

Bindery Industry Employers GCC/IBT Pension Plan
EIN: 23-6209755 PN: 001
Application for Special Financial Assistance

Section D, Item 1 – Cover Letter

February 28, 2023

To: Pension Benefit Guaranty Corporation (PBGC)
445 12th Street SW
Washington, DC 20024-2101

Re: Special Financial Assistance Application for Bindery Industry Employers GCC/IBT Pension Plan

Please find enclosed an application for \$22,967,100 as of November 30, 2022 in Special Financial Assistance (SFA) as provided by the American Rescue Plan Act (ARPA) of 2021 for the Bindery Industry Employers GCC/IBT Pension Plan (“Bindery Pension Plan” or “Plan”). This application has been completed in good faith based on our understanding of ARPA and the PBGC’s Final Rule effective August 8, 2022.

Based on a SFA Measurement Date of November 30, 2022, participant census data as of January 1, 2022, and the actuarial assumptions, the plan actuary projected that this amount of aid will keep the plan solvent until 2052. This Plan became insolvent in April 2020. Since it became insolvent in that month, it belongs to Priority Group 1.

As of this date, the Plan has received \$4,125,100 in loans from PBGC. Therefore, the total financial assistance is \$22,967,100, of which \$18,842,000 is payable to the Plan, if approved.

Upon the Plan’s receipt of the SFA, the Plan’s accrued benefit will be restored to the \$14.00 per month benefit level that prevailed before the Plan became insolvent. Therefore, lump sum payments of approximately \$99,581 are added to the projected benefit payments to be paid in 2023, and this is reflected in the \$18,842,000 SFA calculation.

We appreciate your consideration of this request. Please contact me if you have any questions regarding this application.



Cynthia A. Swartz, (CEBs)

Plan Administrator
rGa/RAE Group LLC
601 Dresher Road, Suite 201
Horsham, PA 19044
cindy.swartz@rae-consulting.net

Application for Special Financial Assistance
Bindery Industry Employers GCC/IBT Pension Plan
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Section D, Item 2 - Contact Information for Plan Sponsor and other Authorized Representatives

Plan Sponsor Information

Plan Sponsor Information

Board of Trustees of
Bindery Industry Employers GCC/IBT Pension Plan
rGa/ RAE Group LLC
601 Dresher Road, Suite 201
Horsham, PA 19044
cindy.swartz@rae-consulting.net
(215) 773-0900

Authorized Trustee

John Potts
GCC/IBT Local 14-M
3460 N. Delaware Avenue, Ste. 300
Philadelphia, PA 19134
johnfp2@yahoo.com
(215) 739-3190

Plan's Authorized Representatives

Actuary

Ronald C. Stokes, FSA
Enrolled Actuary No. 20-05287
rGa/ RAE Group LLC
601 Dresher Road, Suite 201
Horsham, PA 19044
ron.stokes@rae-consulting.net
(215) 773-0900

Boris Vaynblat, FSA
Enrolled Actuary No. 20-07445
RAE Group LLC
601 Dresher Road, Suite 201
Horsham, PA 19044
boris@rae-consulting.net
(215) 773-0900

Legal Counsel

Stephen C. Richman, Esq.
Markowitz & Richman
123 S. Broad Street, Suite 2020
Philadelphia, PA 19109
srichman@markowitzandrichman.com
(215) 875-3114

Plan Administrator

Cynthia A. Swartz, CEBS
rGa/ RAE Group LLC
601 Dresher Road, Suite 201
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(215) 773-0900

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Section D, Item 3 – Eligibility Criteria

Explanation of Eligibility for Special Financial Assistance

The Plan satisfies SFA Eligibility based on §4262.3(a)(1) using the zone status certification for the plan year beginning January 1, 2020, which certified the Plan to be in Critical and Declining status. The plan became insolvent on April 1, 2020, also satisfying eligibility under §4262.3(a)(4).

The information required per Section B, Item (5) of the SFA Filing Instructions is included with the attached certification.

The information per Section E, Item (2) does not apply to this application since a zone status certification completed prior to January 1, 2021 is used for the SFA Eligibility determination.

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Section D, Item 4 – Priority Group Identification

The Plan is in Priority Group 1, as defined in Section 4262.10(d)(2) of the PBGC's Final Rule effective August 8, 2022. The Plan became insolvent per section 4245 of ERISA on April 1, 2020, which is prior to March 11, 2022.

Section D, Item 5 – Narrative Description of Future Contributions and Withdrawal Liability Payments

Regular Contributions

Annual contributions from the one remaining employer are assumed to remain flat throughout the SFA coverage period at \$33,346. This is based on a contribution rate of \$6.55 per shift and CBU's equal to 5,091 projected shifts per year. There are no current, nor projected reciprocity agreements with any other locals. The contribution rate is based on the latest Collective Bargaining Agreement, dated January 1, 2021, which does not contain any future negotiated increases. The number of CBUs are projected from the shifts worked in 2022.

Due to the withdrawal of LSC Communications/National Publishing Company on 12/31/2019, the estimated 5,000 CBUs from the 2020 Zone Certification are slightly lower than they are currently, hence the change in assumption moving forward. These assumptions comply with the "acceptable changes" approach in the PBGC's guidance, as they relate to CBU and contribution rate assumptions.

Withdrawal Liability

In late 2019, LSC Communications/National Publishing Company (LSC) withdrew from the Plan. A withdrawal liability of \$10,611,992 was assessed; however, LSC filed for bankruptcy. A settlement was recently reached, and the employer paid a settled withdrawal liability amount of \$87,946 in early 2023.

We have assumed there will be no future withdrawal liability assessments for the one remaining employer in the Plan.

Please see Template 8 for year-by-year breakdowns of the items listed above.

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Section D, Item 6 – Assumption Information
General Assumptions and Justifications

Administrative Expenses Assumption: 2023 & 2024

The assumed administrative expenses for 2020 IRS zone certification purposes was \$125,000. The administrative expense assumption for SFA application purposes was updated based on more recent experience and the Plan moving from insolvent to solvent status upon approval of the SFA application, as explained below.

Audited administrative expenses were \$168,000 in 2020 and \$118,000 in 2021. Unaudited expenses in 2022 were \$112,000. Actual expenses in 2020-2021 included significant legal fees from the withdrawal and bankruptcy of National Publishing Corporation, which reached a settlement with the Plan in early 2023. These high legal expenses are not expected to recur and therefore 2022 actual (unaudited) expenses were used as the basis for the assumed 2023 expenses. Additionally, the Plan has been insolvent since April 2020 and has not been subject to PBGC premiums. PBGC premiums will start being paid if the Plan is approved for SFA.

For SFA filing purposes, the assumed 2023 expenses are approximately \$188,000. This assumption is based on the 2022 actual expenses of \$112,000, increased by a 2.5% inflation assumption and then increased by estimated PBGC 2023 premiums of about \$23,000 and one-time ARPA estimated application fees of \$50,000. The ARPA application fees are assumed to be paid by the Fund in 2023 once the aid is received.

For SFA filing purposes, the assumed 2024 expenses are approximately \$141,000. Administrative expenses in 2024 are assumed to decline because the ARPA fee is non-recurring; however, the decrease will be partially offset by the 2.5% inflation (i.e., increases in other fees/expenses). PBGC premiums in 2024 are expected to be about the same as in 2023 as a result of higher per person premiums and a projected reduction in participant counts.

Inflation Assumption, for Administrative Expenses

The 2020 zone certification did not reflect an inflation assumption because the Plan was expected to become insolvent in that year. For SFA application purposes, a 2.5% annual inflation assumption is reflected on assumed administrative expenses. With a 30-year forecast required for SFA application purposes, a long-term inflation assumption is now justified. The 30-year and 20-year averages of CPI-U increases through 2022 are 2.49% and 2.48%, respectively. Additionally, the Horizon Actuarial 2022 Survey of Capital Market Assumptions shows a 20-year (geometric average) inflation assumption of 2.44%, which reflects responses from 24 survey participants.

Additionally, the Plan will start paying PBGC premiums if and when the SFA aid is approved, whereas the Plan does not currently pay PBGC premiums because it is insolvent. In accordance with American Rescue Plan Act of 2021, PBGC premiums are scheduled to increase by the National Average Wage Index until 2030 and then to \$52 per participant in 2031. For SFA application purposes, PBGC premiums were assumed to increase 2.5% per year until 2030, then

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to \$52 per participant in 2031, and then by 2.5% per year thereafter. PBGC premiums payments are based on the number of projected plan participants in each future year.

The 15% cap on projected administrative expenses as a percentage of projected annual benefit payments, as outlined in PBGC's SFA Assumption Guidance, is not a reasonable limitation on this Plan's administrative expenses. The Plan is expected to have declining benefit payments and a declining plan population, given that there is just one active contributing employer. However, while the Plan is expected to have a declining participant population, most of the Plan's administrative fees (i.e., actuarial, auditing, administrative, legal) are not directly related to or are independent from the number of plan participants and are therefore not expected to decline.

New Entrant Profile Assumption

For the 2020 zone certification, the normal cost and demographics of the active group were assumed to remain the same (i.e., terminations were replaced with new hires). The new active entrants were not assumed to create any benefit payments; this precision was not necessary given that the Plan was projected to become insolvent during 2020.

With SFA application requiring a 30-year forecast and PBGC providing specific guidance on new entrant assumptions, a more refined assumption on new entrants and their resulting benefit payments was used in this application. Please note that there is only one remaining contributing employer in the Plan.

The active participant population was 23 as of January 1, 2022, with all participants employed at the one remaining employer. There were 11 total new hires by this one employer in the five years preceding the Plan's SFA measurement date. One of these 11 new hires was female; therefore, future new entrants are assumed to be 90% male. Based on the actual hire ages, 46% of these 11 new entrants were assumed to be age 22 at hire, 36% were assumed to be age 45 at hire and the remaining 18% were assumed to be age 61 at hire. The use of age bands of 10 years or less, as outlined in PBGC's SFA Assumption Guidance, was not reasonable for this Plan due to the small number of actives and projected new entrants.

Contribution Base Units Assumption

The Contribution Base Units assumption in the 2020 IRS zone certification was 5,000 shifts per year. The Contribution Base Units assumption for this SFA application is 5,091 shifts per year, which is based on actual 2022 experience.

In accordance with PBGC's SFA Assumption Guidance, "PBGC will accept a change in the CBU assumption for the post-certification projection years if the number of assumed CBUs for such years is the same or no less than the number assumed for the last full plan year for which a CBU assumption was utilized in the pre-2021 certification."

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Section E, Item (5) - Checklist Item 33.a.

Certification by Plan's Enrolled Actuary Certifying SFA Amount

This is a certification by the plan's enrolled actuary that the requested amount of SFA is the amount to which the plan is entitled under section 4262(j)(1) of ERISA and §4262.4 of PBGC's SFA regulation.

- (i) I hereby certify that the Bindery Industry Employers GCC/IBT Pension Plan is entitled to the requested \$18,842,000 of SFA aid under ARPA as of November 30, 2022. Additionally, the Plan has received \$4,125,100 in loans from the PBGC as of November 30, 2022. Therefore, the total amount of SFA aid is \$22,967,100.
- (ii) The SFA amount is calculated using participant data from the January 1, 2022 actuarial valuation, as provided by the Fund Administrator, an SFA measurement date of November 30, 2022, and the fair market value of assets as of the SFA measurement date as provided by US Bank. The assumption and methods used are generally those used for the January 1, 2020 actuarial certification of zone status, which is included with this application, with the exception of a few assumption changes (e.g. administrative expenses, contribution base units, and new entrants) as outlined in Template 7.
- (iii) I certify the calculation of the SFA aid has been prepared in accordance with generally accepted actuarial principles and practices. As the plan actuary for this pension plan, I am qualified to render this actuarial opinion and have no conflicts of interest that may impair the objectivity of my work. I further certify that I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.

Ronald C. Stokes

Ronald C. Stokes, FSA, EA, MAAA
Plan Actuary
Enrolled Actuary 20-05287
RAE Group LLC
601 Dresher Road, Suite 201
Horsham, PA 19044
ron.stokes@rae-consulting.net

Bindery Industry Employers GCC/IBT Pension Plan

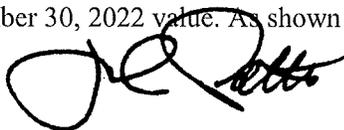
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Application for Special Financial Assistance

Section E, Item (6) - Checklist #34

Fair Market Value Certification

On behalf of the Board of Trustees of the Bindery Industry Pension Plan, I hereby certify that the Fund's fair market value of assets as of November 30, 2022 ("SFA Measurement Date") is \$238,382, and I further certify that this amount is accurate. Enclosed in this document is the US Bank statement as of November 30, 2022. Section B, Item (6) of this application also includes the December 31, 2021 audited financial statements. Shown below is the reconciliation of market value of assets from the audited December 31, 2021 value to the November 30, 2022 value. As shown below, the November 30, 2022 value excludes accrued interest of \$704.



2/28/2023

John Potts
Authorized Trustee

Date

Audited Market Value 12/31/2021	\$	438,628
Receivables		(3,068)
Prepaid Assets		(1,064)
Accrued Expenses		22,302
Investments at Fair Value 12/31/2021	\$	456,798

Income: 1/1/2022-11/30/2022

Employer Contributions	\$	30,575
PBGC Funding		1,003,000
Dividends & Interest		2,565
Income		65
Total Income	\$	1,036,205

Expenses: 1/1/2022-11/30/2022

Benefit payments	\$	1,145,789
Trustee Fees (US BANK)		8,898
Admin/Actuarial fees		68,625
Insurance		7,223
Accounting		12,500
Legal		8,680
Storage Maintenance & Admin Expenses		2,906
Total expense	\$	1,254,621

Net Income	\$	(218,416)
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Invested Assets 11/30/2022	\$	238,382
[used for SFA application purposes]		

Accrued Income	\$	704
Market Value 11/30/2022 [US Bank Statement]	\$	239,086

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN

Amendment 2023-1

Background

1. The Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan (the "Board") has applied to the Pension Benefit Guaranty Corporation ("PBGC") under section 4262 of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), and 29 C.F.R. § 4262 for special financial assistance for the Bindery Industry Employers GCC/IBT Pension Plan (the "Plan").
2. 29 C.F.R. § 4262.6(e)(1) requires that the plan sponsor of a plan applying for special financial assistance amend the written instrument governing the plan to require that the plan be administered in accordance with the restrictions and conditions specified in section 4262 of ERISA and 29 C.F.R. part 4262 and that the amendment be contingent upon approval by PBGC of the plan's application for special financial assistance.
3. Under Article X, Section 10.1 of the Bindery Industry Employers GCC/IBT Pension Plan, Amended and Restated as of January 1, 2014 (the "Plan Document"), the Board has the power to amend the Plan Document.

Amendment

The Plan Document is amended by adding a new Article XVI to read as follows:

Article XVI "American Rescue Plan Act Provisions"

Section 16.1 Administration in Accordance with ARPA

"Beginning with the SFA measurement date selected by the Plan in the Plan's application for special financial assistance, notwithstanding anything to the contrary in this or any other document governing the Plan, the Plan shall be administered in accordance with the restrictions and conditions specified in section 4262 of ERISA and 29 CFR part 4262. This amendment is contingent upon approval by PBGC of the Plan's application for special financial assistance."

IN WITNESS THEREOF, the Trustees hereby execute this Amendment 2023-1 as of the 28 day of February, 2023.

FOR THE UNION



John Potts
Trustee

FOR THE EMPLOYER



R. David Salter
Trustee

Bindery Industry Employers GCC/IBT Pension Plan
EIN: 23-6209755 PN: 001
Application for Special Financial Assistance
Section E, Item (10) - Checklist #38

Penalty of Perjury Statement *(Pursuant to PBGC Regulation §4262.6(b)(2))*

Under penalty of perjury under the laws of the United States of America, I declare that I am an authorized trustee who is a current member of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and that I have examined this Application, including accompanying documents, and, to the best of my knowledge and belief, the Application contains all the relevant facts relating to the Application, all statements of fact contained in the Application are true, correct, and not misleading because of omission of any material fact; and all accompanying documents are what they purport to be.



