3(16) FIDUCIARY SERVICES

Annual Retirement Plan Review

ONL-RBW 401(k) Plan

January 1, 2025 - December 31, 2025

Let Us Guide You

COMPASS-CG.COM

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Before you go any further, we want to say

THANK YOU.

We appreciate your time and attention to this report, your business, and your trust in Compass.

Annual Compliance & Administration Summary

Annual Summary

YOUR ACTION ITEMS

COMPLETED ☐	**Sign Employer Resolution** Employer resolution is required if you made discretionary employer contributions. This is an item that is reviewed during an IRS and/or DOL audit.	If applicable, and you have not already signed this document, we will be sending to you separately for e-signature.
COMPLETED ☐	**Beneficiary Designation** You should encourage all participants to update their beneficiary on your record keeper's website. If the record keeper can not maintain the beneficiary information you should retain a completed beneficiary form for all participants for your records. While Compass is happy to also retain a copy in our files, we cannot be responsible for ensuring that a form has been completed by all participants. Ultimately, it is important that your files be up to date in the event a participant becomes deceased.	Plan sponsors should conduct periodic re-solicitation of beneficiary designation forms for their participants.

YOUR ONGOING RESPONSIBILITIES

COMPLETED ☐	**Definition of Compensation** The definition(s) of compensation for your plan can be viewed in your Adoption Agreement. The correct definition(s) must be used for elective deferrals, calculation of employer contributions, and testing purposes.	Please review with your payroll company that the correct definition of compensation as per your plan document is being used for Plan purposes.
COMPLETED ☐	**Your Ongoing Responsibilities** Please review and monitor your payroll each year in regards to your Plan rules. Please see the Payroll Responsibilities sheet in this valuation report for more details.	Please see the Payroll Responsibilities sheet in this valuation report for more details.

Annual Summary

COMPLIANCE & ADMINISTRATION SUMMARY

COMPLETED	**Review ADP/ ACP Testing** The ADP test compares elective deferrals of the HCE (Highly Compensated Employees) vs the NHCE (Non Highly Compensated Employees). The ACP test compares the company match of the HCE vs the NHCE.	Not applicable due to safe harbor status.
COMPLETED	**Top Heavy** If 60% of the assets in the plan belong to key employees, the plan is considered top heavy which may require a minimum contribution of up to 3% to non-key employees. Special rules may apply.	☐ Satisfied by Safe Harbor ☐ >60%: Plan is Top Heavy ☐ >50% but <60%: On Watch ■ <50%: Not Top Heavy
COMPLETED	**Plan Audit** Plans that have more than 100 participants with account balances are required to engage an independent auditor. Special rules may apply.	☐ Audited ☐ On Watch ■ Not Required
COMPLETED	**Coverage Testing** The Coverage Test ensures the plan is benefitting enough of the NHCE's (Non Highly Compensated Employees).	The coverage test passes.
COMPLETED	**ERISA Fidelity Bond** The IRS requires a bond coverage amount of 10% of plan assets (maximum $500,000).	Compass maintains the ERISA bond on your behalf unless you have instructed us otherwise. If we are not currently maintaining this for you, please review your coverage.
COMPLETED	**Annual Form 8955-SSA** The Form 8955-SSA must be filed no later than 7 months after the end of the plan year, or 10.5 months after the end of the plan year, if on extension.	Compass has/will file the Form 8955-SSA electronically on your behalf.
COMPLETED	**Sign & File Form 5500** The Form 5500 and related schedules must be filed no later than 7 months after the end of the plan year, or 10.5 months after the end of the plan year, if on extension.	As your 3(16) fiduciary, Compass has signed and filed your Form 5500.

Annual Summary

COMPLIANCE & ADMINISTRATION SUMMARY (cont.)

COMPLETED	Employer Contributions	
☑	**Employer Contributions** Below identifies any Employer contributions to your plan for the prior plan year. **Safe Harbor** $ 63,204	Employer contributions must be deposited by the due date of your business tax return, including extensions. You must use any Forfeiture Account money available in your plan each year. Please apply this Forfeiture Account money to any employer contributions or plan administration costs.

