

2025–2026

Fiduciary Calendar

Dates, deadlines, and other important plan information

As a plan fiduciary, you have a lot to keep track of. This simple calendar displays many of the common tasks and deadlines at a glance for easy reference.

For 3(16) plan sponsors, see the [Fiduciary Guide](#) for additional details.

For a calendar specific to nonqualified plans, see the [Nonqualified Plan Calendar](#). As always, contact your Fidelity Investments® representative for more information and details.



2025

Q3

SEPTEMBER

9/30/25

Required Minimum Distributions (RMDs) service add

This is the deadline to submit new plan additions to the RMD/Autogen service. The plan must be live, with all indicative data and balance data loaded and correct before this date, in order to be included in the Autogen cycle for current year. Any plans going live after this date will be set up for RMD service in Q1 of the following year and included in the next Autogen cycle in the fall of the following year.

9/30/25

Distribute the Summary Annual Report (SAR)

For plans not relying on an extension (Form 5558), this is the deadline to provide the SAR to all beneficiaries, alternate payees, and plan participants, including terminated participants who are receiving or are entitled to receive benefits. You can find the SAR in Plan Sponsor Webstation (PSW®) and send it electronically or by paper. Sending electronically? Visit the Department of Labor (DOL) website for electronic delivery requirements. You can sign up for our Form 5500 service and we'll provide you with a sample report for your review and distribution.

[Non-calendar-year plans should refer to page 6.](#)

2025

Q4 REMINDERS

Thinking about changing your plan design?

Considering a match increase, profit sharing, or nonelective contribution rates? Switching to a safe harbor plan? If you're considering changing your plan design, please remember that many amendments must be made in advance of the effective date and often within the same plan year. If you're using Fidelity's preapproved plan documents, we recommend that you contact your service team 60 days in advance of the effective date or as soon as possible. This time allows for coordination with other projects and operational configurations as well as proper review of the amendments.

Nonqualified plan distribution processing

If your plan is scheduled to pay distributions on 1/1/26, and you use our check and tax service, then we'll temporarily adjust the default setup so that the distributions are processed and dated 1/2/26. Immediately after the first weekend of the new year, the plan's

Distribution of the safe harbor participant notice

If you have a safe harbor plan, the annual safe harbor participant notice must be distributed to all eligible employees at least 30 days, but no more than 90 days, before the beginning of each plan year.

The Setting Every Community Up for Retirement Enhancement (SECURE) Act eliminates the requirement to distribute the initial and annual notice to eligible employees for certain safe harbor nonelective contribution plans. However, the notice is still required if the safe harbor contribution plan formula:

- Is a matching contribution, or
- Includes a discretionary matching contribution, and the employer nonelective contribution is used to help the plan pass the actual contribution percentage nondiscrimination test.

Does your plan meet the new requirements to eliminate the safe harbor notice? If so, consider whether you want to discontinue distributing the notice to eligible employees.

SECURE 2.0 Act Roth Catch-up Roth Catch-up Required (RCR) Indicator Submission

SECURE 2.0 Act of 2022, Section 603 - Roth Catch-up Contribution Provision: As of 1/1/26, employees whose wages (as defined for Social Security FICA wages) from the same employer exceed \$150,000 in the preceding calendar year can only make catch-up contributions on a Roth basis.

The RCR indicator is a new participant-level data element that Fidelity will use to assist plan sponsors in complying with the Roth catch-up requirement.

The RCR needs to be submitted annually after compensation has been finalized for the applicable year for all catch-up-eligible participants. Fidelity will begin accepting the RCR indicator submissions via PSW file upload in December 2025 for calendar year 2026.



Fidelity does not provide legal or tax advice. The information herein is general and educational in nature and should not be considered legal or tax advice. Tax laws and regulations are complex and subject to change, which can materially impact investment results. Fidelity cannot guarantee that the information herein is accurate, complete, or timely. Fidelity makes no warranties with regard to such information or results obtained by its use, and disclaims any liability arising out of your use of, or any tax position taken in reliance on, such information. Consult an attorney or tax professional regarding your specific situation.