John Potts
Authorized Trustee

2/28/2023

Date

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

APPLICATION CHECKLIST

Do NOT use this Application Checklist for a supplemented application. Instead use Application Checklist - Supplemented.

Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

-----Filers provide responses here for each Checklist Item:-----

Unless otherwise specified:
YYYY = plan year
Plan Name = abbreviated plan name

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #38. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #39.a. through #48.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #49 through #62.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
Plan Information, Checklist, and Certifications									
a.		Is this application a revised application submitted after the denial of a previously filed application for SFA?	Yes No	No	N/A	N/A		N/A	N/A
b.		Is this application a revised application submitted after a plan has withdrawn its application for SFA that was initially submitted under the interim final rule?	Yes No	No	N/A	N/A		N/A	N/A
c.		Is this application a revised application submitted after a plan has withdrawn its application for SFA that was submitted under the final rule?	Yes No	No	N/A	N/A		N/A	N/A
d.		Did the plan previously file a lock-in application?	Yes No	No	N/A	N/A	If a "lock-in" application was filed, provide the filing date.	N/A	N/A
e.		Has this plan been terminated?	Yes No	No	N/A	N/A	If terminated, provide date of plan termination.	N/A	N/A
f.		Is this plan a MPRA plan as defined under § 4262.4(a)(3) of PBGC's SFA regulation?	Yes No	No	N/A	N/A		N/A	N/A
1.	Section B, Item (1)a.	Does the application include the most recent plan document or restatement of the plan document and all amendments adopted since the last restatement (if any)?	Yes No	Yes	Bindery Pension Plan Doc Jan 2014.pdf	N/A		Pension plan documents, all versions available, and all amendments signed and dated	N/A
2.	Section B, Item (1)b.	Does the application include the most recent trust agreement or restatement of the trust agreement, and all amendments adopted since the last restatement (if any)?	Yes No	Yes	Bindery Pension Plan Trust Agreement.pdf	N/A		Pension plan documents, all versions available, and all amendments signed and dated	N/A
3.	Section B, Item (1)c.	Does the application include the most recent IRS determination letter? Enter N/A if the plan does not have a determination letter.	Yes No N/A	Yes	Bindery Determination Letter 2015.pdf	N/A		Pension plan documents, all versions available, and all amendments signed and dated	N/A
4.	Section B, Item (2)	Does the application include the actuarial valuation report for the 2018 plan year and each subsequent actuarial valuation report completed before the filing date of the initial application? Enter N/A if no actuarial valuation report was prepared because it was not required for any requested year. Is each report provided as a separate document using the required filename convention?	Yes No N/A	Yes	2018AVR Bindery Pension Plan.pdf 2019AVR Bindery Pension Plan.pdf 2020AVR Bindery Pension Plan.pdf 2021AVR Bindery Pension Plan.pdf 2021AVR Bindery Pension Plan (revised).pdf 2022AVR Bindery Pension Plan.pdf	N/A	6 reports are provided.	Most recent actuarial valuation for the plan	YYYYAVR Plan Name
5.a.		Does the application include the most recent rehabilitation plan (or funding improvement plan, if applicable), including all subsequent amendments and updates, and the percentage of total contributions received under each schedule of the rehabilitation plan or funding improvement plan for the most recent plan year available?	Yes No	Yes	Bindery 2017 Rehabilitation Plan.pdf	N/A		Rehabilitation plan (or funding improvement plan, if applicable)	N/A

Application to PBGC for Approval of Special Financial Assistance (SFA)

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5.b.	Section B, Item (5)	If the most recent rehabilitation plan does not include historical documentation of rehabilitation plan changes (if any) that occurred in calendar year 2020 and later, does the application include an additional document with these details? Enter N/A if the historical document is contained in the rehabilitation plans.	Yes No N/A	N/A		N/A	Rehabilitation plan ceased to exist effective April 1, 2020, when plan went insolvent.	Rehabilitation plan (or funding improvement plan, if applicable)	N/A
6.	Section B, Item (4)	Does the application include the plan's most recently filed (as of the filing date of the initial application) Form 5500 (Annual Return/Report of Employee Benefit Plan) and all schedules and attachments (including the audited financial statement)? Is the 5500 filing provided as a single document using the required filename convention?	Yes No	Yes	2021Form5500 Bindery Pension Plan.pdf	N/A		Latest annual return/report of employee benefit plan (Form 5500)	YYYYForm5500 Plan Name
7.a.		Does the application include the plan actuary's certification of plan status ("zone certification") for the 2018 plan year and each subsequent annual certification completed before the filing date of the initial application? Enter N/A if the plan does not have to provide certifications for any requested plan year. Is each zone certification (including the additional information identified in Checklist Items #7.b. and #7.c. below, if applicable) provided as a single document, separately for each plan year, using the required filename convention?	Yes No N/A	Yes	2020Zone20200330 Bindery Pension Plan 2019Zone20190329 Bindery Pension Plan 2018Zone20180329 Bindery Pension Plan	N/A	No zone certifications after 2020, due to Plan insolvency in April 2020.	Zone certification	YYYYZoneYYYYMMDD Plan Name, where the first "YYYY" is the applicable plan year, and "YYYYMMDD" is the date the certification was prepared.
7.b.	Section B, Item (5)	Does the application include documentation for all zone certifications that clearly identifies all assumptions used including the interest rate used for funding standard account purposes? If such information is provided in an addendum, addendums are only required for the most recent actuarial certification of plan status completed before January 1, 2021 and each subsequent annual certification. Is this information included in the single document in Checklist Item #7.a. for the applicable plan year?	Yes No N/A	Yes	N/A - include as part of documents in Checklist Item #7.a.	N/A		N/A - include as part of documents in Checklist Item #7.a.	N/A - included in a single document for each plan year - See Checklist Item #7.a.
7.c.		For a certification of critical and declining status, does the application include the required plan-year-by-plan-year projection (showing the items identified in Section B, Item (5)a. through (5)f. of the SFA Instructions) demonstrating the plan year that the plan is projected to become insolvent? If required, is this information included in the single document in Checklist Item #7.a. for the applicable plan year? Enter N/A if the plan entered N/A for Checklist Item #7.a. or if the application does not include a certification of critical and declining status.	Yes No N/A	Yes	N/A - include as part of documents in Checklist Item #7.a.	N/A	Investment returns are not shown, but expected market value is shown in each year, which reflects the investment returns. There were no withdrawal liability contributions reflected in any projected years, within the zone certification.	N/A - include as part of documents in Checklist Item #7.a.	N/A - included in a single document for each plan year - See Checklist Item #7.a.

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8.	Section B, Item (6)	Does the application include the most recent account statements for each of the plan's cash and investment accounts? Insolvent plans may enter N/A, and identify in the Plan Comments that this information was previously submitted to PBGC and the date submitted.	Yes No N/A	N/A	n/a	N/A	Information was most recently submitted to the PBGC on December 12, 2022.	Bank/Asset statements for all cash and investment accounts	N/A
9.	Section B, Item (7)	Does the application include the most recent plan financial statement (audited, or unaudited if audited is not available)? Insolvent plans may enter N/A, and identify in the Plan Comments that this information was previously submitted to PBGC and the date submitted.	Yes No N/A	Yes	12.31.2021 Audit Bindery Pension	N/A		Plan's most recent financial statement (audited, or unaudited if audited not available)	N/A
10.	Section B, Item (8)	Does the application include all of the plan's written policies and procedures governing the plan's determination, assessment, collection, settlement, and payment of withdrawal liability? Are all such items included as a single document using the required filenaming convention?	Yes No N/A	Yes	n/a	N/A	Contained within the plan document	Pension plan documents, all versions available, and all amendments signed and dated	WDL Plan Name
11.a.	Section B, Item (9)	Does the application include documentation of a death audit to identify deceased participants that was completed on the census data used for SFA purposes, including identification of the service provider conducting the audit and a copy of the results of the audit provided to the plan administrator by the service provider? If applicable, has personally identifiable information in this report been redacted prior to submission to PBGC? Is this information included as a single document using the required filenaming convention?	Yes No	Yes	Death Audit Bindery Pension Plan	N/A		Pension plan documents, all versions available, and all amendments signed and dated	Death Audit Plan Name
11.b.		If any known deaths occurred before the date of the census data used for SFA purposes, is a statement certifying these deaths were reflected for SFA calculation purposes provided?	Yes No N/A	Yes	N/A - include as part of documents in Checklist Item #11.a.	N/A		N/A	N/A - include as part of documents in Checklist Item #11.a.
12.	Section B, Item (10)	Does the application include information required to enable the plan to receive electronic transfer of funds if the SFA application is approved, including (if applicable) a notarized payment form? See SFA Instructions, Section B, Item (10).	Yes No	Yes	ACH Payment Enrollment Form.pdf	N/A		Other	N/A

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

APPLICATION CHECKLIST

Do NOT use this Application Checklist for a supplemented application. Instead use Application Checklist - Supplemented.

Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

-----Filers provide responses here for each Checklist Item:-----

Unless otherwise specified:
YYYY = plan year
Plan Name = abbreviated plan name

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
13.	Section C, Item (1)	Does the application include the plan's projection of expected benefit payments that should have been attached to the Form 5500 Schedule MB in response to line 8b(1) on the Form 5500 Schedule MB for plan years 2018 through the last year the Form 5500 was filed by the filing date of the initial application? Enter N/A if the plan is not required to respond Yes to line 8b(1) on the Form 5500 Schedule MB. See Template 1. Does the uploaded file use the required filenaming convention?	Yes No N/A	Yes	Template 1 Bindery Pension Plan	N/A		Financial assistance spreadsheet (template)	Template 1 Plan Name
14.	Section C, Item (2)	If the plan was required to enter 10,000 or more participants on line 6f of the most recently filed Form 5500 (by the filing date of the initial application), does the application include a current listing of the 15 largest contributing employers (the employers with the largest contribution amounts) and the amount of contributions paid by each employer during the most recently completed plan year before the filing date of the initial application (without regard to whether a contribution was made on account of a year other than the most recently completed plan year)? If this information is required, it is required for the 15 largest contributing employers even if the employer's contribution is less than 5% of total contributions. Enter N/A if the plan is not required to provide this information. See Template 2. Does the uploaded file use the required filenaming convention?	Yes No N/A	N/A		N/A		Contributing employers	Template 2 Plan Name
15.	Section C, Item (3)	Does the application include historical plan information for the 2010 plan year through the plan year immediately preceding the date the plan's initial application was filed that separately identifies: total contributions, total contribution base units (including identification of the unit used), average contribution rates, and number of active participants at the beginning of each plan year? For the same period, does the application show all other sources of non-investment income such as withdrawal liability payments collected, reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if applicable), and other identifiable sources of contributions? See Template 3. Does the uploaded file use the required filenaming convention?	Yes No	Yes	Template 3 Bindery Pension Plan	N/A		Historical Plan Financial Information (CBUs, contribution rates, contribution amounts, withdrawal liability payments)	Template 3 Plan Name
16.a.	Section C, Items (4)a., (4)e., and (4)f.	Does the application include the information used to determine the amount of SFA for the plan using the basic method described in § 4262.4(a)(1) based on a deterministic projection and using the actuarial assumptions as described in § 4262.4(e)? See Template 4A, 4A-4 SFA Details .4(a)(1) sheet and Section C, Item (4) of the SFA Filing Instructions for more details on these requirements. Does the uploaded file use the required filenaming convention?	Yes No	Yes	Template 4A Bindery Pension Plan	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 4A Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

APPLICATION CHECKLIST

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Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

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 Plan Name = abbreviated plan name

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
16.b.i.	Addendum D Section C, Item (4)a. - MPRA plan information A. Addendum D Section C, Item (4)e. - MPRA plan information A.	If the plan is a MPRA plan, does the application also include the information used to determine the amount of SFA for the plan using the <u>increasing assets method</u> described in § 4262.4(a)(2)(i) based on a deterministic projection and using the actuarial assumptions as described in § 4262.4(e)? See Template 4A, 4A-5 SFA Details .4(a)(2)(i) sheet and Addendum D for more details on these requirements. Enter N/A if the plan is not a MPRA Plan.	Yes No N/A	N/A	N/A - included as part of Template 4A Plan Name	N/A	Not a MPRA plan	N/A	N/A - included in Template 4A Plan Name
16.b.ii.	Addendum D Section C, Item (4)f. - MPRA plan information A.	If the plan is a MPRA plan for which the requested amount of SFA is determined using the <u>increasing assets method</u> described in § 4262.4(a)(2)(i), does the application also explicitly identify the projected SFA exhaustion year based on the <u>increasing assets method</u> ? See Template 4A, 4A-5 SFA Details .4(a)(2)(i) sheet and Addendum D. Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined based on the present value method.	Yes No N/A	N/A	N/A - included as part of Template 4A Plan Name	N/A	Not a MPRA plan	N/A	N/A - included in Template 4A Plan Name
16.b.iii.	Addendum D Section C, Item (4)a. - MPRA plan information B. Addendum D Section C, Item (4)e. (4)f., and (4)g. - MPRA plan information B.	If the plan is a MPRA plan for which the requested amount of SFA is determined using the <u>present value method</u> described in § 4262.4(a)(2)(ii), does the application also include the information for such plans as shown in Template 4B, including 4B-1 SFA Ben Pmts sheet, 4B-2 SFA Details 4(a)(2)(ii) sheet, and 4B-3 SFA Exhaustion sheet? See Addendum D and Template 4B. Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined based on the increasing assets method.	Yes No N/A	N/A		N/A	Not a MPRA plan	N/A	Template 4B Plan Name
16.c.	Section C, Items (4)b. and (4)c.	Does the application include identification of the non-SFA interest rate and the SFA interest rate, including details on how each was determined? See Template 4A, 4A-1 Interest Rates sheet.	Yes No	Yes	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name
16.d.	Section C, Item (4)e.ii.	For each year in the SFA coverage period, does the application include the projected benefit payments (excluding make-up payments, if applicable), separately for current retirees and beneficiaries, current terminated vested participants not yet in pay status, current active participants, and new entrants? See Template 4A, 4A-2 SFA Ben Pmts sheet.	Yes No	Yes	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name
16.e.	Section C, Item (4)e.iv. and (4)e.v.	For each year in the SFA coverage period, does the application include a breakdown of the administrative expenses between PBGC premiums and all other administrative expenses? Does the application include the projected total number of participants at the beginning of each plan year in the SFA coverage period? See Template 4A, 4A-3 SFA Pcount and Admin Exp sheet.	Yes No	Yes	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

APPLICATION CHECKLIST

v20221129p

Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

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 Plan Name = abbreviated plan name

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
17.a.	Section C, Item (5)	For a plan that is not a MPRA plan, does the application include a separate deterministic projection ("Baseline") in the same format as Checklist Items #16.a., #16.d., and #16.e. that shows the amount of SFA that would be determined using the <u>basic method</u> if the assumptions/methods used are the same as those used in the most recent actuarial certification of plan status completed before January 1, 2021 ("pre-2021 certification of plan status") excluding the plan's non-SFA interest rate and SFA interest rate, which should be the same as in Checklist Item #16.a.? See Section C, Item (5) of the SFA Filing Instructions for other potential exclusions from this requirement. If (a) the plan is a MPRA plan, or if (b) this item is not required for a plan that is not a MPRA plan, enter N/A. If entering N/A due to (b), add information in the Plan Comments to explain why this item is not required. Does the uploaded file use the required filenaming convention?	Yes No N/A	Yes	Template 5A Bindery Pension Plan	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 5A Plan Name
17.b.	Addendum D Section C, Item (5)	For a MPRA plan for which the requested amount of SFA is determined using the <u>increasing assets method</u> , does the application include a separate deterministic projection ("Baseline") in the same format as Checklist Items #16.b.i., #16.d., and #16.e. that shows the amount of SFA that would be determined using the <u>increasing assets method</u> if the assumptions/methods used are the same as those used in the most recent actuarial certification of plan status completed before January 1, 2021 ("pre-2021 certification of plan status") excluding the plan's non-SFA interest rate and SFA interest rate, which should be the same as used in Checklist Item #16.b.i.? See Section C, Item (5) of the SFA Filing Instructions for other potential exclusions from this requirement. Also see Addendum D. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the present value method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Does the uploaded file use the required filenaming convention?	Yes No N/A	N/A		N/A	Plan is not a MPRA Plan	Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 5A Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