ONL-RBW 401(k) Plan
Summary of Test Results
12/31/2025

Limits Test:	**PASS**
415 Excess:	PASS
402(g) Excess:	PASS
Plan Limit Excess:	PASS

410(b) Ratio Percentage Test:	**PASS**
Elective Deferrals:	PASS
Match:	PASS
Non-Elective:	PASS

Deduction Limit:	**PASS**

General Test:	**PASS**
Rate Group Test (at 70%):	PASS
Gateway Test:	PASS

Top Heavy Test:	**Not Top Heavy**
Top Heavy Percentage:	0.0000

Financial Statements

Financial Statement

ONL-RBW 401(K) PLAN

For the plan year 01/01/2025 through 12/31/2025

Income and Expenses

Beginning Balance January 1, 2025		**$ 642,746.54**
Income		
2025 Pretax Contribution	$ 84,185.14	
2025 Roth Contribution	$ 4,706.87	
2025 Safe Harbor Employer Match Contribution	$ 63,203.74	
Transfer In/Out	$ 55,311.27	
Forfeiture Adjustment	$ 298.77	
Loan Interest	$ 287.71	
Investment Gain/Loss	$ 111,613.34	
Total Income		$ 319,606.84
Expenses		
Plan Fees	$ (6,703.60)	
Participant Withdrawals/Distributions	$ (112,424.10)	
Total Expenses		$ (119,127.70)
Ending Balance December 31, 2025		**$ 843,225.68**

Assets and Liabilities

Plan Assets		
2025 Pretax Contribution Excess	$ (3,242.64)	
2025 Roth Contribution Excess	$ (251.96)	
2025 Safe Harbor Match Contribution Excess	$ (5,738.50)	
John Hancock Loan Fund	$ 7,889.15	
John Hancock Forfeiture Account	$ 351.66	
John Hancock Participant Accounts	$ 844,217.97	
Total Assets		**$ 843,225.68**
Liabilities and Reserve for Participants		
Reserve For Participants	$ 843,225.68	
Total Liabilities and Reserve for Participants		**$ 843,225.68**

Plan Provisions, Highlights & Specifications

ONL-RBW 401(K) PLAN
PLAN HIGHLIGHTS

IMPORTANT: *This is a summary of the plan features. For full details, please refer to the Summary Plan Description.*

Eligibility	
Excluded Employees:	You are excluded from the Plan if you are a member of any of the following classes of employees: • Residents of Puerto Rico, for purposes of Elective Deferral Contributions, Safe Harbor Matching Contributions and Non-Elective Contributions.
Elective Deferral Contributions, Safe Harbor Matching Contributions and Non-Elective Contributions:	You must meet the following criteria to become eligible to participate in the Plan: • Attain age 21
Elective Deferral Contributions, Safe Harbor Matching Contributions and Non-Elective Contributions:	You will enter the Plan on the date you meet the eligibility criteria specified above.
Contributions	
Elective Deferral:	You may elect to defer up to 100% of your Plan Compensation on a pre-tax basis. You may also elect to make Roth contributions to the Plan on an after-tax basis. You may elect to change your elections to contribute to the Plan as of each pay period. Federal law also limits the amount you may elect to defer under the Plan ($24,500 in 2026). However, if you are age 50 or over, you may defer an additional amount up to $8,000 (in 2026). If you are between the ages of 60 - 63 as of the end of the calendar year, you may be able to defer an additional amount, increasing your catch-up limit to the "enhanced catch-up limit" of up to $11,250 (for 2026). These dollar limits are indexed; therefore, they may increase each year for cost-of-living adjustments.
Safe Harbor Matching Contributions:	The Employer will contribute a matching contribution to your Safe Harbor Matching Contribution Account in an amount equal to 100% of the Matched Employee Contributions that are not in excess of 4% of your Plan Compensation. Matching contributions will be allocated to the Safe Harbor Matching Contribution Accounts of Participants as soon as administratively feasible after the end of each pay period.
Non-Elective Contributions:	The Employer may, in its sole discretion, make a Non-Elective Contribution on your behalf in an amount determined by the Employer. Such contribution, if made, will be allocated in an amount designated by the Employer to be allocated to similarly situated eligible Participants. You must complete at least 1,000 hours of service during the Applicable Period and be employed by the Employer on the last day of the Applicable Period in order to receive a Non-Elective Contribution. For purposes of this section, the Applicable Period for determining satisfaction of service requirements for an allocation of Non-Elective Contributions will be each Plan Year.
Rollovers:	The Plan may accept a Rollover Contribution made on behalf of any Employee not excluded from the Plan, regardless of whether such Employee has met the age and service requirements of the Plan.
Vesting	
Fully Vested Accounts:	You will have a fully vested and nonforfeitable interest in your Elective Deferral Account, Rollover Contribution Account and Safe Harbor Matching Contribution Account.
Non-Elective Contributions:	Your Non-Elective Contribution Account is subject to a 2-6 year graded vesting schedule (20% per year starting with two years of vesting service).