2025 Q4

OCTOBER

10/1/25

Reminder about qualified/nonqualified plan documents

If you have any discretionary amendments, don't forget to adopt them by the end of the plan year in which they are effective for your qualified and/or nonqualified plan(s). If you are using Fidelity's preapproved plan documents (Fidelity's Preapproved Plan), you will separately receive more information in 2026 about mandatory amendments, if any, due to any recent legislative and regulatory changes.

10/15/25

Form 5500

Deadline to submit Form 5500 for plans that have an extension to file certain employee returns (Form 5558). If your filing deadline falls on the weekend, it's acceptable to file Form 5500 on the next business day.

Non-calendar-year plans should refer to page 6.

10/31/25

Submit manual processing requests for RMDs by this date to ensure that they get processed by year-end.

**May not be applicable for all plans*

NOVEMBER

11/1/25

Authorization for processing plan corrections

Submit In good order authorization for plan corrections by this date to ensure they get processed by year-end (12/31/25). Common plan correction examples include loan repayments, early payments, or overpayment distribution errors.

11/10/25

Start date for Required Minimum Distributions (RMDs) for plans that utilize the Fidelity Automated Service

The 2025 RMD cycle will begin on or around 11/10/25 through 12/5/25.

De minimis distribution requests

If you have any pending de minimis distribution requests, help us get them processed in the current year by submitting them by this date. If you have a terminated participant and you distribute their vested account balance of less than \$1,000, or if your plan has an automatic IRA rollover provision (dependent on plan level threshold), then the plan participant will need to receive the Special Tax notice.

DECEMBER

12/1/25

Loan default requests

Deadline to submit loan default requests to Fidelity.

Participant forfeitures

Review your terminated participant nonvested account balances and determine if they should be forfeited by this date. We can work with you to establish a recurring forfeiture process throughout the year to make sure these forfeitures are all processed on time.

12/9/25

Reminder of final payroll funding for calendar year-end

Fidelity Year-End Data Collection forms must be submitted by this date if you'd like our help planning for your year-end final payroll contribution for 2025. We'd love to help make your job a little easier. All you have to do is review the form and provide the necessary information to us by this date.

We'll ask you to confirm the date you plan to fund the final contribution file for 2025. This date is set at a plan level. If your plan is divisional, each division will need to finish its 2025 contributions before sending any contributions for the new year.

**Applicable only for plans where Fidelity tracks 402(g).*

12/9/25

Nonqualified plan distribution requests

This is the deadline to send us your nonqualified plan distribution requests. We can't process any nonqualified plan distributions until we get direction from you, so it's important to submit them by this date. If you are not using Fidelity's automated service, you can open a PSW service request to submit them.

Please review your plan's 2025 distributions to make sure all required distributions during the year are paid. There could be serious tax and penalty implications if distributions are made in the wrong year or if distributions are processed in the wrong year, so double-check your plan's 2025 distributions to make sure they've all been properly paid.

12/15/25

Distribute the Summary Annual Report (SAR)

For plans relying on an extension (Form 5558), this is the deadline to provide the SAR to all beneficiaries, alternate payees, and plan participants, including terminated participants who are receiving or are entitled to receive benefits. You can find the SAR in PSW and send it electronically or by paper. If you're sending the report electronically, please visit the DOL website for electronic delivery requirements. You can sign up for our 5500 service, and we'll provide you with a sample report for your review and distribution.

Non-calendar-year plans should refer to page 6.

12/19/25

Reminder to review class year accounting (CYA) contributions

If you have CYA nonqualified plans, review your contributions during year-end payroll to make sure they're applied to the correct class year before you upload the files.

12/23/25 – 12/30/25

Exchanges from Fidelity BrokerageLink® accounts

Exchanges from Fidelity BrokerageLink accounts must be submitted by these dates if they are intended to fund cash withdrawals:

- 12/23/2025 - Exchanges involving sale of stock
- 12/29/2025 - Exchanges involving mutual funds
- 12/30/2025 - Cash from core holdings

12/30/25

Share-accounted and real-time stock fund distributions

Deadline to submit distributions that include share-accounted or real-time (cash or in-kind) stock funds is this date.

12/31/25

Distributions involving unitized stock

The deadline to submit cash or in-kind distributions that include unitized stock shares must be done before market close on this date.

TIP: Submit these distributions to us through a PSW service request.