APPLICATION CHECKLIST

Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
17.c.	Addendum D Section C, Item (5)	For a MPRA plan for which the requested amount of SFA is determined using the <u>present value method</u> , does the application include a separate deterministic projection ("Baseline") in the same format as Checklist Item #16.b.iii. that shows the amount of SFA that would be determined using the <u>present value method</u> if the assumptions used/methods are the same as those used in the most recent actuarial certification of plan status completed before January 1, 2021 ("pre-2021 certification of plan status") excluding the plan's SFA interest rate which should be the same as used in Checklist Item #16.b.iii. See Section C, Item (5) of the SFA Filing Instructions for other potential exclusions from this requirement. Also see Addendum D. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the increasing assets method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Has this document been uploaded using the required filenaming convention?	Yes No N/A	N/A		N/A	Plan is not a MPRA Plan	Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 5B Plan Name
18.a.	Section C, Item (6)	For a plan that is not a MPRA plan, does the application include a reconciliation of the change in the total amount of requested SFA due to each change in assumption/method from the Baseline to the requested SFA amount? Does the application include a deterministic projection and other information for each assumption/method change, in the same format as Checklist Item #16.a? Enter N/A if the plan is not required to provide Baseline information in Checklist Item #17.a. Enter N/A if the requested SFA amount in Checklist Item #16.a. is the same as the amount shown in the Baseline details of Checklist Item #17.a. See Section C, Item (6) of the SFA Filing Instructions for other potential exclusions from this requirement. If the plan is a MPRA plan, enter N/A. If the plan is otherwise not required to provide this item, enter N/A and provide an explanation in the Plan Comments. Does the uploaded file use the required filenaming convention?	Yes No N/A	Yes	Template 6A Bindery Pension Plan	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 6A Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

APPLICATION CHECKLIST

v20221129p

Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
18.b.	Addendum D Section C, Item (6)	For a MPRA plan for which the requested amount of SFA is based on the <u>increasing assets method</u> , does the application include a reconciliation of the change in the total amount of requested SFA using the <u>increasing assets method</u> due to each change in assumption/method from the Baseline to the requested SFA amount? Does the application include a deterministic projection and other information for each assumption/method change, in the same format as Checklist Item #16.b.i.? Enter N/A if the plan is not required to provide Baseline information in Checklist Item #17.b. Enter N/A if the requested SFA amount in Checklist Item #16.b.i. is the same as the amount shown in the Baseline details of Checklist Item #17.b. See Addendum D. See Section C, Item (6) of the SFA Filing Instructions for other potential exclusions from this requirement, and enter N/A if this item is not otherwise required. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the present value method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Does the uploaded file use the required filenaming convention?	Yes No N/A	N/A		N/A	Plan is not a MPRA Plan	Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 6A Plan Name
18.c.	Addendum D Section C, Item (6)	For a MPRA plan for which the requested amount of SFA is based on the <u>present value method</u> , does the application include a reconciliation of the change in the total amount of requested SFA using the <u>present value method</u> due to each change in assumption/method from Baseline to the requested SFA amount? Does the application include a deterministic projection and other information for each assumption/method change, in the same format as Checklist Item #16.b.iii.? See Section C, Item (6) of the SFA Filing Instructions for other potential exclusions from this requirement. Also see Addendum D. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the increasing assets method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Has this document been uploaded using the required filenaming convention?	Yes No N/A	N/A		N/A	Plan is not a MPRA Plan	Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 6B Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

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EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
19.a.	Section C, Item (7)a.	For plans eligible for SFA under § 4262.3(a)(1) or § 4262.3(a)(3), does the application include a table identifying which assumptions/methods used in determining the plan's eligibility for SFA differ from those used in the pre-2021 certification of plan status, and does that table include brief explanations as to why using those assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable (an abbreviated version of information provided in Checklist Item #27.a.)? Enter N/A if the plan is eligible for SFA under § 4262.3(a)(2) or § 4262.3(a)(4) or if the plan is eligible based on a certification of plan status completed before 1/1/2021. Also enter N/A if the plan is eligible based on a certification of plan status completed after 12/31/2020 but that reflects the same assumptions as those in the pre-2021 certification of plan status. See Template 7, 7a Assump Changes for Elig sheet. Does the uploaded file include both Checklist Items #19.a. and #19.b., and does it use the required filenaming convention?	Yes No N/A	N/A		N/A	Plan is eligible due to insolvency, regulation 4262.3(a)(4)	Financial assistance spreadsheet (template)	Template 7 Plan Name.
19.b.	Section C, Item (7)b.	Does the application include a table identifying which assumptions/methods used to determine the requested SFA differ from those used in the pre-2021 certification of plan status (except the interest rates used to determine SFA)? Does this item include brief explanations as to why using those original assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable? If a changed assumption is an extension of the CBU assumption or the administrative expenses assumption as described in Paragraph A "Adoption of assumptions not previously factored into pre-2021 certification of plan status" of Section III, Acceptable Assumption Changes of PBGC's SFA assumptions guidance, does the application state so? This should be an abbreviated version of information provided in Checklist Item #27.b. See Template 7, 7b Assump Changes for Amount sheet. Does the uploaded file include both Checklist Items #19.a. and #19.b., and does it use the required filenaming convention?	Yes No	Yes	Template 7 Bindery Pension Plan	N/A		Financial assistance spreadsheet (template)	Template 7 Plan Name
20.a.	Section C, Item (8)	Does the application include details of the projected contributions and withdrawal liability payments used to calculate the requested SFA amount, including total contributions, contribution base units (including identification of base unit used), average contribution rate(s), reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if applicable), and any other identifiable contribution streams? See Template 8.	Yes No	Yes	Template 8 Bindery Pension Plan	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 8 Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

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EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
20.b.	Section C, Item (c)	Does the application separately show the amounts of projected withdrawal liability payments for employers that are currently withdrawn as of the date the initial application is filed, and assumed future withdrawals? Does the application also provide the projected number of active participants at the beginning of each plan year? See Template 8.	Yes No	Yes	N/A - include as part of Checklist Item #20.a.	N/A		N/A	N/A - included in <i>Template 8 Plan Name</i>
21.	Section D	Was the application signed and dated by an authorized trustee who is a current member of the board of trustees or another authorized representative of the plan sponsor and include the printed name and title of the signer?	Yes No	Yes	SFA App Bindery Pension Plan	Page 1 of 7	Identify here the name of the single document that includes all information requested in Section D of the SFA Filing Instructions (Checklist Items #21 through #28.c.).	Financial Assistance Application	SFA App Plan Name
22.a.	Section D, Item (1)	For a plan that is not a MPRA plan, does the application include an optional cover letter? Enter N/A if the plan is a MPRA plan, or if the plan is not a MPRA plan and did not include an optional cover letter.	Yes N/A	Yes	N/A - included as part of SFA App Plan Name	Page 1 of 7	For each Checklist Item #21 through #28.c., identify the relevant page number(s) within the single document.	N/A	N/A - included as part of SFA App Plan Name
22.b.		For a plan that is a MPRA plan, does the application include a cover letter? Does the cover letter identify the calculation method (basic method, increasing assets method, or present value method) that provides the greatest amount of SFA? For a MPRA plan with a partition, does the cover letter include a statement that the plan has been partitioned under section 4233 of ERISA? Enter N/A if the plan is not a MPRA plan.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name		Not a MPRA plan	N/A	N/A - included as part of SFA App Plan Name
23.	Section D, Item (2)	Does the application include the name, address, email, and telephone number of the plan sponsor, plan sponsor's authorized representative, and any other authorized representatives?	Yes No	Yes	N/A - included as part of SFA App Plan Name	Page 2 of 7		N/A	N/A - included as part of SFA App Plan Name
24.	Section D, Item (3)	Does the application identify the eligibility criteria in § 4262.3 that qualifies the plan as eligible to receive SFA, and include the requested information for each item that is applicable, as described in Section D, Item (3) of the SFA Filing Instructions?	Yes No	Yes	N/A - included as part of SFA App Plan Name	Page 3 of 7	Briefly note here the basis for eligibility for SFA.	N/A	N/A - included as part of SFA App Plan Name
25.a.	Section D, Item (4)	If the plan's application is submitted on or before March 11, 2023, does the application identify the plan's priority group (see § 4262.10(d)(2))? Enter N/A if the plan's application is submitted after March 11, 2023.	Yes No N/A	Yes	N/A - included as part of SFA App Plan Name	Page 4 of 7	Briefly identify here the priority group, if applicable.	N/A	N/A - included as part of SFA App Plan Name
25.b.		If the plan is submitting an emergency application under § 4262.10(f), is the application identified as an emergency application with the applicable emergency criteria identified? Enter N/A if the plan is not submitting an emergency application.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name		Briefly identify the emergency criteria, if applicable.	N/A	N/A - included as part of SFA App Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

APPLICATION CHECKLIST

v20221129p

Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
26.	Section D, Item (5)	Does the application include a detailed narrative description of the development of the assumed future contributions and assumed future withdrawal liability payments used in the basic method (and in the increasing assets method for a MPRA plan)?	Yes No	Yes	N/A - included as part of SFA App Plan Name	Page 5 of 7		N/A	N/A - included as part of SFA App Plan Name
27.a.	Section D, Item (6)a.	For plans eligible for SFA under § 4262.3(a)(1) or § 4262.3(a)(3), does the application identify which assumptions/methods (if any) used in showing the plan's eligibility for SFA differ from those used in the most recent certification of plan status completed before 1/1/2021? If there are any assumption/method changes, does the application include detailed explanations and supporting rationale and information as to why using the identified assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable? Enter N/A if the plan is not eligible under § 4262.3(a)(1) or § 4262.3(a)(3). Enter N/A if there are no such assumption changes.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
27.b.	Section D, Item (6)b.	Does the application identify which assumptions/methods (if any) used to determine the requested SFA amount differ from those used in the most recent certification of plan status completed before 1/1/2021 (excluding the plan's non-SFA and SFA interest rates, which must be the same as the interest rates required by § 4262.4(e)(1) and (2))? If there are any assumption/method changes, does the application include detailed explanations and supporting rationale and information as to why using the identified original assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable? Does the application state if the changed assumption is an extension of the CBU assumption or the administrative expenses assumption as described in Paragraph A "Adoption of assumptions not previously factored into pre-2021 certification of plan status" of Section III, Acceptable Assumption Changes of PBGC's SFA Assumptions?	Yes No	Yes	N/A - included as part of SFA App Plan Name	Page 6 of 7 Page 7 of 7		N/A	N/A - included as part of SFA App Plan Name
27.c.	Section D, Item (6)	If the mortality assumption uses a plan-specific mortality table or a plan-specific adjustment to a standard mortality table (regardless of if the mortality assumption is changed or unchanged from that used in the most recent certification of plan status completed before 1/1/2021), is supporting information provided that documents the methodology used and the rationale for selection of the methodology used to develop the plan-specific rates, as well as detailed information showing the determination of plan credibility and plan experience? Enter N/A is the mortality assumption does not use a plan-specific mortality table or a plan-specific adjustment to a standard mortality table for eligibility or for determining the SFA amount.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
28.a.	Section D, Item (7)	Does the application include, for an eligible plan that implemented a suspension of benefits under section 305(e)(9) or section 4245(a) of ERISA, a narrative description of how the plan will reinstate the benefits that were previously suspended and a proposed schedule of payments (equal to the amount of benefits previously suspended) to participants and beneficiaries? Enter N/A for a plan that has not implemented a suspension of benefits.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
28.b.	Section D, Item (7)	If Yes was entered for Checklist Item #28.a., does the proposed schedule show the yearly aggregate amount and timing of such payments, and is it prepared assuming the effective date for reinstatement is the day after the SFA measurement date? Enter N/A for a plan that entered N/A for Checklist Item #28.a.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
28.c.	Section D, Item (7)	If the plan restored benefits under 26 CFR 1.432(e)(9)-1(e)(3) before the SFA measurement date, does the proposed schedule reflect the amount and timing of payments of restored benefits and the effect of the restoration on the benefits remaining to be reinstated? Enter N/A for a plan that did not restore benefits under 26 CFR 1.432(e)(9)-1(e)(3) before the SFA measurement date. Also enter N/A for a plan that entered N/A for Checklist Items #28.a. and #28.b.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
29.a.	Section E, Item (1)	Does the application include a fully completed Application Checklist, including the required information at the top of the Application Checklist (plan name, employer identification number (EIN), 3-digit plan number (PN), and SFA amount requested)?	Yes No	Yes	App Checklist Bindery Pension Plan	N/A		Special Financial Assistance Checklist	App Checklist Plan Name
29.b.	Section E, Item (1) - Addendum A	If the plan is required to provide information required by Addendum A of the SFA Filing Instructions (for "certain events"), are the additional Checklist Items #39.a. through #48.b. completed? Enter N/A if the plan is not required to submit the additional information described in Addendum A.	Yes No N/A	N/A	N/A	N/A		Special Financial Assistance Checklist	N/A

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
30.	Section E, Item (2)	If the plan claims SFA eligibility under § 4262.3(a)(1) of PBGC's SFA regulation based on a certification by the plan's enrolled actuary of plan status for SFA eligibility purposes completed on or after January 1, 2021, does the application include: (i) plan actuary's certification of plan status for SFA eligibility purposes for the specified year (and, if applicable, for each plan year after the plan year for which the pre-2021 zone certification was prepared and for the plan year immediately prior to the specified year)? (ii) for each certification in (i) above, does the application include all details and additional information described in Section B, Item (5) of the SFA Filing Instructions, including clear documentation of all assumptions, methods and census data used? (iii) for each certification in (i) above, does the application identify all assumptions and methods that are different from those used in the pre-2021 zone certification? Does the certification by the plan's enrolled actuary include clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion? If the plan does not claim SFA eligibility under § 4262.3(a)(1) or claims SFA eligibility under § 4262.3(a)(1) using a zone certification completed before January 1, 2021, enter N/A. Is the information for this Checklist Item #30.a. contained in a single document and uploaded using the required filenaming convention?	Yes No N/A	N/A		N/A	January 1, 2020 zone certification of Critical & Declining Status used for SFA eligibility. Plan is eligible due to insolvency, regulation 4262.3(a)(4).	Financial Assistance Application	SFA Elig Cert CD Plan Name
31.a.	Section E, Item (3)	If the plan claims SFA eligibility under § 4262.3(a)(3) of PBGC's SFA regulation based on a certification by the plan's enrolled actuary of plan status for SFA eligibility purposes completed on or after January 1, 2021, does the application include: (i) plan actuary's certification of plan status for SFA eligibility purposes for the specified year (and, if applicable, for each plan year after the plan year for which the pre-2021 zone certification was prepared and for the plan year immediately prior to the specified year)? (ii) for each certification in (i) above, does the application include all details and additional information described in Section B, Item (5) of the SFA Filing Instructions, including clear documentation of all assumptions, methods and census data used? (iii) for each certification in (i) above, does the application identify all assumptions and methods that are different from those used in the pre-2021 zone certification? Does the certification by the plan's enrolled actuary include clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion? If the plan does not claim SFA eligibility under § 4262.3(a)(3) or claims SFA eligibility under § 4262.3(a)(3) using a zone certification completed before January 1, 2021, enter N/A. Is the information for Checklist Items #31.a. and #31.b. contained in a single document and uploaded using the required filenaming convention?		N/A		N/A	January 1, 2020 zone certification of Critical & Declining Status used for SFA eligibility. Plan is eligible due to insolvency, regulation 4262.3(a)(4).	Financial Assistance Application	SFA Elig Cert C Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
31.b.	Section E, Item (3)	If the plan claims SFA eligibility under § 4262.3(a)(3) of PBGC's SFA regulation, does the application include a certification from the plan's enrolled actuary that the plan qualifies for SFA based on the applicable certification of plan status for SFA eligibility purposes for the specified year, and by meeting the other requirements of § 4262.3(c) of PBGC's SFA regulation. Does the provided certification include: (i) identification of the specified year for each component of eligibility (certification of plan status for SFA eligibility purposes, modified funding percentage, and participant ratio) (ii) derivation of the modified funded percentage (iii) derivation of the participant ratio Does the certification identify all assumptions and methods (including supporting rationale, and where applicable, reliance on the plan sponsor) used to develop the withdrawal liability that is utilized in the calculation of the modified funded percentage? Enter N/A if response to Checklist Item #31.a. is N/A. Is the information for Checklist Items #31.a. and #31.b. contained in a single document and uploaded using the required filenaming convention?	Yes No N/A	N/A	N/A - included with SFA Elig Cert C Plan Name	N/A		Financial Assistance Application	N/A - included in SFA Elig Cert C Plan Name
32.	Section E, Item (4)	If the plan's application is submitted on or prior to March 11, 2023, does the application include a certification from the plan's enrolled actuary that the plan is eligible for priority status, with specific identification of the applicable priority group? This item is not required (enter N/A) if the plan is insolvent, has implemented a MPRA suspension as of 3/11/2021, is in critical and declining status and had 350,000+ participants, or is listed on PBGC's website at www.pbgc.gov as being in priority group 6. See § 4262.10(d). Does the certification by the plan's enrolled actuary include clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion? Is the filename uploaded using the required filenaming convention?	Yes No N/A	N/A		N/A		Financial Assistance Application	PG Cert Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