Investing Plan Contributions	
Investments:	You may direct the investment of all of your Accounts in one or more of the available Investment Funds. Your elections will be subject to such rules and limitations as the Plan Administrator may prescribe. The Plan Administrator may restrict investment transfers to the extent required to comply with applicable law. The Plan is intended to constitute a plan described in section 404(c) of ERISA. This means that Plan fiduciaries may be relieved of liability for any of your losses that are the result of your investment elections.
Distributions and Loans	
Distributions from the plan:	You may receive a distribution from your account under the following circumstances: • Immediately after your employment terminates • Normal Retirement Age (even if you are still working) • Hardship • After age 59.5 • From the Rollover Contribution Account at any time • Death
Loans:	The minimum loan amount is $1,000 and the maximum number of loans outstanding is 1. Please see your Loan Procedures for additional details on taking a loan from the Plan.

Contact Information

Plan Administrator:
Name: Compass 360, LLC

Plan Sponsor Contact Information:
Address: 130 Interstate Blvd., Suite 1, Monroe Township, NJ 08831
Phone number: 706-724-0106
Employer Identification Number: 46-4340799

Plan Administrator Contact Information:
Address: 118 Portsmouth Avenue Suite D201, Stratham, NH 03885
Phone number: 603-778-9920

Note: These plan highlights are intended to be a very concise overview of plan features. For a detailed description of plan features, please review the Summary Plan Description or contact the Plan Administrator for more information. The plan features described in these plan highlights are subject to change and in the event of a discrepancy between the legal plan document and these highlights (or any other summary of plan features), the plan document shall control.

Industry News

COMPLIANCE ALERT

ROTH CATCH-UP RULES AND GUIDANCE

While the new Roth Catch-Up Rules take effect on January 1, 2026, the IRS has indicated that final regulations will not be released until 2027. All Plan Sponsors must make a "good faith" effort to comply until final regulations are released. Based on the available information, Compass has summarized the options and provided our guidance below.

Please note that there is no one-size-fits-all option for this regulation. Please ask your plan Recordkeeper and your payroll company how they are handling the change and what their capabilities are.

Communication is key! You are required to provide notice to affected plan participants and to adopt administrative procedures.

Plan Sponsors have two options regarding Roth catch-up contributions; you are required to select one and inform your participants annually.

Participant Election:

- Requires that participants actively choose to make catch-up contributions. Otherwise, their deferrals are shut off once they reach the normal limit (so effectively no catch-up).
- The only correction for catch-up errors is to refund this money to the participant.

Deemed Election:

- With this method, the plan sponsor is deeming that the participant elected Roth even if they did not.
- Corrections can include an in-plan Roth conversion or a payroll update. (However, a W-2 correction is only permitted if the error is caught before the participant's W-2 is issued.)

Compass is recommending the deemed election method for Roth catch-up contributions. This approach helps ensure that participants won't miss out on catch-up opportunities simply because they forgot to make a selection. We believe the deemed election provides the smoothest experience for both plan sponsors and participants, reducing complexity and helping everyone stay compliant with the new rules.

QUICK EXPLANATION

If a plan participant is over the age of 50 and made over $150,000 in FICA wages the prior year (indexed annually), this participant will only be allowed to make catch-up contributions to the Roth Source.

Participants meeting this criterion are considered "Highly Paid Individuals" (HPIs). Compass and your Recordkeeper need you to identify the HPIs in your plan. This is a new data collection point that Recordkeepers and TPAs will require annually.

The total compensation of $150,000 is calculated based on the amount reported in Box 3 (Social Security Wages) of last year's Form W-2 from a single employer.

Other Notes:

- Correction rules include a $250 de minimis threshold—errors below this amount are considered minor and may not need fixing.
- You do not need to formally amend your plan to use the deemed Roth catch-up method at this time. Formal plan amendments will be required later, once updated prototype documents become available.
- Continue to monitor for further guidance and consult with your Recordkeeper for the latest information.

