2012

Reporting and Disclosure Requirements

Under Ongoing Qualified Calendar-Year Plans

Reporting Requirements

| Item | Description | Recipient | Due Date |
|--|--|----------------|--|
| Form 1099-R | Report of distributions from pensions, annuities, retirement or profit-sharing plans, IRAs, insurance contracts, etc. | IRS and payees | 1/31/2012 payees 2/28/2012 (4/2/2012* if filed electronically) IRS; additional 30 days to file with IRS if extension requested |
| PBGC Estimated Flat- Rate Premium Filing | Estimated flat-rate premium payment for defined benefit plans with 500 or more participants | PBGC | 2/29/2012 |
| Form 11-K | Annual report required where employee contributions may be invested in company stock | SEC | 6/28/2012 |
| Form 5558 | Application for extension of time to file Form 5500 and/ or Form 8955-SSA; extension up to 2½ months after the normal due date. Not required if filer uses automatic extension to 9/17/2012,* i.e., plan year and employer tax year the same and employer granted extension for tax return | IRS | 7/31/2012 |
| Form 5500 (including applicable schedules and attachments) | Annual return/report of employee benefit plan | DOL | 7/31/2012 (9/17/2012 * if automatic extension applies; 10/15/2012 if extension requested) |
| Form 8955-SSA | Annual statement identifying participants with deferred vested benefits | IRS | 1/17/2012 (special due date for 2009 and 2010 filings) 7/31/2012 (9/17/2012* if automatic extension applies; 10/15/2012 if extension requested) |
| Comprehensive PBGC Premium Filing | Final flat-rate premium payment and variable-rate premium payment | PBGC | 10/15/2012 (plans with 100 or more participants; variable-rate premium can be an estimate with true-up by 4/30/2013 if certain conditions are met) 4/30/2013 (if fewer than 100 participants) |
| PBGC Reporting for Underfunded Plans | Annual reporting of financial and actuarial information. Required when any plan in the controlled group has a funding ratio below 80%** | PBGC | 4/16/2012* (if all nonexempt controlled group members have the same non-calendar fiscal year, 105 days [or 106 days if 105-day reporting period includes February 29] after close of fiscal year) |

^{*}The IRS, DOL or PBGC, as applicable, extends the filing due date to the following business day when the due date falls on a weekend or holiday.

Disclosure Requirements

| Item | Description | Recipient | Due Date |
|--|---|---|--|
| Summary of Material Modifications (SMM) | Summary of any change to SPD information if material change adopted in 2011 | Participants and beneficiaries | 7/28/2012* |
| Summary Annual Report (SAR) | Summary information on plan's financial activities as reported on Form 5500 (not applicable to defined benefit plans subject to Title IV of ERISA) | Participants and beneficiaries | 9/30/2012* or two months after Form 5500 is due, if later |
| Summary Plan Description (SPD) | Summary of plan in easily understandable language | Participants and beneficiaries | Within 90 days after individual becomes a participant or beneficiary entitled to benefits |
| Participant Benefit Statement | Statement including participant's total accrued benefit, vested benefit and certain other information | Participants and beneficiaries | DC plans: quarterly if participant directs investments, otherwise annually; DB plans: every three years or provide annual notice of availability |
| Annual Funding Notice | Notice of plan's funding status. Required for defined benefit plans subject to Title IV of ERISA | Participants, beneficiaries, labor organizations (if applicable), PBGC (if more than \$50 million underfunded) | 4/29/2012* Plans with 100 or fewer participants may have additional time to furnish |
| Rollover Notice | Explanation of direct rollover option and related federal income tax rules | Recipients of eligible Generally, not less than 30 and not more than 180 days before rollover distributions the date of distribution; 30 days may be waived by recipient | |
| Optional Forms Explanations | Explanation of payment options, right to defer and consequences of not deferring | under certain conditions Recipients of distributions | |
| QJSA Notice | Written explanation of qualified joint and survivor annuity provisions, relative values and election procedures. Required for plans subject to joint and survivor rules (generally, defined benefit and money purchase pension plans) | Participants Generally, not less than 30 and not more than 180 days befor the annuity starting date; 30 days may be waived by recipient under certain conditions | |
| QPSA Notice | Written explanation of plan's qualified preretirement survivor annuity provisions. May be required for plans subject to joint and survivor rules (generally, defined benefit and money purchase pension plans) | Participants Generally, between first day of plan year in which participant reaches age 32 and end of plan year prior to attaining age 3 or one year after the individual becomes a participant, if late | |
| Suspension of Benefits Notice | Explanation of why benefit payments are being suspended upon reemployment or continued employment after reaching normal retirement age | Participants who commenced receiving benefit payments that are suspended because of reemployment or who continue working after their normal retirement age and do not commence benefit payments | During the first calendar month or payroll period in which benefits are suspended |
| Diversification Notice | Notice of diversification rights for certain defined contribution plans that hold publicly traded employer securities | Participants, beneficiaries and alternate payees | 30 days in advance of becoming eligible to diversify |

^{*} The DOL does not have an official policy extending the due date for disclosures to the following business day if the date falls on a weekend or holiday.

This summary chart focuses on the most typical reporting and disclosure requirements and is for informational purposes only. It should not be used as a substitute for legal, accounting, actuarial or other professional advice.



^{**}The PBGC waives reporting if the aggregate underfunding of the controlled group's defined benefit plans does not exceed \$15 million.