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33.a.		Does the application include the certification by the plan's enrolled actuary that the requested amount of SFA is the amount to which the plan is entitled under section 4262(j)(1) of ERISA and § 4262.4 of PBGC's SFA regulation? Does this certification include: (i) plan actuary's certification that identifies the requested amount of SFA and certifies that this is the amount to which the plan is entitled? (ii) clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion? Is the information in Checklist #33a combined with #33b (if applicable) as a single document, and uploaded using the required filenaming convention?	Yes No	Yes	SFA Amount Cert Bindery Pension Plan	N/A		Financial Assistance Application	SFA Amount Cert Plan Name
33.b.	Section E, Item (5)	If the plan is a MPRA plan, does the certification by the plan's enrolled actuary identify the amount of SFA determined under the basic method described in § 4262.4(a)(1) and the amount determined under the increasing assets method in § 4262.4(a)(2)(i)? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is not the greatest amount of SFA under § 4262.4(a)(2), does the certification state as such? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is the greatest amount of SFA under § 4262.4(a)(2), does the certification identify that amount? Enter N/A if the plan is not a MPRA plan.	Yes No N/A	N/A	N/A - included with SFA Amount Cert Plan Name	N/A		N/A - included in SFA Amount Cert Plan Name	N/A - included in SFA Amount Cert Plan Name
34.	Section E, Item (6)	Does the application include the plan sponsor's identification of the amount of fair market value of assets at the SFA measurement date and certification that this amount is accurate? Does the application also include: (i) information that substantiates the asset value and how it was developed (e.g., trust or account statements, specific details of any adjustments)? (ii) a reconciliation of the fair market value of assets from the date of the most recent audited plan financial statements to the SFA measurement date (showing beginning and ending fair market value of assets for this period as well as the following items for the period: contributions, withdrawal liability payments, benefits paid, administrative expenses, and investment income)? With the exception of account statements and financial statements already provided as Checklist Items #8 and #9, is all information contained in a single document that is uploaded using the required filenaming convention?	Yes No	Yes	FMV Cert Bindery Pension Plan	N/A		Financial Assistance Application	FMV Cert Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

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Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
35.	Section E, Item (7)	Does the application include a copy of the executed plan amendment required by § 4262.6(e)(1) of PBGC's SFA regulation which (i) is signed by authorized trustee(s) of the plan and (ii) includes the plan compliance language in Section E, Item (7) of the SFA Filing Instructions?	Yes No	Yes	Compliance Amendment Bindery Pension Plan	N/A		Pension plan documents, all versions available, and all amendments signed and dated	<i>Compliance Amend Plan Name</i>
36.	Section E, Item (8)	In the case of a plan that suspended benefits under section 305(e)(9) or section 4245 of ERISA, does the application include: (i) a copy of the proposed plan amendment(s) required by § 4262.6(e)(2) to reinstate suspended benefits and pay make-up payments? (ii) a certification by the plan sponsor that the proposed plan amendment(s) will be timely adopted? Is the certification signed by either all members of the plan's board of trustees or by one or more trustees duly authorized to sign the certification on behalf of the entire board (including, if applicable, documentation that substantiates the authorization of the signing trustees)? Enter N/A if the plan has not suspended benefits. Is all information included in a single document that is uploaded using the required filenaming convention?	Yes No N/A	Yes	Reinstatement Amend Bindery Pension Plan	N/A		Pension plan documents, all versions available, and all amendments signed and dated	<i>Reinstatement Amend Plan Name</i>
37.	Section E, Item (9)	In the case of a plan that was partitioned under section 4233 of ERISA, does the application include a copy of the executed plan amendment required by § 4262.9(c)(2)? Enter N/A if the plan was not partitioned. Is the document uploaded using the required filenaming convention?	Yes No N/A	N/A		N/A		Pension plan documents, all versions available, and all amendments signed and dated	<i>Partition Amend Plan Name</i>
38.	Section E, Item (10)	Does the application include one or more copies of the penalties of perjury statement (see Section E, Item (10) of the SFA Filing Instructions) that (a) are signed by an authorized trustee who is a current member of the board of trustees, and (b) includes the trustee's printed name and title. Is all such information included in a single document and uploaded using the required filenaming convention?	Yes No	Yes	Penalty Bindery Pension Plan	N/A		Financial Assistance Application	<i>Penalty Plan Name</i>

Additional Information for Certain Events under § 4262.4(f) - Applicable to Any Events in § 4262.4(f)(2) through (f)(4) and Any Mergers in § 4262.4(f)(1)(ii)
NOTE: If the plan is not required to provided information described in Addendum A of the SFA Filing Instructions, the Plan Response should be left blank for the remaining Checklist Items.

Application to PBGC for Approval of Special Financial Assistance (SFA)

APPLICATION CHECKLIST

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39.a.	Addendum A for Certain Events Section C, Item (4)	Does the application include an additional version of Checklist Item #16.a. (also including Checklist Items #16.c., #16.d., and #16.e.), that shows the determination of the SFA amount <u>using the basic method</u> described in § 4262.4(a)(1) as if any events had not occurred? See Template 4A.	Yes No			N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	For additional submission due to any event: <i>Template 4A Plan Name CE</i> . For an additional submission due to a merger, <i>Template 4A Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.
39.b.i.	Addendum A for Certain Events Section C, Item (4)	If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>increasing assets method</u> described in § 4262.4(a)(2)(i), does the application also include an additional version of Checklist Item #16.b.i. that shows the determination of the SFA amount using the <u>increasing assets method</u> as if any events had not occurred? See Template 4A, sheet <i>4A-5 SFA Details .5(a)(2)(i)</i> . Enter N/A if the plan is not a MPRA Plan or if the plan is a MPRA plan for which the requested amount of SFA is based on the present value method.	Yes No N/A		N/A - included as part of file in Checklist Item #39.a.	N/A		N/A	N/A - included as part of file in Checklist Item #39.a.
39.b.ii.	Addendum A for Certain Events Section C, Item (4)	If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>increasing assets method</u> described in § 4262.4(a)(2)(i), does the application also include an additional version of Checklist Item #16.b.ii. that explicitly identifies the projected SFA exhaustion year based on the <u>increasing assets method</u> ? See Template 4A, <i>4A-5 SFA Details .4(a)(2)(i)</i> sheet and Addendum D. Enter N/A if the plan is not a MPRA Plan or if the plan is a MPRA plan for which the requested amount of SFA is based on the present value method.	Yes No N/A			N/A		N/A	N/A - included as part of file in Checklist Item #39.a.
39.b.iii.	Addendum A for Certain Events Section C, Item (4)	If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>present value method</u> described in § 4262.4(a)(2)(ii), does the application also include an additional version of Checklist Item #16.b.iii. that shows the determination of the SFA amount using the <u>present value method</u> as if any events had not occurred? See Template 4B, sheet <i>4B-1 SFA Ben Pmts</i> , sheet <i>4B-2 SFA Details .4(a)(2)(ii)</i> , and sheet <i>4B-3 SFA Exhaustion</i> . Enter N/A if the plan is not a MPRA Plan or if the plan is a MPRA plan for which the requested amount of SFA is based on the increasing assets method.	Yes No N/A			N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	For additional submission due to any event: <i>Template 4B Plan Name CE</i> . For an additional submission due to a merger, <i>Template 4B Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

APPLICATION CHECKLIST

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Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #38. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #39.a. through #48.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #49 through #62.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
40.	Addendum A for Certain Events Section C, Item (4)	For any merger, does the application show the SFA determination for this plan <u>and for each plan merged into this plan</u> (each of these determined as if they were still separate plans)? See Template 4A for a non-MPRA plan using the basic method, and for a MPRA plan using the increasing assets method. See Template 4B for a MPRA Plan using the present value method. Enter N/A if the plan has not experienced a merger.	Yes No N/A			N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	For an additional submission due to a merger, <i>Template 4A (or Template 4B) Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.
41.a.	Addendum A for Certain Events Section D	Does the application include a narrative description of any event and any merger, including relevant supporting documents which may include plan amendments, collective bargaining agreements, actuarial certifications related to a transfer or merger, or other relevant materials?	Yes No		N/A - included as part of SFA App Plan Name		For each Checklist Item #41.a. through #44.b., identify the relevant page number(s) within the single document.	Financial Assistance Application	SFA App Plan Name
41.b.	Addendum A for Certain Events Section D	For a transfer or merger event, does the application include identifying information for all plans involved including plan name, EIN and plan number, and the date of the transfer or merger?	Yes No		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
42.a.	Addendum A for Certain Events Section D	Does the narrative description in the application identify the amount of SFA reflecting any event, the amount of SFA determined as if the event had not occurred, and confirmation that the requested SFA is no greater than the amount that would have been determined if the event had not occurred, unless the event is a contribution rate reduction and such event lessens the risk of loss to plan participants and beneficiaries?	Yes No		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
42.b.	Addendum A for Certain Events Section D	For a merger, is the determination of SFA as if the event had not occurred equal to the sum of the amount that would be determined for this plan and each plan merged into this plan (each as if they were still separate plans)? Enter N/A if the event described in Checklist Item #41.a. was not a merger.	Yes No N/A		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
43.a.	Addendum A for Certain Events Section D	Does the application include an additional version of Checklist Item #24 that shows the determination of SFA eligibility as if any events had not occurred?	Yes No		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
43.b.	Addendum A for Certain Events Section D	For any merger, does this item include demonstrations of SFA eligibility for this plan and for each plan merged into this plan (each of these determined as if they were still separate plans)? Enter N/A if the event described in Checklist Item #42.a. was not a merger.	Yes No N/A		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

APPLICATION CHECKLIST

Do NOT use this Application Checklist for a supplemented application. Instead use Application Checklist - Supplemented.

Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

-----Filers provide responses here for each Checklist Item:-----

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 Plan Name = abbreviated plan name

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #38. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #39.a. through #48.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #49 through #62.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
44.a.	Addendum A for Certain Events Section D	If the event is a contribution rate reduction and the amount of requested SFA is not limited to the amount of SFA determined as if the event had not occurred, does the application include a detailed demonstration that shows that the event lessens the risk of loss to plan participants and beneficiaries? Enter N/A if the event is not a contribution rate reduction, or if the event is a contribution rate reduction but the requested SFA is limited to the amount of SFA determined as if the event had not occurred.	Yes No N/A		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
44.b.	Addendum A for Certain Events Section D	Does the demonstration in Checklist Item #44.a. also identify all assumptions used, supporting rationale for the assumptions and other relevant information? Enter N/A if the plan entered N/A for Checklist Item #44.a.	Yes No N/A		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
45.a.	Addendum A for Certain Events Section E, Items (2) and (3)	Does the application include an additional certification from the plan's enrolled actuary with respect to the plan's SFA eligibility but with eligibility determined as if any events had not occurred? This should be in the format of Checklist Item #30 if the SFA eligibility is based on the plan status of critical and declining using a zone certification completed on or after January 1, 2021. This should be in the format of Checklist Items #31.a. and #31.b. if the SFA eligibility is based on the plan status of critical using a zone certification completed on or after January 1, 2021. If the above SFA eligibility is not based on § 4262.3(a)(1) or § 4262.3(a)(3) or is based on a zone certification completed prior to January 1, 2021, enter N/A. Is all relevant information contained in a single document and uploaded using the required filenaming convention?	Yes No N/A			N/A		Financial Assistance Application	SFA Elig Cert Plan Name CE
45.b.	Addendum A for Certain Events Section E, Items (2) and (3)	For any merger, does the application include additional certifications of the SFA eligibility for this plan and for each plan merged into this plan (each of these determined as if they were still separate plans)? If the above SFA eligibility is not based on § 4262.3(a)(1) or § 4262.3(a)(3) or is based on a zone certification completed prior to January 1, 2021, enter N/A. Enter N/A if the event described in Checklist Item #41.a. was not a merger.	Yes No N/A			N/A		Financial Assistance Application	SFA Elig Cert Plan Name Merged CE "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

Application to PBGC for Approval of Special Financial Assistance (SFA)

APPLICATION CHECKLIST

v20221129p

Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

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Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #38. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #39.a. through #48.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #49 through #62.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
46.a.	Addendum A for Certain Events Section E, Item (5)	Does the application include an additional certification from the plan's enrolled actuary with respect to the plan's SFA amount (in the format of Checklist Item #33.a.), but with the SFA amount determined as if any events had not occurred?	Yes No			N/A		Financial Assistance Application	SFA Amount Cert Plan Name CE
46.b.	Addendum A for Certain Events Section E, Item (5)	If the plan is a MPRA plan, does the certification in Checklist Item #46.a. identify the amount of SFA determined under the basic method described in § 4262.4(a)(1) and the amount determined under the increasing assets method in § 4262.4(a)(2)(i)? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is not the greatest amount of SFA under § 4262.4(a)(2), does the certification state as such? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is the greatest amount of SFA under § 4262.4(a)(2), does the certification identify that amount? Enter N/A if the plan is not a MPRA plan.	Yes No N/A		N/A - included in SFA Amount Cert Plan Name CE	N/A		N/A - included in SFA Amount Cert Plan Name	N/A - included in SFA Amount Cert Plan Name CE
46.c.	Addendum A for Certain Events Section E, Item (5)	Does the certification in Checklist Items #46.a. and #46.b. (if applicable) clearly identify all assumptions and methods used, sources of participant data and census data, and other relevant information?	Yes No		N/A - included in SFA Amount Cert Plan Name CE	N/A		N/A - included in SFA Amount Cert Plan Name	N/A - included in SFA Amount Cert Plan Name CE
47.a.	Addendum A for Certain Events Section E, Item (5)	For any merger, does the application include additional certifications of the SFA amount determined for this plan and for each plan merged into this plan (each of these determined as if they were still separate plans) ? Enter N/A if the event described in Checklist Item #42.a. was not a merger.	Yes No N/A			N/A		Financial Assistance Application	SFA Amount Cert Plan Name Merged CE "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.
47.b.	Addendum A for Certain Events Section E, Item (5)	For any merger, do the certifications clearly identify all assumptions and methods used, sources of participant data and census data, and other relevant information? Enter N/A if the event described in Checklist Item #42.a. was not a merger.	Yes No N/A		N/A - included in SFA Amount Cert Plan Name CE	N/A		N/A - included in SFA Amount Cert Plan Name CE	N/A - included in SFA Amount Cert Plan Name CE

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

APPLICATION CHECKLIST

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Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001
SFA Amount Requested:	\$22,967,100.00

-----Filers provide responses here for each Checklist Item:-----

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Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #38. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #39.a. through #48.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #49 through #62.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
48.a.	Addendum A for Certain Events Section E	If the event is a contribution rate reduction and the amount of requested SFA is not limited to the amount of SFA determined as if the event had not occurred, does the application include a certification from the plan's enrolled actuary (or, if appropriate, from the plan sponsor) with respect to the demonstration to support a finding that the event lessens the risk of loss to plan participants and beneficiaries? Enter N/A if the event is not a contribution rate reduction, or if the event is a contribution rate reduction but the requested SFA is limited to the amount of SFA determined as if the event had not occurred.	Yes No N/A			N/A		Financial Assistance Application	Cont Rate Cert Plan Name CE
48.b.	Addendum A for Certain Events Section E	Does the demonstration in Checklist Item #48.a. also identify all assumptions used, supporting rationale for the assumptions and other relevant information? Enter N/A if the event is not a contribution rate reduction, or if the event is a contribution rate reduction but the requested SFA is limited to the amount of SFA determined as if the event had not occurred.	Yes No N/A		N/A - included in Cont Rate Cert Plan Name CE	N/A		N/A - included in Cont Rate Cert Plan Name CE	N/A - included in Cont Rate Cert Plan Name CE

Additional Information for Certain Events under § 4262.4(f) - Applicable Only to Any Mergers in § 4262.4(f)(1)(ii)

Plans that have experienced mergers identified in § 4262.4(f)(1)(ii) must complete Checklist Items #49 through #62. If you are required to complete Checklist Items #49 through #62, your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #49 through #62. All other plans should not provide any responses for Checklist Items #49 through #62.