REMINDER ABOUT PSW® SERVICE REQUESTS

When you open a PSW® service request, choosing the type of request you're submitting and attaching the necessary Excel template helps us assist you more quickly.

➤ **Form 5500**

A qualified defined contribution retirement plan will need to be independently audited before filing the Form 5500 if its participant count (defined as the number of participants with balances in the plan) was 100 or more at the beginning of the plan year for a large filer or if it's a start-up plan with more than 100 participants with plan balances. The 80 - 20 rule applies. If you need to complete the audit, be sure to factor in enough time to choose and hire an independent auditor, plus a minimum of 6 months to complete the process.

➤ **Nonqualified supplemental wage withholding**

Send us data on any supplemental wage payments in which we are not the disbursement agent. We'll help ensure that the supplemental wage payment total for the year is not more than \$1 million. If it is, any payments made after the \$1 million limit will have federal taxes withheld at 37% for the rest of the year.

➤ **Review participant information**

Review the participant data we have on file to make sure everything is correct.

➤ **Best practice for employee contributions and loan repayments**

Employee contributions and loan repayments become plan assets as soon as they can be separated from the employer's assets administratively and no later than 15 business days after the month in which they were deducted from the employee's paycheck. The 15th business day rule is not a safe harbor. The DOL emphasizes that the real deadline is the earliest date on which contributions can be segregated, and it may look to prior payrolls to determine what is possible.

➤ **BrokerageLink® securities**

To comply with the terms of the trust and/or service agreement, please notify us of any security that constitutes an "employer security" or any other plan-imposed "ineligible security," so they can be restricted from purchase within Fidelity BrokerageLink.

➤ It's important to review ineligible securities on a regular basis and to notify us of any changes to ensure they're restricted from purchase. Certain securities within BrokerageLink are deemed ineligible for purchase, including plan-imposed CUSIP or investment-type restrictions. Newly issued employer securities, changes or additions to existing securities due to mergers and acquisitions, or fund lineup changes are all items for review consideration. The person or group that oversees your investments (including employer securities) will typically complete this review.

TIP: Notify us of any changes or additions to ineligible securities through a PSW service request.

➤ **2025 and 2026 contributions**

We need you to monitor and fund 2025 and 2026 contributions separately to make sure we account for them in the correct tax year, so it's a huge help if you can submit them on different files. Another way you can help us account for contributions in the correct tax year is by letting your Fidelity representative know of any contribution files being sent that contain deferrals related to compensation paid in 2025.

JANUARY

1/31/26

Health Savings Account (HSA) tax reporting

Each year in January, Fidelity mails Form 1099-SA to the account holder. If there was a distribution from the Fidelity HSA during the tax year, the IRS requires Fidelity to issue this form.

1/31/26

E-filing IRS Forms W-2, 1099-NEC and 1099-MISC

For plans using Fidelity check and tax service, we'll electronically file W-2 and 1099-NEC forms for your nonqualified plan by 1/31/26.

FEBRUARY

2/1/26

Required Minimum Distributions (RMDs)

Check to see if you have RMD distributions before they're due on 4/1/26.

2/15/26

Average deferral percentage (ADP)/average contribution percentage (ACP) Return of Excess (ROE) contributions

If you *don't* use Fidelity's nondiscrimination testing service and if your plan failed ADP/ACP testing, we will need your authorization to process corrective distributions by this date so we can complete processing by the ROE deadline (3/15/26). If you don't use our nondiscrimination testing service, you can submit your authorization with a PSW service request along with the following information for each participant:

- Name
- Social Security number (SSN)
- Type of excess
- Amount of excess
- Contribution sources

Non-calendar-year plans should refer to page 6.

MARCH

3/1/26

ADP/ACP Return of Excess (ROE) contributions

If you use Fidelity's nondiscrimination testing service and if your plan failed ADP or ACP testing, please submit ROE service requests by this date. ROE service requests can be submitted in the Compliance section of PSW.

Corrections for failed ADP/ACP testing failures need to be processed within 2 1/2 months after the close of the plan year to avoid an excise tax.

Plan year-end reporting packages

We will post plan year-end packages to PSW by this date.

3/15/26

Failed ADP/ACP test distributions

If your plan failed ADP/ACP testing, corrective distributions need to be issued by this date in order to prevent a 10% excise tax on the failure amount.