COLA:
COST-OF-LIVING ADJUSTMENTS 2026

These Compass-created, easy-to-follow charts provide the latest Cost-of-Living Adjustments (COLAs) for 2026 versus prior years. These limits are provided each year by the Internal Revenue Service and become effective January 1, 2026.

MAXIMIZING DOLLAR LIMITATIONS

Employee Deferral Limits	2026	2025	2024
401(k) Contribution	$24,500	$23,500	$23,000
403(b) Contribution	$24,500	$23,500	$23,000
457 Contribution	$24,500	$23,500	$23,000
SIMPLE 401(k)/IRA	$17,000	$16,500	$16,000

Employee Catch-Up Limits	2026	2025	2024
401(k), 403(b), 457	$8,000	$7,500	$7,500
Individuals who turn age 60-63 in 2026	$11,250	$11,250	N/A
SIMPLE 401(k)/IRA	$4,000	$3,500	$3,500
Roth Catch-Up FICA Wage Threshold	$150,000	N/A	N/A

Social Security Taxable Wage Bases	2026	2025	2024
Social Security	$183,600	$176,100	$168,600
Medicare	No Limit	No Limit	No Limit

Other Plan Limitations	2026	2025	2024
Annual Compensation Limit	$360,000	$350,000	$345,000
Defined Benefit Plan Maximum Benefit	$290,000	$280,000	$275,000
Defined Contribution Plan Maximum Contribution Limit	$72,000	$70,000	$69,000
Highly Compensated Employees' Threshold	$160,000	$160,000	$155,000
Key Employee (Officer) Compensation Threshold	$235,000	$230,000	$220,000

LEARN MORE

Find additional helpful resources at **compass-cg.com/resources.**

CLIENT PAYROLL SUBMISSIONS RESPONSIBILITIES

As per our payroll training call, your payroll responsibilities for a successful partnership are:

- We have "view only" access to your payroll so we cannot make changes to your payroll. Deferral changes and loan payment setup will have to be made by you.
- If you have a special bonus or commission payroll that is off schedule, you Must Notify your Compass360 payroll specialist before that payroll.
- 401(k) deductions should be withheld from bonuses and commissions. If your plan has operated differently, please notify us so that we may provide Opt Out Forms.
- If your payroll company is calculating your employer contribution, please be sure they are using the correct definition of compensation that we have identified for you as per your plan document.
- We submit your 401(k) contributions to the record keeper via ACH and email you confirmation, but it is your responsibility to make sure the funds are withdrawn from your bank account. We do not have access to match your bank account to the ACH submission.
- Certain payroll companies do not withhold 401(k) on payments made after a participant terminates, so the participant's final payroll may not include a 401(k) deduction. When a participant terminates, please review your final payroll for this participant before submitting.
- The payroll reports we require must be in our format with all current employees (not just those participating in the 401(k) plan). In rare cases, employees in excluded classes (such as Union) should be identified and marked in column T on the spreadsheet format which we reviewed with you.
- We have reviewed your plan's deferral change dates with you. We will send you changes recorded on the record keeper's website on a per payroll period basis. Please update the changes in payroll in accordance with your plan's deferral change dates.
- Please be sure participants go on the record keeper website to make deferral changes. The deferral elections with the record keeper must match your payroll system.

If you would like to discuss any of this information in more detail, please let us know and we will arrange an additional call with your plan administrator and payroll specialist.

COMPARING TRADITIONAL TPA SERVICES TO 3(16) SERVICES

ROLES AND RESPONSIBILITIES

As your Third Party Administrator, Compass works hard(er) to make your job easier. But when you are enrolled in our 3(16) Services, that's when you benefit from our full-scope 3(16) Fiduciary services. We are often asked to spell out the differences, so we've listed Key Points here based on our most frequently asked questions. (And see our Quick-Reference Chart on the next page.)

Key Points for Standard Third Party Administration Services:

Submitting Payroll Contributions: You or your payroll company are responsible for submitting and approving payroll contributions to your investment platform in a timely manner. There are many payroll companies and software service providers that can automate this process. With our 3(16) Services, we do this for you.