49.	Addendum A for Certain Events Section B, Item (1)a.	In addition to the information provided with Checklist Item #1, does the application also include similar plan documents and amendments for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Pension plan documents, all versions available, and all amendments signed and dated	N/A
50.	Addendum A for Certain Events Section B, Item (1)b.	In addition to the information provided with Checklist Item #2, does the application also include similar trust agreements and amendments for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Pension plan documents, all versions available, and all amendments signed and dated	N/A
51.	Addendum A for Certain Events Section B, Item (1)c.	In addition to the information provided with Checklist Item #3, does the application also include the most recent IRS determination for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Enter N/A if the plan does not have a determination letter.	Yes No N/A			N/A		Pension plan documents, all versions available, and all amendments signed and dated	N/A

Application to PBGC for Approval of Special Financial Assistance (SFA)

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-----Filers provide responses here for each Checklist Item:-----

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
52.	Addendum A for Certain Events Section B, Item (2)	In addition to the information provided with Checklist Item #4, for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii), does the application include the actuarial valuation report for the 2018 plan year and each subsequent actuarial valuation report completed before the application filing date?	Yes No			N/A	Identify here how many reports are provided.	Most recent actuarial valuation for the plan	YYYYAVR Plan Name Merged , where "Plan Name Merged" is abbreviated version of the plan name for the plan merged into this plan.
53.	Addendum A for Certain Events Section B, Item (3)	In addition to the information provided with Checklist Items #5.a. and #5.b., does the application include similar rehabilitation plan information for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Rehabilitation plan (or funding improvement plan, if applicable)	N/A
54.	Addendum A for Certain Events Section B, Item (4)	In addition to the information provided with Checklist Item #6, does the application include similar Form 5500 information for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Latest annual return/report of employee benefit plan (Form 5500)	YYYYForm5500 Plan Name Merged , "Plan Name Merged" is abbreviated version of the plan name for the plan merged into this plan.
55.	Addendum A for Certain Events Section B, Item (5)	In addition to the information provided with Checklist Items #7.a., #7.b., and #7.c., does the application include similar certifications of plan status for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A	Identify how many zone certifications are provided.	Zone certification	YYYYZoneYYYYMMDD Plan Name Merged, where the first "YYYY" is the applicable plan year, and "YYYYMMDD" is the date the certification was prepared. "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.
56.	Addendum A for Certain Events Section B, Item (6)	In addition to the information provided with Checklist Item #8, does the application include the most recent cash and investment account statements for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Bank/Asset statements for all cash and investment accounts	N/A
57.	Addendum A for Certain Events Section B, Item (7)	In addition to the information provided with Checklist Item #9, does the application include the most recent plan financial statement (audited, or unaudited if audited is not available) for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Plan's most recent financial statement (audited, or unaudited if audited not available)	N/A
58.	Addendum A for Certain Events Section B, Item (8)	In addition to the information provided with Checklist Item #10, does the application include all of the written policies and procedures governing the plan's determination, assessment, collection, settlement, and payment of withdrawal liability for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Are all such items included in a single document using the required filenaming convention?	Yes No			N/A		Pension plan documents, all versions available, and all amendments signed and dated	WDL Plan Name Merged , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20221129p

APPLICATION CHECKLIST

Plan name:	Bindery Industry Employers GCC/IBT Pension Plan
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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
59.	Addendum A for Certain Events Section B, Item (9)	In addition to the information provided with Checklist Item #11, does the application include documentation of a death audit (with the information described in Checklist Item #11) for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No					Pension plan documents, all versions available, and all amendments signed and dated	<i>Death Audit Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.
60.	Addendum A for Certain Events Section C, Item (1)	In addition to the information provided with Checklist Item #13, does the application include the same information in the format of Template 1 for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Enter N/A if each plan that fully merged into this plan is not required to respond Yes to line 8b(1) on the most recently filed Form 5500 Schedule MB.	Yes No N/A					Financial assistance spreadsheet (template)	<i>Template 1 Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.
61.	Addendum A for Certain Events Section C, Item (2)	In addition to the information provided with Checklist Item #14, does the application include the same information in the format of Template 2 (if required based on the participant threshold) for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Enter N/A if each plan that merged into this plan has less than 10,000 participants on line 6f of the most recently filed Form 5500.	Yes No N/A					Contributing employers	<i>Template 2 Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name fore the plan merged into this plan.
62.	Addendum A for Certain Events Section C, Item (3)	In addition to the information provided with Checklist Item #15, does the application include similar information in the format of Template 3 for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)?	Yes No					Historical Plan Financial Information (CBUs, contribution rates, contribution amounts, withdrawal liability payments)	<i>Template 3 Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.

BINDERY INDUSTRY
EMPLOYERS GCC/IBT
PENSION FUND

Financial Statements
Supplemental Schedules
and
Independent Auditor's Report
For the Years December 31, 2021 and 2020

* * * * *

BINDERY INDUSTRY EMPLOYERS GCC/IBT

PENSION FUND

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INDEPENDENT AUDITOR'S REPORT

To the Board of Trustees
Bindery Industry Employers GCC/IBT
Pension Fund
Horsham, Pennsylvania

Opinion

We have audited the accompanying financial statements of Bindery Industry Employers GCC/IBT Pension Fund, an employee benefit plan subject to the Employee Retirement Income Security Act of 1974 (ERISA), which comprise the statements of net assets available for benefits as of December 31, 2021 and 2020, and the related statement of changes in net assets available for benefits for the years then ended, and the related notes to the financial statements.

In our opinion, the financial statements referred to above present fairly, in all material respects, the net assets available for benefits of Bindery Industry Employers GCC/IBT Pension Fund as of December 31, 2021 and 2020, and the changes in its net assets available for benefits for the years then ended, in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the plan and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the plan's ability to continue as a going concern within one year after the date that the financial statements are available to be issued.

Management is also responsible for maintaining a current plan instrument, including all plan amendments; administering the plan; and determining that the plan's transactions that are presented and disclosed in the financial statements are in conformity with the plan's provisions, including maintaining sufficient records with respect to each of the participants, to determine the benefits due or which may become due to such participants.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements, including omissions, are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the plan's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the plan's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.

Supplemental Schedules

Our audits were conducted for the purpose of forming an opinion on the financial statements as a whole. The supplemental schedule of administrative expenses is presented for purposes of additional analysis and is not a required part of the financial statements. The supplemental schedule of assets held at end of year and reportable transactions are presented for the purpose of additional analysis and are not a required part of the basic financial statements but is supplementary information required by the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974. Such information is the responsibility of the plan's management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with generally accepted auditing standards.

In forming our opinion on the supplemental schedules, we evaluated whether the supplemental schedules, including their form and content, are presented in conformity with the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA.

In our opinion, the information in the accompanying schedules is fairly stated, in all material respects, in relation to the financial statements as a whole, and the form and content are presented in conformity with the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA.


Fischer Dorwart, P.C.

October 14, 2022

**BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
STATEMENT OF NET ASSETS AVAILABLE FOR BENEFITS
DECEMBER 31, 2021 AND 2020**

	2021	2020
Assets:		
Investments at Fair Value		
Mutual Funds	\$ 35	\$ 36
Cash and Equivalents	456,763	468,966
Total Investments at Fair Value	<u>456,798</u>	<u>469,002</u>
Receivables:		
Accrued Income	3	4
Employer Contributions	3,065	3,137
Total Receivables	<u>3,068</u>	<u>3,141</u>
Other Asset:		
Prepaid Expenses	1,064	792
Total Assets	<u>460,930</u>	<u>472,935</u>
Liabilities:		
Accrued Expenses	22,302	36,223
Total Liabilities	<u>22,302</u>	<u>36,223</u>
Net Assets Available for Benefits	<u>\$ 438,628</u>	<u>\$ 436,712</u>

The Accompanying Notes are an Integral
Part of the Financial Statements

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS
FOR THE YEARS DECEMBER 31, 2021 AND 2020

	2021	2020
Additions to Net Assets Attributed to:		
Investment Income:		
Net Appreciation in Fair Value of Investments	\$ 23	\$ 301
Interest & Dividends	62	944
Totals	85	1,245
Less: Investment Advisory Fees	-	-
Net Investment Income	85	1,245
Employer Contributions	36,064	40,756
Pension Benefit Guaranty Corporation Funding	1,372,000	1,416,200
Total Additions	1,408,149	1,458,201
Deductions from Net Assets Attributed to:		
Benefits Paid Directly to Participants	1,288,240	1,290,005
Administrative Expenses	117,993	168,414
Total Deductions	1,406,233	1,458,419
Net Change in Net Assets Available for Benefits	1,916	(218)
Net Assets Available for Benefits:		
Beginning of Year	436,712	436,930
End of Year	\$ 438,628	\$ 436,712

The Accompanying Notes are an Integral
Part of the Financial Statements

BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND

NOTES TO FINANCIAL STATEMENTS

1. DESCRIPTION OF THE PLAN

The following brief description of the Bindery Industry Employers GCC/IBT Pension Plan (Plan) is provided for general information purposes only. Participants should refer to the Plan agreement for more complete information.

General

The Plan is a multiemployer defined benefit pension plan covering all eligible members of the Graphic Communications Conference of the International Brotherhood of Teamsters Union Local 14-M and the former Graphic Communications Conference of the International Brotherhood of Teamsters Union Local 4-C pursuant to various collective bargaining agreements. The Plan sponsor and Plan administrator is the Bindery Industry Employers GCC/IBT Pension Plan Board of Trustees. The Board of Trustees is composed of two trustees, one designated by the employers and one designated by the Union as their representatives in accordance with the Agreement and Declaration of Trust. The Board of Trustees has overall responsibility for the operation and administration of the Plan. The Plan is subject to the provisions of the Employee Retirement Income Security Act of 1974 (ERISA). Participation normally begins after the completion of one year of service.

Vesting

Effective January 1, 1999, the following vesting schedule applies to any participant who completes an hour of service on or after January 1, 1999: less than 5 years of service, 0%; 5 or more years of service, 100%. A participant in the Plan whose termination of employment date is prior to January 1, 1999 is subject to the vesting schedule in effect as of the date of termination of employment.

Pension Benefits

If a participant's last day of covered employment is on or after January 1, 2001, his accrued monthly pension is equal to his credited service as of such date multiplied by \$14.00. If a participant's last day of covered employment is prior to January 1, 2001, his accrued monthly pension is equal to his credited service as of such date multiplied by the benefit rate(s) in effect on such date. For retirements on or after January 1, 2011, pension benefits are payable monthly in the normal form of a life annuity for single participants. Participants who are married at retirement will receive reduced benefits in a joint and 50% survivor annuity form unless another option is elected. A participant's normal retirement age is the later of the date on which he attains age 65, or the fifth anniversary of the date participation commenced. A terminated participant who is eligible for a deferred vested monthly pension is eligible for early retirement after attaining age 55. The early retirement benefit is the normal monthly benefit accrued as of the early retirement date reduced by 0.5% for each month that the early retirement date precedes the normal retirement date.

Pre-Retirement Death Benefits

Pre-Retirement Death Benefits are provided to eligible active or terminated vested participants who have completed 5 years of Vesting Service. For married participants, the benefit is in the form of a Qualified Pre-Retirement Survivor Annuity. If eligible for early retirement at death, the eligible spouse will receive a monthly benefit equal to 50% of the normal retirement pension

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

DESCRIPTION OF THE PLAN (Continued)

Pre-Retirement Death Benefits (Continued)

computed as of the date of death, reduced for early commencement as if the participant had retired the day before his death and further reduced as if the participant had elected the joint and 50% survivor annuity option. If younger than early retirement age at death, the benefit will be determined as of the date of death but reduced as if he had retired at the earliest retirement age. This benefit begins on the first day of the month following the later of the participant's death or the month the participant would have attained early retirement age and continues for the surviving spouse's lifetime. For non-married participants who die prior to April 1, 2020 with 5 years of contributory service, the death benefit is a lump sum benefit based on a formula that incorporates the actual years of employer contributions to the Plan for such participant. The maximum single sum payable is \$5,512.50, subject to any restrictions under Code Section 432(f)(2).

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting

The accompanying financial statements are prepared on the accrual basis of accounting.

Investment Valuation and Income Recognition

The Plan's investments are stated at fair value. Purchase and sales of securities are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date. Net appreciation (depreciation) in value includes the Plan's realized gains and losses on investments bought and sold as well as held during the year.

Employer Receivables

Contributions due and not paid prior to the year end are recorded as contributions receivable. Allowance for uncollectible accounts is considered unnecessary and is not provided.

Funding Policy

The Plan benefits are funded by contributions from the participating employers pursuant to the applicable collective bargaining agreements. No employee contributions are required.

Financial assistance amounts received from the PBGC are recorded as income when received.

Actuarial Present Value of Accumulated Plan Benefits

Accumulated plan benefits are those future periodic payments, including lump-sum distributions, that are attributable under the Plan's provisions to the service which employees have rendered. Accumulated plan benefits include benefits expected to be paid to (a) retired or terminated employees or their beneficiaries, (b) beneficiaries of employees who have died, and (c) present employees or their beneficiaries.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

Risks and Uncertainties

The Plan utilizes various investment instruments which are exposed to various risks, such as interest rate, credit, and overall market volatility. Due to the level of risk associated with certain investment securities, it is reasonably possible that changes in the values of investment securities will occur in the near term and that such changes could materially affect the amounts reported in the financial statement. The Plan's investments are not insured or protected by the Plan's Trustee, the Pension Benefit Guaranty Corporation, or any other governmental agency; accordingly, the Plan is subject to the normal investment risks associated with money market funds, mutual funds, stocks, bonds, and other similar types of investments.

Subsequent Events

Management has evaluated events and transactions occurring subsequent to December 31, 2021 for items that should potentially be recognized or disclosed in these financial statements. The evaluation was conducted through October 14, 2022, the date these financial statements were available for issue.

3. PRIORITIES UPON TERMINATION

It is the intent of the Trustees to continue the Plan in full force and effect; however, the right to discontinue the Plan is reserved to the Trustees. Termination shall not permit any part of the Plan assets to be used for or diverted to purposes other than the exclusive benefit of the pensioners, beneficiaries, and participants. In the event of termination, the net assets of the Plan will be allocated to pay benefits in priorities as prescribed by ERISA and its related regulations.

Whether or not a particular participant will receive full benefits should the Plan terminate at some future time will depend on the sufficiency of the Plan's net assets at that time and the priority of those benefits.