Non-calendar-year plans should refer to page 6.

3/31/26

Temporary Fidelity Identification Number (TFIN) review

Run and review the TFIN report found in PSW enhanced reporting. Fidelity issues TFINs to allow a participant to be established in your plan until the participant obtains a valid taxpayer identification number (i.e., SSN, ITIN, etc.). TFINs begin with "998" and are restricted to prevent any participant disbursement activity until the correct identification number has been provided.

E-filing IRS Forms 1099-R

For plans using Fidelity check and tax service, we'll electronically file 1099-R by 3/31/26.

2026 Q2 REMINDERS

➤ Best practice for Plan Sponsor review of PSW user access

It's critical that employers actively review PSW user access and make necessary changes when 1 or more of your PSW users moves to a new role or has a change in job responsibilities or leaves your company. In addition, Fidelity prohibits the sharing of PSW credentials across users. It is critical that once a user leaves the company that their PSW credentials are deactivated. To review current access, please visit the User Maintenance section within PSW and select "Review User(s)." Please review the current access for your existing PSW users and take action as needed.

➤ Review and update Special Tax ID records for Puerto Rican participants

Fidelity is required to submit tax information to the IRS and the Puerto Rico Hacienda (Department of Treasury) for distributions taken by participants who earned contributions in U.S. or dual-qualified plans while residents of Puerto Rico. Participants must be coded correctly for Fidelity to generate the correct tax forms.

Use "Balances Report" in PSW enhanced reporting to review the list of participants. Participants with Puerto Rico source income should be flagged as follows:

- US qualified plans – Active participants with Puerto Rico source income should not be in US qualified plans.
- Puerto Rico plans – Active participants should have a Special Tax ID of Q.
- Dual qualified plans – Active participants who have Puerto Rico source income should have a Special Tax ID of P if Fidelity performs check and tax services or Q if Fidelity does not perform check and tax services for the plan.
- Any Special Tax ID updates can be sent to Fidelity using tape spec 01 or manually updated in the participant record in PSW.

APRIL/MAY

4/1/26

402(g) Return of Excess (ROE) distributions

Please submit authorization to process 402(g) ROE distributions through a PSW service request by this date.

4/15/26

HSA contributions

The deadline to fund employee and employer contributions for the 2025 tax year is 4/15/26. Any contributions meant for the 2025 tax year need to be funded by the IRS tax filing deadline. Additionally, 2025 and 2026 contributions can be on the same file upload or electronic data transmission/single client feed, as there is a dedicated field for the tax year. If the preference is to keep the contributions on separate files, that is also an option. Keep in mind, 2026 contributions cannot be processed or funded until the first business day of the new year.

5/31/26

Health Savings Account (HSA) tax reporting

In May, Fidelity mails 5498-SA, which includes contributions from January 1 through December 31 of the previous year as well as previous-year contributions made the following January 1 through April 15.

JUNE

6/15/26

ADP/ACP Return of Excess contributions for certain Eligible Automatic Enrollment Agreement (EACA) plans

If you *don't* use Fidelity's nondiscrimination testing service and if your plan failed ADP/ACP testing, authorization to process corrective distributions is due by this date for us to complete processing by 6/30/26. You can submit your authorization with a PSW service request, along with a copy of the ADP/ACP Required Distribution Report. We'll also need the following information for each participant:

- Name
- Social Security number (SSN)
- Type of excess
- Amount of excess
- Contribution sources

6/30/26

ADP/ACP Return of Excess contributions for certain EACA plans

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- Name
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2026 Q3 REMINDERS

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TIP: Notify us of any changes or additions to ineligible securities through a PSW service request.

JULY/AUGUST

7/31/26

Form 5500

Plans that *don't* have an extension to file certain employee returns (Form 5558). Double-check that you have PSW update access to the Form 5500 page, and then you'll be able to sign and file the form electronically through PSW. If your filing deadline falls on the weekend, it's acceptable to file Form 5500 on the next business day.

TIP: To sign and view electronically, verify that you have the appropriate PSW access permissions for the Form 5500 page.

Form 8955-SSA

This is the deadline to submit Form 8955-SSA for plans that did NOT file an extension (Form 5558) for their Form 5500.