New Employee Data: You are responsible for uploading to or entering new employee data to your investment platforms' online system. With our 3(16) Services, Compass will do this for you provided we receive the data from you or your payroll company.

Deferral Changes and Loan Repayments: You are responsible for updating your payroll based on Participant requests. Your investment platform will provide you with frequent reports indicating the changes requested by your Participants. It is your responsibility to learn how to access these reports from your investment platform. With our 3(16) Services, we proactively send you reports indicating necessary changes and updates for your Payroll System.

Providing Annual Employee Census Data & Payroll Records: You are responsible for providing this annual information to Compass. With our 3(16) Services, we may be able to download Employee Data directly from your payroll. Currently only a few Payroll Companies allow this.

Force Outs for Terminated Participants: You are responsible for completing and mailing the required forms and letters to the terminated participants. With our 3(16) Services, we do this for you.

Annual Notices: You are responsible for Distributing these items to each participant (including any Terminated participants with assets remaining in your plan). With our 3(16) Services, we do this for you.

Eligibility Tracking: You are responsible for determining when a new employee is eligible to join your plan. Many investment platforms now offer online services to track this and proactively remind you and your employee. With our 3(16) Services, we can track eligibility for you (minimum 3 months of service with Monthly Entry required).

Enrollment Materials to New Participants: You are responsible for distributing the Enrollment materials and Disclosure Notices to newly eligible participants. With our 3(16) Services, we can track eligibility for you (minimum 3 months of service with Monthly Entry required).

Enrollments: While most enrollments are now Online through the investment platform's website, any paper forms received must be sent directly to your investment platform or entered into the website by you. With our 3(16) Services, we do this for you.

Beneficiary Forms: You are responsible for keeping a copy in your personnel files. Compass does not retain copies. Many investment platforms now offer online Beneficiary tracking through their website.

Signing Form 5500: You must ensure that you, the Plan Sponsor, properly signs your Form 5500 each year. With our 3(16) Services, Compass will sign the Form 5500 as your fiduciary.

ERISA Fidelity Bond: You are responsible for purchasing and updating your Bond. With our 3(16) Services, we do this for you.

Compass 3(16) Services vs. Traditional Services: A Quick-Reference Chart

PLAN SET-UP & SERVICES	3(16)	Traditional
Design plan and related meetings/correspondence	●	●
Named Fiduciary under ERISA 3(16)	●	
Named as Plan Administrator and 402(a) Fiduciary in Plan Document	●	
Provide Plan Documents and Summary Plan Description	●	●
Provide detailed report on Plan Provisions to Recordkeeper	●	●
Coordinate electronic contributions process with Payroll and Plan Sponsor	●	
Provide information regarding fidelity bond	●	●
Purchase and maintain fidelity bond	●	
Provide ongoing document updates when required by IRS	●	●
ADMINISTRATION & COMPLIANCE		
Submit payroll contributions to RecordKeeper	●	
Provide deposit confirmations	●	
Mail and email Annual Notices directly to all Plan Participants	●	
Input new hire employee data to Recordkeeper	●	
Eligibility Determination and Tracking (minimum eligibility required)	●	
Send enrollment material directly to newly eligible participants	●	
Manage process for Small Amount Force Outs of Terminated Participants	●	
Provide full sign-off and processing of Loans and Distributions	●	
Plan Sponsor provides final Distribution and Loan approval		●
Hardship determination and full sign-off	●	
Plan Sponsor determines and signs off on Hardships		●
Annual Compliance Testing	●	●

Compass 3(16) Services vs. Traditional Services: A Quick-Reference Chart (cont.)

ADMINISTRATION & COMPLIANCE (CONT.)	3(16)	Traditional
Validate/reconcile contributions by money source and type annually	●	●
Calculate Vesting	●	●
Prepare Form 5500 package	●	●
Sign and file Form 5500 package	●	
Prepare consolidated Audit Package for Form 5500 (if applicable)	●	●
Value and summarize plan annually	●	●
Provide Summary Annual Report	●	●
EDUCATION & ONGOING COMMUNICATION		
Annual Fiduciary Review	●	
Educational Webinars, Articles, and Video Series	●	●

COMPASS
3(16)

118 PORTSMOUTH AVENUE
SUITE D201
STRATHAM, NH 03885

OFFICE: 603.778.9920
FAX 866.674.2672

COMPASS-CG.COM