In addition, certain benefits under the Plan are insured by the PBGC if the Plan terminates. Generally, the PBGC guarantees most vested normal age retirement benefits, early retirement benefits, and certain disability and survivor's pensions. However, the PBGC does not guarantee all types of benefits under the Plan, and the amount of benefit protection is subject to certain limitations. Vested benefits under the Plan are guaranteed at the level in effect on the date of the Plan's termination, subject to a statutory ceiling or the amount of an individual's monthly benefit. Therefore, a participant may receive less than 100% of his vested benefit should the Plan terminate and be subject to the PBGC guarantee.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

4. TAX STATUS

The Plan obtained its latest determination letter on August 17, 2015, in which the Internal Revenue Service stated that the Plan, as then designed, was in compliance with the applicable requirements under Section 401(a) of the Internal Revenue Code and was, therefore, exempt from federal income taxes under the provisions of Section 501(a). The Plan's administrator and the Plan's tax counsel believe that the Plan is currently designed and being operated in compliance with the applicable requirements of the Internal Revenue Code.

Accounting principles generally accepted in the United States of America require Plan management to evaluate tax positions taken by the Plan and recognize a tax liability if the Plan has taken an uncertain position that more likely than not would not be sustained upon examination by the Internal Revenue Service. The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax periods in progress.

5. FAIR VALUE MEASUREMENTS

ASC 820, *Fair Value Measurements and Disclosures*, establishes a framework for measuring fair value. The framework provides a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets (Level 1) and the lowest priority to unobservable inputs (Level 3). The Plan uses appropriate valuation techniques based on the available inputs to measure the fair value of its investments. When available, the Plan measures fair value using Level 1 inputs because they generally provide the most reliable evidence of fair value. Level 3 inputs were used only when Level 1 or Level 2 inputs were not available. An asset's level within the fair value hierarchy is based on the lowest level of input that is significant to the fair value measurement.

The three levels of the fair value hierarchy under ASC 820 are as follows:

- Level 1: Unadjusted quoted prices in active markets that are accessible at the measurement date for identical unrestricted assets.
- Level 2: Quoted prices in markets that are not active, or inputs that are observable either directly or indirectly, for substantially the full term of the asset.
- Level 3: Prices or valuation techniques that require inputs that are both significant to the fair value measurement and unobservable (i.e. supported with little or no market activity).

Following is a description of the valuation methodologies used for assets measured at fair value. There have been no changes in the methodologies used at December 31, 2021 and 2020:

Mutual funds are valued at the quoted net asset value ("NAV") of shares held by the Plan at year end.

Short-term investments, except for non-interest-bearing cash, are valued at their carrying value which approximates fair value based on their short-term maturity.

Investment securities measured at fair value on a recurring basis for which the plan has elected the fair value option, are summarized below as of December 31, 2021 and 2020:

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

5. FAIR VALUE MEASUREMENTS (Continued)

	Fair Value Measurements at Reporting Date Using:			
	Quoted Prices In Active Markets For Identical Assets (Level 1)	Significant Order Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)	Total Fair Value
<u>December 31, 2021</u>				
Mutual Funds	\$ 35	\$ -	\$ -	\$ 35
Cash and Equivalents	456,763	-	-	456,763
Total investments at fair value	<u>\$ 456,798</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 456,798</u>
 <u>December 31, 2020</u>				
Mutual Funds	\$ 36	\$ -	\$ -	\$ 36
Cash and Equivalents	468,966	-	-	468,966
Total investments at fair value	<u>\$ 469,002</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 469,002</u>

Gains and losses (realized and unrealized) included in changes in net assets available for benefits for the years ended December 31, 2021 and 2020, are included in net appreciation in fair value of investments.

6. ACTUARIAL INFORMATION

Accumulated plan benefits are those future periodic payments, including lump sum distributions that are attributable under the Plan's provisions to the service employees have rendered. Accumulated plan benefits include benefits expected to be paid to (a) retired or terminated employees or their beneficiaries, (b) beneficiaries of employees who have died, and (c) present employees or their beneficiaries. Benefits payable are included to the extent they are deemed attributable to employee service rendered to the valuation date. The actuarial present value of the accumulated plan benefits is determined by an independent actuary and is that amount that results from applying actuarial assumptions to adjust the accumulated plan benefits to reflect the time value of money (through discounts for interest) and the probability of payment (by means of decrements such as for death, disability, withdrawal, or retirement) between the valuation date and expected date of payment.

The computations of the actuarial present value of accumulated plan benefits as presented in these notes were made as of January 1, 2021. Had the valuation been performed as of December 31, 2020, there would be no material difference.

The following actuarial assumptions are based on the presumption that the Plan will continue. Were the Plan to terminate, different actuarial assumptions and other factors might be applicable in determining the actuarial present value of accumulated plan benefits.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

6. ACTUARIAL INFORMATION (Continued)

The significant actuarial assumptions used in the valuation as of January 1, 2021 (presented below as of December 31, 2020) were: (a) Pre-retirement mortality: RPH-2014 Blue Collar Employee Mortality Table with a one-year setback, (b) Post-retirement (not disabled): RPH-2014 Blue Collar Healthy Annuitant Mortality Table with a one-year set forward, (c) Marriage assumption: 80% of active and terminated vested participants are married with females assumed to be three years younger than males, (d) Terminated vested participants: Those over age 70 are assigned a 50% probability of collecting their benefits, (e) Disabled lives mortality: 150% of the RPH-2014 Disabled Retiree Mortality Table, (f) Investment return: 1.69% for 20 years and 1.66% thereafter, (g) Asset valuation method: actuarial smoothing method, (h) Withdrawal and retirement rates: age based rates based on experience studies, (i) Actuarial cost method: entry age normal, and (j) Administrative expense: \$150,000 annually.

The actuarial present value of accumulated plan benefits as of December 31, 2020 is as follows:

Actuarial present value of accumulated plan benefits:

Vested benefits:	
Participants and beneficiaries currently receiving benefits	\$ 14,280,687
Terminated vested participants	6,522,305
Active participants	<u>701,544</u>
	21,504,536
Nonvested benefits	<u>3,844</u>
Total actuarial present value of accumulated plan benefits	<u>\$ 21,508,380</u>

As reported by the actuary, the changes in the present value of accumulated plan benefits during the year ended December 31, 2020 were as follows:

Actuarial present value of accumulated plan benefits at beginning of year	<u>\$ 21,351,518</u>
Increase (decrease) during the year attributable to:	
Plan amendment*	(785,948)
Interest	438,978
Benefits paid	(1,290,005)
Benefits accumulated, including experience (gains) losses	585,258
Change in actuarial assumptions (a)	<u>1,208,579</u>
Net increase	<u>156,862</u>
Actuarial present value of accumulated plan benefits at end of year	<u>\$ 21,508,380</u>

* For valuation purposes, benefits were reduced to the PBGC maximum guaranteed benefit level effective April 1, 2020, the date of the plan's insolvency.

(a) The assumed interest rate was reduced from 2.12% for 20 years and 2.26% thereafter to 1.69% for 20 years and 1.66% thereafter. The assumed annual administrative expenses were increased from \$125,000 to \$150,000.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

7. CONCENTRATIONS

The Plan's participating employees and the Plan's participating employers are concentrated in the Philadelphia Pennsylvania area. They are also in an industry that has experienced significant reductions in active employees and active employers in the region.

8. FUNDING STATUS OF THE PLAN

ERISA imposes a minimum funding standard that requires the Plan to maintain a Funding Standard Account. Contributions meet the legal requirement on a cumulative basis if that account shows no deficiency. The accumulation of the actual contributions in excess of the minimum required contributions under ERISA is called the credit balance; whereas should contributions fall below the minimum levels, a funding deficiency results. The minimum funding requirements of ERISA were not met for 2021 and 2020. However, the Plan is not required to meet minimum funding requirements for years the Plan is in critical status as long as the Plan adopts a Rehabilitation Plan and complies with such Rehabilitation Plan.

The Pension Protection Act of 2006 (PPA) amended ERISA and the Internal Revenue Code to, among other things, impose additional funding rules for multiemployer plans with the goal of improving the financial condition of these plans. PPA also developed status categories based on a plan's funding level. The Plan's actuary is required to annually certify to the Secretary of the Treasury and the Plan's Board of Trustees. The Multiemployer Pension Reform Act of 2014 created a new status for underfunded plans called "Critical and Declining Status". The Plan's actuary has certified that the Plan is in Critical and Declining Status because it is below the minimum funding level and there is a projected insolvency within 20 years. The Plan's actuary projected that it will become insolvent in 2020.

A plan certified to be in Critical and Declining Status shall not emerge from that status until the plan is certified to no longer be in critical status and the plan is projected to avoid insolvency. A plan in Critical and Declining Status also is required to disclose the plan's projected date of insolvency, a statement that benefit reductions are possible, and whether the trustees have taken actions to avoid insolvency.

Plans in Critical or Critical and Declining Status must 1) develop a rehabilitation plan to stabilize the plan's funding status, 2) present the bargaining parties with one or more schedules of contribution increases and/or benefit reductions, and 3) impose temporary surcharges on contribution rates for contributing employers pending their adoption of a rehabilitation plan. In November 2010, the Board of Trustees adopted a Rehabilitation Plan that increased employer contribution rates and eliminated adjustable benefits. A revised Rehabilitation Plan was adopted in December 2012 and amended in December 2014 and October 2017 with the expectation of delaying insolvency. The Plan has made scheduled progress with the amended Rehabilitation Plan. The Rehabilitation Plan ended upon the Plan becoming insolvent on April 1, 2020.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

9. WITHDRAWAL LIABILITY

One of the two remaining employers closed on December 30, 2019. All active employee participants terminated that day except for a few employees who were kept on to help with the shut-down process. The company filed for Chapter 11 bankruptcy on April 13, 2020. The remaining employees were terminated by May 31, 2020. This employer accounted for 80% of 2019 employer contributions to the Plan.

A demand letter for withdrawal liability in the amount of \$10,611,992 was sent on May 20, 2020 and a proof of claim for the withdrawal liability was filed for the court. The ultimate realization of withdrawal liability assessments is not reasonably estimable. The Plan recognizes withdrawal liability income only when received and/or any pending arbitration and litigation have been settled.

10. INSOLVENCY AND THE PENSION BENEFIT GUARANTY CORPORATION

The Plan became insolvent in April 2020. In accordance with PBGC regulations, the Plan submitted the Application for Financial Assistance to PBGC. On March 13, 2020 the Trustees signed the PBGC Promissory Note and Security Agreement. Effective April 1, 2020, PBGC began providing financial assistance to the Plan, and during the year ended December 31, 2021 and 2020, the Plan received \$1,372,000 and \$1,416,200, respectively.

Amounts received from the PBGC are recognized as an addition to net assets in the period received. Supplemental funding provided by PBGC is technically a loan. However, due to the circumstances, repayment is considered no more than a contingency and no liability has been recorded. The ability of the Plan to continue operations and to pay benefits is dependent on PBGC continuing to provide financial assistance.

In the event that the Plan becomes solvent, the amount owed to PBGC (including interest) would be \$2,866,106 as of December 31, 2021.

The Plan is planning to file an application for Special Financial Assistance under the American Rescue Plan Act of 2021 (ARPA) in the Plan year beginning January 1, 2022.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
SCHEDULE OF ADMINISTRATIVE EXPENSES
FOR THE YEARS DECEMBER 31, 2021 AND 2020

	<u>2021</u>	<u>2020</u>
Administrative Expenses:		
Administrative Fee	\$ 39,500	\$ 37,367
Actuarial and Consulting Services	10,480	50,952
Insurance Expense	7,462	8,275
Accounting	12,500	12,500
Legal	35,770	45,654
PBGC Premium	-	-
Bank Trustee Fees	9,143	9,600
Miscellaneous	3,138	4,066
Total Administrative Expenses	<u>\$ 117,993</u>	<u>\$ 168,414</u>

The Accompanying Notes are an Integral
Part of the Financial Statements

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
EIN: 23-6209755, PLAN #001
SCHEDULE OF ASSETS HELD AT END OF YEAR
FORM 5500, SCHEDULE H, PART IV, ITEM 4(i)
DECEMBER 31, 2021

(a)	(b)	(c)		(d)	(e)
Identity of issue, borrower, lessor or similar party	Description of investment, maturity date, rate of interest, number of shares	Historical Cost	Current Value		
<u>Cash and Equivalents:</u>					
First American Gov't Obligation Fund	Cash and Equivalents	456,763	Shares	\$ 456,763	\$ 456,763
<u>Mutual Funds:</u>					
PGIM Total Return Bond Fund	Mutual Fund	2	Shares	<u>36</u>	<u>35</u>
Total Assets Held for Investment Purposes				<u>\$ 456,799</u>	<u>\$ 456,798</u>

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
EIN: 23-6209755, Plan #001
SCHEDULE OF REPORTABLE TRANSACTIONS*
FORM 5500, SCHEDULE H, PART IV, ITEM 4(j)
DECEMBER 31, 2021

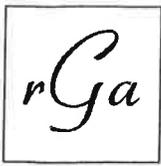
(a) Party Involved	(b) Description of asset	(c) Purchase Price	(d) Selling Price	(e) Lease rental	(f) Expense incurred	(g) Cost of Asset	(h) Current Value	(i) Net Gain (Loss)
<u>Category 3 - Series of Transactions Exceeds 5% of Value</u>								
	First American Gov't Obligation Fund	1,405,713		-	-		1,405,713	
	First American Gov't Obligation Fund		1,417,658	-	-	1,417,658	1,417,658	-

*Represents a transaction or a series of transactions in securities of the same issue in excess of 5% of the plan assets as of December 31, 2020.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**Actuarial Valuation
as of January 1, 2018**

richard Gabriel associates
Employee Benefits Consultants and Actuaries



richard Gabriel associates

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601 Dresher Road, Suite 201

Horsham, Pennsylvania 19044-2203

September 25, 2018

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
601 Dresher Road, Suite 201
Horsham, PA 19044

Dear Board of Trustees:

This letter presents the results of our actuarial valuation of the Bindery Industry Employers GCC/IBT Pension Plan as of January 1, 2018. The valuation was based on the plan provisions in effect on that date.

The draft financial data was provided by the plan's auditor and the basic participant data by the plan administrator. The actuarial values were calculated by us on the basis of this data, our interpretation of the plan provisions, and the actuarial assumptions as disclosed in Appendix A. Highlights of the valuation appear in the Executive Summary.

The actuarial experience of the plan since the last valuation was more favorable than anticipated by the actuarial assumptions, producing a net actuarial gain of \$80,329. A gain of approximately \$47,000 was attributable to favorable asset performance in 2017, on an actuarial value basis. The plan assets earned 9.1% in 2017 on an actuarial value basis and 15.2% on a market value basis, compared to the assumed rate of return of 7.5%. A small liability gain occurred due to more than expected deaths and census refinements.

In order to better reflect actual experience of the plan and reasonable future expectations, we have made one change to the actuarial assumptions:

- The assumed interest rate was reduced from 7.5% to 7.0%.

This change increased the unfunded accrued liability by \$604,140.

The minimum required contribution has increased from \$5,657,556 in 2017 to \$7,292,025 in 2018 due to the plan's accumulated funding deficiency. The funding deficiency has increased from \$3,938,242 as of December 31, 2016 to \$5,448,555 as of December 31, 2017. The maximum deductible contribution is \$30,920,458 for the 2018 plan year.

The expected contributions of \$192,275 for the 2018 plan year are insufficient to meet the minimum funding requirements. Since the plan is in critical and declining status, the 5% penalty tax under IRC Section 4971(a)(2) is not applicable as long as the plan is operating under a rehabilitation plan. However, per IRC Section 4971(g)(3)(B), the IRS may impose a penalty tax on the accumulated funding deficiency if a plan does not make scheduled progress under a rehabilitation plan for a 3-consecutive year period. Due to the favorable

asset performance in 2017 on a market value basis, the projected insolvency date was postponed to June 2020 based on the information used for the actuarial zone status certification as of January 1, 2018. With the projected insolvency date now later than May of 2020 (the projected insolvency date determined at the start of the rehabilitation period), the plan was certified as making scheduled progress under the Rehabilitation Plan for the 2017 plan year. In October 2017, the Trustees updated the Rehabilitation Plan amending the annual standard used for measuring the definition of scheduled progress effective January 1, 2017 such that scheduled progress is met if insolvency is projected not to occur before 2020. Based on projections of the January 1, 2018 valuation, insolvency is still projected to occur as of June 2020.