[Non-calendar-year plans should refer to page 6.](#)

SEPTEMBER

9/30/26

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2026

Q4 REMINDERS

➤ Thinking about changing your plan design?

Considering a match increase, profit sharing, or nonelective contribution rates? Changing to a safe harbor plan? Thinking about changing your plan design? If you are considering changing your plan design, please remember that many amendments must be made in advance of the effective date and often within the same plan year.

TIP: If you're using Fidelity's preapproved plan documents, for the best experience, give us a 60-day advance notice of the desired effective date so that we can coordinate with other projects and ready the operational configurations and review of the amendments.

➤ Distribution of the safe harbor participant notice

If you have a safe harbor plan, then an annual safe harbor participant notice must be distributed to all eligible employees at least 30 days but no more than 90 days before the beginning of each plan year.

The SECURE Act eliminates the requirement to distribute the initial and annual safe harbor notice to eligible employees for certain safe harbor nonelective contribution plans. However, the notice is still required if the safe harbor contribution plan formula:

- Is a matching contribution, or
- Includes a discretionary matching contribution and the employer nonelective contribution is used to help the plan pass the actual contribution percentage nondiscrimination test.

Does your plan meet the new requirements to eliminate the safe harbor notice? Consider whether you want to discontinue distributing the notice to eligible employees.

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OCTOBER

10/15/26

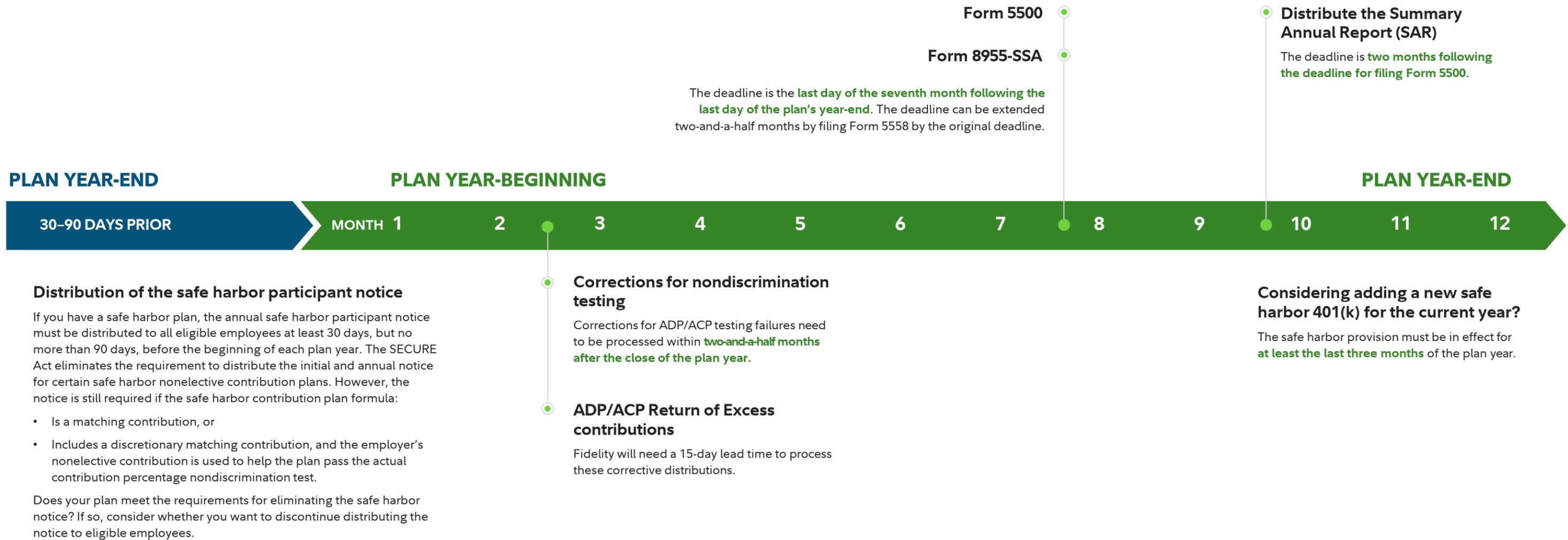
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Non-calendar-year plans should refer to page 6.

Fiduciary Calendar

2025–2026 Non-calendar-year plans



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