service, (b) received an irrevocable commitment from an insurance company to pay all the benefits to which the individual is entitled under the plan, and/or (c) received a cash distribution or deemed cash distribution of their nonforfeitable accrued benefit. Multiemployer plans and multiple-employer plans that are collectively bargained do not have to complete line 6h.

Line 7. Only multiemployer plans should complete line 7. Multiemployer plans must enter the total number of employers obligated to contribute to the plan. For purposes of line 7 of the Form 5500, an employer obligated to contribute is defined as an employer who, during the 2025 plan year, is a party to the collective bargaining agreement(s) under which the plan is maintained or who may otherwise be subject to withdrawal liability under ERISA section 4203. Any two or more contributing entities (e.g., places of business with separate collective bargaining agreements) that have the same nine-digit employer identification number (EIN) must be aggregated and counted as one employer for this purpose.

Line 8 - Benefits Provided Under the Plan. Do not leave blank. In the boxes for line 8a and 8b, as appropriate, enter all applicable two-character plan characteristic codes that applied during the reporting year from the List of Plan Characteristic Codes on pages 21 and 22 that describe the characteristics of the plan being reported.

Note. In the case of an eligible combined plan under Code section 414(x) and ERISA section 210(e), the codes entered in line 8a must include any codes applicable for either the defined benefit pension features or the defined contribution pension features of the plan.



For plan sponsors of Puerto Rico plans, enter characteristic code 3C only if:

- i. only Puerto Rico residents participate,*
- ii. the trust is exempt from income tax under the laws of Puerto Rico, and*
- iii. the plan administrator has not made the election under ERISA section 1022(i)(2), and, therefore, the plan is not intended to qualify under section 401(a) of the Internal Revenue Code (U.S.).*

Line 9 - Funding and Benefit Arrangements. Check all boxes that apply to indicate the funding and benefit arrangements used during the plan year. The “funding arrangement” is the method for the receipt, holding, investment, and transmittal of plan assets prior to the time the plan actually provides benefits. The “benefit arrangement” is the method by which the plan provides benefits to participants. For purposes of line 9:

“Insurance” means the plan has an account, contract, or policy with an insurance company, insurance service, or other similar organization (such as Blue Cross Blue Shield, or a

health maintenance organization) during the plan or DFE year. (This includes investments with insurance companies such as guaranteed investment contracts (GICs).) An annuity account arrangement under Code section 403(b)(1) that is required to complete the Form 5500 should mark “insurance” for both the plan funding arrangement and plan benefit arrangement. Do not check “insurance” if the sole function of the insurance company was to provide administrative services.

“**Code section 412(e)(3) insurance contracts**” are contracts that provide retirement benefits under a plan that are guaranteed by an insurance carrier. In general, such contracts must provide for level premium payments over the individual’s period of participation in the plan (to retirement age), premiums must be timely paid as currently required under the contract, no rights under the contract may be subject to a security interest, and no policy loans may be outstanding. If a plan is funded exclusively by the purchase of such contracts, the otherwise applicable minimum funding requirements of Code section 412 and ERISA section 302 do not apply for the year and neither the Schedule MB nor the Schedule SB is required to be filed.

“**Trust**” includes any fund or account that receives, holds, transmits, or invests plan assets other than an account or policy of an insurance company. A custodial account arrangement under Code section 403(b)(7) that is required to complete the Form 5500 should mark “trust” for both the plan funding arrangement and the plan benefit arrangement.

“**General assets of the sponsor**” means either the plan had no assets or some assets were commingled with the general assets of the plan sponsor prior to the time the plan actually provided the benefits promised.

Example. If the plan holds all its assets invested in registered investment companies and other non-insurance company investments until it purchases annuities to pay out the benefits promised under the plan, box 9a(3) should be checked as the funding arrangement and box 9b(1) should be checked as the benefit arrangement.

Note. An employee benefit plan that checks boxes 9a(1), 9a(2), 9b(1), and/or 9b(2) must attach **Schedule A (Form 5500)**, Insurance Information, to provide information concerning each contract year ending with or within the plan year. See the instructions to the Schedule A and enter the number of Schedules A on line 10b(3), if applicable.

Line 10. Check the boxes on line 10 to indicate the schedules being filed and, where applicable, count the schedules and enter the number of attached schedules in the space provided.

Form M-1 Compliance Information (to be provided by all welfare plans).