Since the plan is less than 65% funded, a funding deficiency has already occurred and insolvency is projected within 20 years, the plan status remains critical and declining for 2018. The goal of the current Rehabilitation Plan is to delay insolvency, which is expected to occur in 2020. Per Section 432(e)(3) of the Pension Protection Act of 2006, the Board of Trustees is required to annually review and update, as necessary, the Rehabilitation Plan. The Trustees should exhaust all reasonable measures (i.e., increase contribution levels and/or reduce benefits) to forestall possible insolvency.

A common measure of the level of funding of a pension plan is the ratio of the market value of plan assets to the value of accrued benefits. This ratio is 19.2% as compared to 24.9% on the last valuation. The decrease in this ratio occurred because the benefit payments are reducing the plan assets by a larger percentage than they reduce the liabilities. The above-mentioned assumption change caused a decline in this ratio of approximately 1%. The decline was partially offset by the favorable investment performance.

ACTUARIAL CERTIFICATION

The information and results contained in this actuarial valuation report as of January 1, 2018 were prepared for the use of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and its auditors. The actuarial computations made are for purposes of determining the plan's funding requirements and accounting disclosures under FASB Accounting Standards Codification 960 (ASC 960). The report has been prepared for the purposes outlined herein and should not be relied upon for any other purpose. Determinations for purposes other than meeting the plan's funding and financial accounting requirements may be significantly different than the results presented in this report. To avoid misrepresentation, the report is intended to be used in its entirety.

Our calculations were based upon the participant data as of December 31, 2017, as provided by the plan's administrator, and the draft financial data as of December 31, 2017 received from the plan's auditor. While the scope of our engagement did not call for us to perform an audit or independent verification of this information, we have reviewed this information for reasonableness. The accuracy of the results is dependent upon the

accuracy and completeness of the underlying information, which is the responsibility of those who supply the data.

The actuarial cost method and assumptions, other than those prescribed by law or regulations, are selected by the actuary. In our opinion, the actuarial methods used are appropriate for the purposes of the valuation, and each economic assumption (other than those prescribed by law or regulation) was selected from a range which represents our best estimate of anticipated experience under the plan. Furthermore, the demographic assumptions used, in the aggregate, are reasonable (taking into account the experience of the plan and reasonable expectations). In our opinion, the actuarial methods used are appropriate for purposes of the valuation and the actuarial assumptions used represent our best estimate of anticipated experience of this group.

Future actuarial measurements may differ significantly from current measurements presented in this report due to such factors as the following: plan experience different from that anticipated by the economic or demographic assumptions, changes in economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for these measurements (such as the end of an amortization period or additional cost or contribution requirements based on the plan's funded status) and changes in plan provisions, accounting standards or applicable law. Due to the limited scope of the actuary's assignment, the actuary did not perform an analysis of the potential range of such future measurements.

We certify this report has been prepared in accordance with generally accepted actuarial principles and practices and, to the best of our knowledge, fairly presents the actuarial position of the plan as of January 1, 2018. The actuary and the firm responsible for this report have no conflicts of interest that may impair the objectivity of our work. We further certify that we meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.

Sincerely,



Ronald C. Stokes
F.S.A., M.A.A.A.
Enrolled Actuary No. 17-05287

RCS/vmd

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

EXECUTIVE SUMMARY

A summary of the principal results of the current and preceding actuarial valuations follows:

	<u>January 1, 2018</u>	<u>January 1, 2017</u>
(A) Number of participants		
• Active	144	157
• Vested terminated	208	215
• Retired and disabled	<u>457</u>	<u>464</u>
• Total	809	836
(B) Normal cost	\$ 161,438	\$ 159,646
(C) Unfunded accrued liability at the beginning of the plan year	\$12,101,774	\$10,804,972
(D) Various contribution levels		
• Blended contribution rate per shift	\$ 5.67	\$ 5.66
• Expected contribution	\$ 192,275	\$ 214,605
• Actual contribution	To be determined	\$ 201,447
• Minimum required contribution as of the end of the plan year	\$ 7,292,025	\$ 5,657,556
• Maximum deductible contribution	\$30,920,458	\$28,795,074
• Amortization period	Infinite	Infinite
(E) Plan assets at the beginning of the plan year		
• Market value	\$ 2,756,882	\$ 3,475,390
• Actuarial value	\$ 2,654,904	\$ 3,545,783
(F) Value of accumulated plan benefits at the beginning of the plan year		
• Vested	\$14,340,921	\$13,927,599
• Nonvested	<u>13,758</u>	<u>13,345</u>
• Total	\$14,354,679	\$13,940,944
(G) Unfunded vested benefits	\$11,584,039	\$10,452,209
(H) Plan assets as a percentage of accumulated benefits		
• Market value	19.2%	24.9%
• Actuarial value	18.5%	25.4%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

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**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

I. PLAN ASSETS

(per draft audit)

(A) Statement of plan assets as of December 31, 2017 at market value

Cash and equivalents	\$ 147,257
Mutual funds - Equity	1,740,413
Mutual funds - Fixed income	867,831
Employers' contributions receivable	23,079
Accrued income	124
Prepaid expenses	<u>699</u>
Total assets	\$ 2,779,403
Administrative expenses payable	<u>(22,521)</u>
Net assets available for benefits	\$ 2,756,882

(B) Statement of changes in plan assets (market value)

Receipts	
Employers' contributions	\$ 201,447
Interest and dividends	64,539
Net realized and unrealized gains/(losses)	<u>389,454</u>
Total receipts	\$ 655,440
Disbursements	
Benefit payments	\$ 1,237,055
Administrative expenses	124,437
Investment expenses	<u>12,456</u>
Total disbursements	\$ 1,373,948
Net receipts	\$ (718,508)
Plan assets	
January 1, 2017	\$ 3,475,390
December 31, 2017	\$ 2,756,882

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Determination of actuarial value of assets as of January 1, 2018

(1)	Actuarial value of Fund assets at January 1, 2017	\$ 3,545,783
(2)	(1) x 1.075	\$ 3,811,717
(3)	Contributions to the Fund during year	\$ 201,447
(4)	Interest on (3) from date of payment to December 31, 2017 at 7.5% per annum*	\$ 7,554
(5)	Disbursements (excluding investment expenses)	\$ 1,361,492
(6)	Interest on (5) to December 31, 2017 at 7.5% per annum**	\$ 55,311
(7)	Expected actuarial value at December 31, 2017 = (2) + (3) + (4) - (5) - (6)	\$ 2,603,915
(8)	Market value of Fund assets at December 31, 2017	\$ 2,756,882
(9)	Difference between market value and expected actuarial value = (8) - (7)	\$ 152,967
(10)	Preliminary actuarial value of assets = (7) + 1/3 of (9)	\$ 2,654,904
(11)	(8) x 1.20	\$ 3,308,258
(12)	(8) x 0.80	\$ 2,205,506
(13)	Actuarial value of Fund assets at January 1, 2018 = (10), but not more than (11) or less than (12)	\$ 2,654,904

(D) Valuation assets

For purposes of this valuation, the actuarial value of plan assets in (C)(13) of \$2,654,904 is used.

(E) Asset returns

Rate of return on market value of plan assets (net of investment expenses)	15.2%
Rate of return on actuarial value of plan assets (net of investment expenses)	9.1%

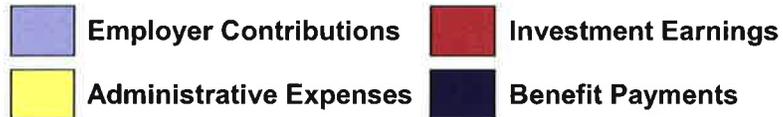
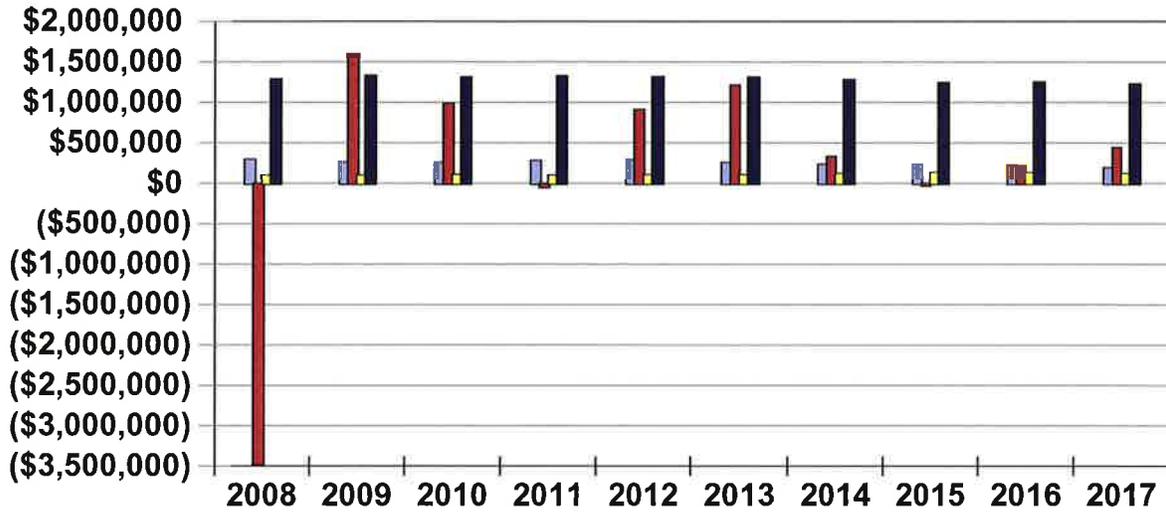
*Assumes that contributions occur on July 1, on average.

**Assumes disbursements are paid on the first day of the month.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART I

**HISTORY OF RECEIPTS AND DISBURSEMENTS
FOR PLAN YEARS ENDING DECEMBER 31**



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

II. UNFUNDED ACCRUED LIABILITY

(A)	Unfunded accrued liability as of January 1, 2017	\$ 10,804,972
(B)	Normal cost for the plan year (with expenses)	\$ 159,646
(C)	Interest on (A) and (B) for one year	\$ 822,346
(D)	Contributions on account of the plan year	\$ 201,447
(E)	Interest on (D) from the dates paid to the end of the plan year*	\$ 7,554
(F)	Expected unfunded accrued liability as of January 1, 2018 = (A) + (B) + (C) - (D) - (E)	\$ 11,577,963
(G)	Actual unfunded accrued liability as of January 1, 2018, before change	\$ 11,497,634
(H)	Actuarial gain (loss) = (F) - (G)	\$ 80,329
(I)	Change in unfunded accrued liability due to assumption change	\$ 604,140
(J)	Unfunded accrued liability as of January 1, 2018, after change = (G) + (I)	\$ 12,101,774

*Contributions are assumed paid on July 1, 2017, on average.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

III. FUNDING STANDARD ACCOUNT
(Plan year ending December 31, 2017)

(A)	Charges to Funding Standard Account	
(1)	Prior year funding deficiency	\$ 3,938,242
(2)	Normal cost for the plan year (with expenses)	159,646
(3)	Amortization charges (on \$7,790,960)	1,286,678
(4)	Interest on (1), (2) and (3)	<u>403,842</u>
(5)	Total charges	\$ 5,788,408
(B)	Credits to Funding Standard Account	
(1)	Prior year credit balance	\$ 0
(2)	Contributions for the plan year	201,447
(3)	Amortization credits (on \$924,230)	121,723
(4)	Interest on (1), (2) and (3)	16,683
(5)	Other (Full funding limitation credit)	<u>0</u>
(6)	Total credits	\$ 339,853
(C)	Credit balance (funding deficiency) as of December 31, 2017 = (B)(6) - (A)(5)	\$(5,448,555)

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IV. SUMMARY OF VALUATION RESULTS

All values shown are as of January 1, 2018

(A)	Normal cost (with expenses)	\$ 161,438
(B)	Accrued liability	
(1)	Present value of all benefits payable in future years:	
(a)	Active participants (144)	\$ 3,605,855
(b)	Vested terminated participants (208)	2,112,764
(c)	Retired participants (457)	<u>9,240,688</u>
(d)	Total (809)	\$ 14,959,307
(2)	Present value of future normal costs	\$ 202,629
(3)	Accrued liability = (1)(d) - (2)	\$ 14,756,678
(C)	Valuation assets	\$ 2,654,904
(D)	Unfunded accrued liability = (B)(3) - (C), but not less than zero	\$ 12,101,774

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

V. DEVELOPMENT OF CONTRIBUTION LEVELS

(A) The minimum required contribution to avoid a funding deficiency in the funding standard account for the 2018 plan year is determined as follows:

(1) Charges to Funding Standard Account	
(a) Prior year funding deficiency	\$ 5,448,555
(b) Normal cost for the plan year	161,438
(c) Amortization charges (on \$7,596,244)	1,332,824
(d) Interest on (a), (b) and (c)	<u>485,997</u>
(e) Total charges	\$ 7,428,814
(2) Credits to Funding Standard Account	
(a) Prior year credit balance	\$ 0
(b) Amortization credits (on \$943,025)	127,840
(c) Interest on (a) and (b)	8,949
(d) Other (Full funding limitation credit)	<u>0</u>
(e) Total credits	\$ 136,789
(3) Minimum required contribution to be made at the end of the plan year equals excess, if any, of (1)(e) over (2)(e)	\$ 7,292,025

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(B)	The maximum deductible contribution for the plan year ending December 31, 2018 is determined as follows:	
(1)	Normal cost for the plan year	\$ 161,438
(2)	10 year amortization of unfunded actuarial accrued liability	1,610,299
(3)	Interest on (1) and (2)	<u>124,022</u>
(4)	Total	\$ 1,895,759
(5)	Minimum required contribution = (A)(3)	\$ 7,292,025
(6)	Full funding limitation = (C)(3)	\$ 19,389,846
(7)	Tax deductible limit equals (4), but not less than (5), nor more than (6); or (C)(2)(e), if greater	\$ 30,920,458
(C)	Development of full funding limitation for maximum deductible purposes	
(1)	Based on accrued liability	
(a)	Accrued liability (including normal cost)	\$ 14,918,116
(b)	Applicable assets (lesser of actuarial or market value)	\$ 2,654,904
(c)	Full funding limitation at end of year = [(a) - (b)] x 1.07, but not less than zero	\$ 13,121,637
(2)	Based on 90% of RPA 94 current liability*	
(a)	Current liability projected to end of year	\$ 23,061,225
(b)	90% of (a)	\$ 20,755,103
(c)	Applicable assets projected to end of year	\$ 1,365,257
(d)	Full funding limitation = (b) - (c), but not less than zero	\$ 19,389,846
(e)	Unfunded current liability = [1.4 x (a)] - (c), but not less than zero	\$ 30,920,458
(3)	Full funding limit = greater of (1)(c) or (2)(d)	\$ 19,389,846

* Based on 2.98% interest, the RP-2014 Mortality Table with projected improvements for all healthy participants, the Revenue Ruling 96-7 table for disabled participants and other assumptions as described in Appendix A.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(D) Schedule of amortization bases