Line 11a. All plans providing welfare benefits must complete Part III, line 11a by answering either “Yes” or “No.” Do not leave the answer blank. If the plan is a multiple-employer welfare arrangement or an Entity Claiming Exception (ECE) subject to the Form M-1, *Report for Multiple-Employer Welfare Arrangements (MEWAs) and Certain Entities Claiming Exception (ECEs)* filing requirements, check “Yes” and complete line 11, elements 11b and 11c. If the answer is “No,” skip elements 11b and 11c of line 11.

Generally, a Form M-1 must be filed each year by March 1st following the calendar year in which a plan operates subject to the Form M-1 filing requirement. (For example, a plan MEWA that was operating in 2025 must file the 2025 Form M-1 annual report by March 1, 2026.) In addition, Form M-1 filings are necessary in the case of certain registration, origination, or special events. See the instructions for Form M-1 at

www.askebsa.dol.gov/mewa, and 29 CFR 2520.101-2 for more information regarding the Form M-1 filing requirements for plan MEWAs and ECEs.

Line 11b. All plans that answered “Yes” in line 11a must complete line 11b by answering either “Yes” or “No.” Do not leave the answer blank.

Line 11c. All plans that answered “Yes” in line 11a must enter a Receipt Confirmation Code for the 2025 Form M–1 annual report that was required to be filed with the Department of Labor under the Form M–1 filing requirements. The Receipt Confirmation Code is a unique code generated by the Form M–1 electronic filing system. You can find this code under the “completed filings” area when you log into your Form M–1 electronic filing system at www.askebsa.dol.gov/mewa.

If a plan that is subject to the Form M-1 filing requirements was not required to file a 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 on or before the date of filing the 2025 Form 5500. (For example, if a plan was not required to file a 2025 Form M–1 annual report by March 1, 2026, for the 2025 calendar year because it experienced a registration event between October 1 and December 31, 2025, and made a timely Form M–1 registration filing, the plan must enter on line 11c of the 2025 Form 5500 the Receipt Confirmation Code issued for the Form M–1 registration filing.)



A welfare benefit plan’s failure to answer line 11a, and if applicable, lines 11b and 11c, or enter a valid Receipt Confirmation Code in line 11c, will subject the Form 5500 filing to rejection as incomplete and civil penalties may be assessed under ERISA Section 502(c)(2) and 29 CFR 2560.502c-2.

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

CODE	Defined Benefit Pension Features	CODE	Defined Contribution Pension Features
1A	Benefits are primarily pay related.	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).
1B	Benefits are primarily flat dollar (includes dollars per year of service).	2B	Target benefit plan.
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).	2C	Money purchase (other than target benefit) plan.
1D	Floor-offset plan – to offset for retirement benefits provided by an employer-sponsored defined contribution plan.	2D	Offset plan – Plan benefits are subject to offset for retirement benefits provided in another plan or arrangement of the employer.
1E	Code section 401(h) arrangement – Plan contains separate accounts under Code section 401(h) to provide employee health benefits.	2E	Profit-sharing plan.
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).	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.
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.	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.
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.	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.
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).	2I	Stock bonus.
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.	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.
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.	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.
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.	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 CHARACTERISTIC CODES FOR LINES 8a AND 8b (Continued)

2R	Participant-directed brokerage accounts provided as an investment option under the plan.	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.
2S	401(k) plan or 403(b) plan that provides for automatic enrollment in plan that has elective contributions deducted from payroll.	CODE	Welfare Benefit Features
2T	Total or partial participant-directed account plan – plan uses default investment account for participants who fail to direct assets in their account.	4A	Health (other than vision or dental).
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).	4B	Life insurance.
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).	4C	Supplemental unemployment.
2W	Multiple-employer pension plan that is a pooled employer plan that meets the definition under ERISA section 3(43).	4D	Dental.
2X	Multiple-employer defined contribution pension plan that does not fall under characteristic codes 2U, 2V or 2W.	4E	Vision.
2Y	Pension-linked emergency savings account – A short-term savings account established as part of the plan in accordance with ERISA section 801.	4F	Temporary disability (accident and sickness).
CODE	Other Pension Benefit Features	4G	Prepaid legal.
3B	Use this code if the plan covered self-employed individuals in the return year.	4H	Long-term disability.
3C	Plan not intended to be qualified - A plan not intended to be qualified under Code sections 401, 403, or 408.	4I	Severance pay.
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.	4J	Apprenticeship and training.
3F	Plan sponsor(s) received services of leased employees, as defined in Code section 414(n), during the plan year.	4K	Scholarship (funded).
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).	4L	Death benefits (include travel accident but not life insurance).
3I	Plan requiring that all or part of employer contributions be invested and held, at least for a limited period, in employer securities.	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).