<u>Why Established</u>	<u>Date Established</u>	<u>Initial Amount</u>	<u>Outstanding Balance</u>	<u>Years Remaining</u>	<u>Charge (Credit)</u>
Initial base	1/1/1977	\$ N/A	\$ 861,240	4.0	\$ 237,628
Plan amendment	1/1/1985	N/A	42,923	2.0	22,187
Plan amendment	3/1/1985	N/A	42,629	2.2	20,165
Plan amendment	1/1/1988	N/A	671,948	5.0	153,161
Plan amendment	1/1/1989	N/A	140,146	6.0	27,479
Plan amendment	1/1/1991	N/A	156,385	8.0	24,476
Plan amendment	1/1/1992	N/A	433,524	9.0	62,187
Assumption change	1/1/1994	N/A	73,016	6.0	14,316
Plan amendment	1/1/1998	N/A	71,214	15.0	7,307
Plan amendment	1/1/2001	N/A	684,235	18.0	63,572
Actuarial loss	1/1/2002	N/A	90,918	4.0	25,086
Plan amendment	1/1/2002	N/A	287,890	19.0	26,032
Actuarial loss	1/1/2003	N/A	287,557	5.0	65,544
Actuarial loss	1/1/2004	N/A	62,391	6.0	12,233
Actuarial loss	1/1/2005	233,248	114,750	7.0	19,899
Actuarial loss	1/1/2006	336,011	186,666	8.0	29,215
Actuarial gain	1/1/2007	(91,813)	(34,830)	4.0	(9,610)
Actuarial gain	1/1/2008	(98,446)	(45,117)	5.0	(10,284)
Actuarial loss	1/1/2009	2,784,110	1,480,465	6.0	290,276
Actuarial loss	1/1/2010	75,068	45,043	7.0	7,811
Actuarial loss	1/1/2011	141,739	94,052	8.0	14,720
Plan amendment	1/1/2011	(202,795)	(134,571)	8.0	(21,062)
Actuarial loss	1/1/2012	232,919	168,316	9.0	24,144
Assumption change	1/1/2012	310,195	224,164	9.0	32,155
Actuarial loss	1/1/2013	102,851	79,978	10.0	10,642
Assumption change	1/1/2013	(70,724)	(54,996)	10.0	(7,318)
Actuarial gain	1/1/2014	(397,300)	(329,259)	11.0	(41,036)
Actuarial gain	1/1/2015	(151,251)	(132,543)	12.0	(15,596)
Assumption change	1/1/2015	694,920	608,965	12.0	71,654
Actuarial gain	1/1/2016	(142,718)	(131,380)	13.0	(14,691)
Actuarial loss	1/1/2017	87,021	83,689	14.0	8,943
Actuarial gain	1/1/2018	(80,329)	(80,329)	15.0	(8,243)
Assumption change	1/1/2018	604,140	<u>604,140</u>	15.0	<u>61,992</u>
Total			\$ 6,653,219		\$ 1,204,984

Notes:

- (1) Outstanding balances are shown as of January 1, 2018, before any payments on account of the plan year.
- (2) Net outstanding balance of \$6,653,219 less credit balance/(funding deficiency) of \$(5,448,555) equals unfunded accrued liability of \$12,101,774.
- (3) The years remaining for certain charge bases established on or before January 1, 2008 (including the initial base, actuarial losses and plan amendments) reflect the 5-year automatic extension effective January 1, 2008 approved by the IRS on March 18, 2009.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VI. ACTUARIAL PRESENT VALUE OF ACCUMULATED PLAN BENEFITS

(A) Actuarial Present Value of Accumulated Plan Benefits as of January 1, 2018

(1)	Vested benefits	
	(a) Retired participants and beneficiaries receiving payments (457)	\$ 9,240,688
	(b) Terminated vested participants (208)	2,112,764
	(c) Active participants (134)	<u>2,987,469</u>
	(d) Total (799)	\$ 14,340,921
(2)	Nonvested benefits (10)	<u>13,758</u>
(3)	Total accumulated plan benefits (809)	\$ 14,354,679
(4)	Plan assets (market value)	\$ 2,756,882
(5)	Unfunded vested benefits = (1)(d) - (4)	\$ 11,584,039
(6)	Plan assets as a percentage of the value of vested benefits = (4) ÷ (1)(d)	19.2%

(B) Change in Actuarial Present Value of Accumulated Plan Benefits

(1)	Actuarial present value of accumulated plan benefits as of January 1, 2017	\$ 13,940,944
(2)	Increase (decrease) during the year attributable to:	
	(a) Plan amendment	\$ 0
	(b) Change in actuarial assumptions	581,729
	(c) Benefits accumulated and actuarial gains/(losses)	69,880
	(d) Increase for interest due to the decrease in the discount period	999,181
	(e) Benefits paid	<u>(1,237,055)</u>
	(f) Net increase (decrease)	\$ 413,735
(3)	Actuarial present value of accumulated plan benefits as of January 1, 2018	\$ 14,354,679

Note: The present values shown above were calculated in accordance with Interpretations 1 and 2 of the American Academy of Actuaries. The assumed investment rate of return is 7.00%.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART II

COMPARISON OF LIABILITIES TO ASSETS FOR PLAN YEARS BEGINNING JANUARY 1

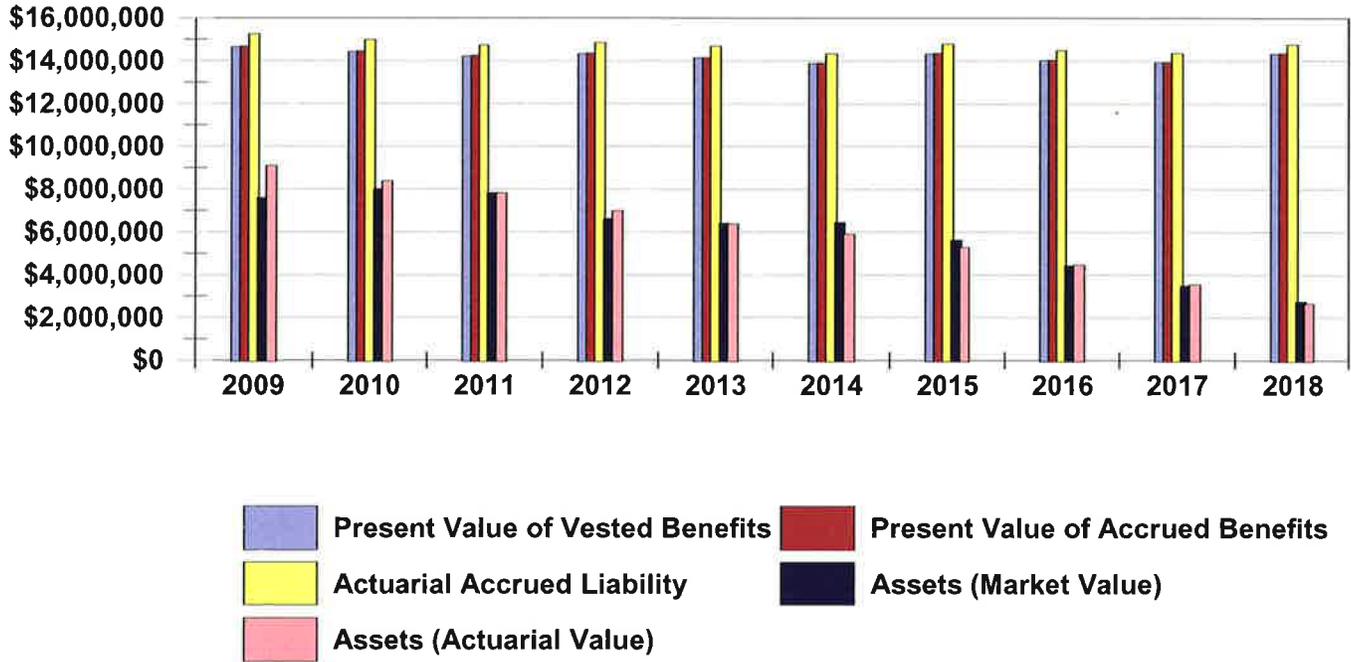
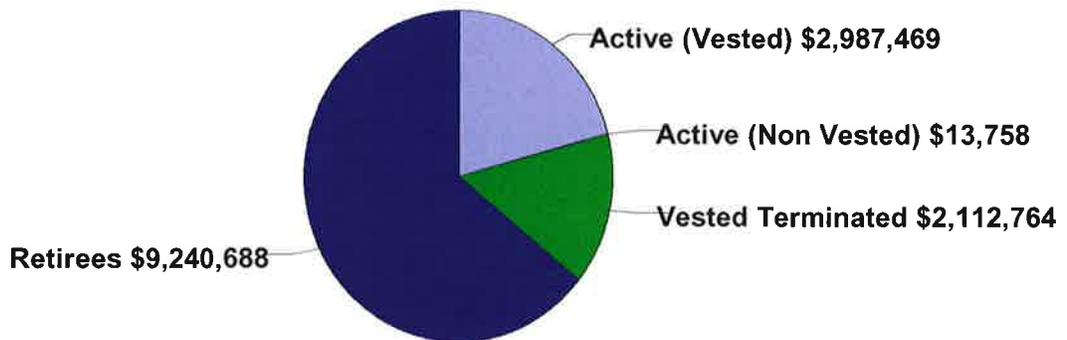


CHART III

BREAKDOWN OF PRESENT VALUE OF ACCUMULATED BENEFITS BY CATEGORY



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Unfunded Vested Benefits (Presumptive Method)

<u>Date</u>	<u>Vested Benefits Interest Rate</u>	<u>Value of Vested Benefits</u>	<u>Asset Value⁽¹⁾</u>	<u>Unfunded Vested Benefits⁽²⁾</u>
12/31/2000	8.0%	\$ 13,161,490	\$ 13,765,888	\$ (604,398)
12/31/2001	8.0%	13,729,764	12,855,490	874,274
12/31/2002	8.0%	13,966,603	11,234,306	2,732,297
12/31/2003	7.5%	14,352,701	12,245,649	2,107,052
12/31/2004	7.5%	14,617,090	12,500,580	2,116,510
12/31/2005	7.5%	14,525,963	12,170,594	2,355,369
12/31/2006	7.5%	14,482,705	12,569,788	1,912,917
12/31/2007	7.5%	14,391,719	12,337,060	2,054,659
12/31/2008	7.5%	14,644,094	7,591,676	7,052,418
12/31/2009	7.5%	14,419,795	8,014,810	6,404,985
12/31/2010	7.5%	14,402,684 ⁽³⁾	7,831,775	6,570,909
12/31/2011	7.5%	14,511,116 ⁽³⁾	6,626,197	7,884,919
12/31/2012	7.5%	14,306,141 ⁽³⁾	6,398,374	7,907,767
12/31/2013	7.5%	14,033,278 ⁽³⁾	6,451,692	7,581,586
12/31/2014 ⁽⁴⁾	7.5%	13,811,434 ⁽³⁾	5,618,297	8,193,137
12/31/2015	7.5%	14,171,573 ⁽³⁾	4,430,843	9,740,730
12/31/2016	7.5%	14,059,344 ⁽³⁾	3,475,390	10,583,954
12/31/2017	7.5%	13,881,391 ⁽³⁾	2,756,882	11,124,509

Employer Withdrawal Liability is expected for any employer who withdraws from the plan prior to January 1, 2019.

Notes:

- (1) Asset values are market values.
- (2) The amount of Unfunded Vested Benefits is obtained by subtracting the market value of the plan assets from the value of vested benefits determined using ongoing plan assumptions as outlined in Appendix A.
- (3) Includes the additional value of vested adjustable benefits as of January 1, 2011 of \$182,312. For withdrawal liability purposes, this amount is being amortized over 15 years.
- (4) Effective December 31, 2014, excludes effect of any assumption changes effective on the first day of the next plan year.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VII. PROJECTED PENSION PAYMENTS

<u>Year</u>	<u>Number of Recipients</u>	<u>Amount</u>
2018	459	\$ 1,295,000
2019	450	1,296,000
2020	439	1,295,000
2021	426	1,287,000
2022	412	1,285,000
2023	398	1,283,000
2024	382	1,270,000
2025	366	1,259,000
2026	350	1,231,000
2027	332	1,221,000

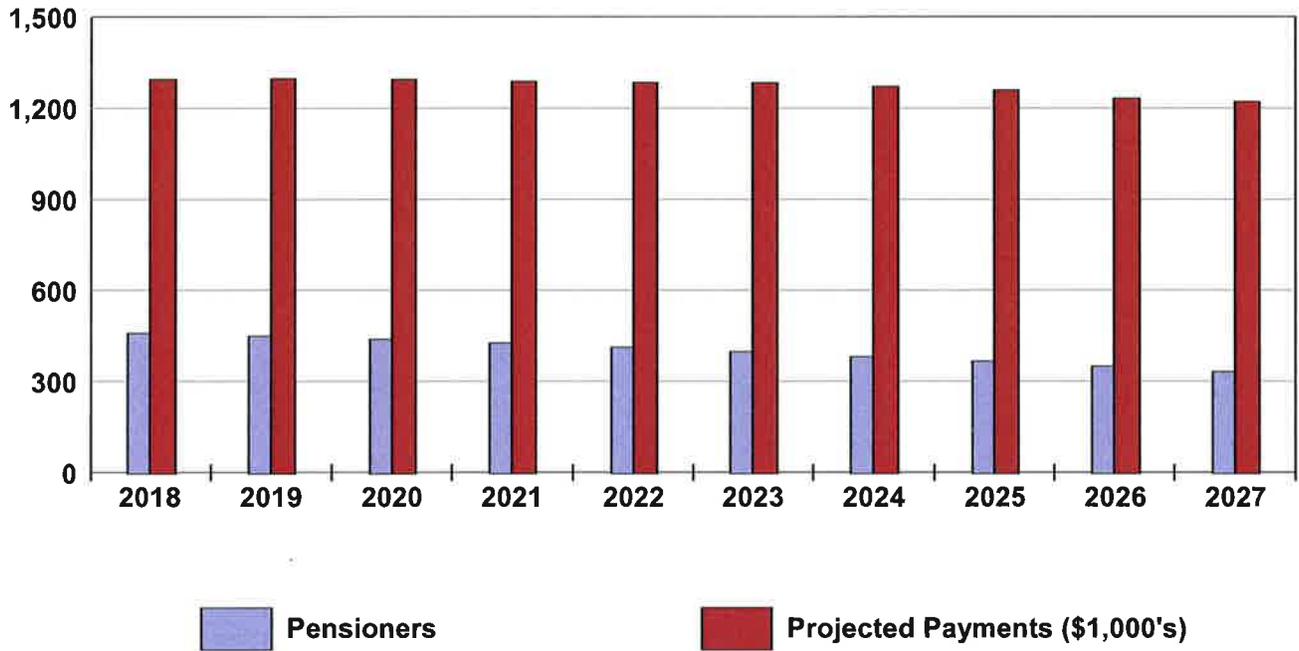
Notes:

- (1) Survivorship is based on the valuation assumptions.
- (2) For actives and those who have terminated with a vested deferred pension, this projection reflects only normal retirement pension benefits commencing at the normal retirement age. All current pension recipients are included.
- (3) No payments resulting from future terminations, disablements or deaths are reflected.
- (4) It is assumed that no future new entrants will be eligible for pension benefits during the next ten years.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART IV

PROJECTED PENSIONERS AND ANNUAL PENSION PAYMENTS



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VIII. PARTICIPANT DATA

**TABLE 1. DISTRIBUTION OF ACTIVE PARTICIPANTS
BY AGE AND SERVICE GROUPS**

Age Last Birthday	Completed Years of Credited Service									Total
	1-4	5-9	10-14	15-19	20-24	25-29	30-34	35-39	40+	
Under 25	1									1
25 - 29			1							1
30 - 34	1	4	1							6
35 - 39	2	3	2	2	1					10
40 - 44		1	2	1	4					8
45 - 49	3	3	1	4	2	4				17
50 - 54	2	3	4	4	1	6	1	1		22
55 - 59	2	1	3	9	3	4	1	7		30
60 - 64		2	1	5	3	8	1	6	9	35
65 - 69		1	1	2	1	1	1	1	4	12
70 & over				1		1				2
Total	11	18	16	28	15	24	4	15	13	144

Note: No active participant has less than one year of benefit service.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**TABLE 2. DISTRIBUTION OF INACTIVE PARTICIPANTS
BY AGE GROUP**

Terminated Vested Participants and Beneficiaries with Rights to Future Benefits

<u>Age Last Birthday</u>	<u>Number of Participants</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 30	2	\$ 148.40	\$ 74.20
30 - 34	1	68.60	68.60
35 - 39	11	1,439.20	130.84
40 - 44	12	1,631.00	135.92
45 - 49	29	4,277.23	147.49
50 - 54	48	8,018.63	167.05
55 - 59	52	10,950.03	210.58
60 - 64	29	5,524.38	190.50
65 & over	<u>24</u>	<u>3,075.67</u>	<u>128.15</u>
Total	208	\$35,133.14	\$168.91

Normal, Early & Disability Retirements and Beneficiaries

<u>Age Last Birthday</u>	<u>Number of Participants</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 55	3	\$ 387.23	\$129.08
55 - 59	15	1,903.84	126.92
60 - 64	37	6,850.08	185.14
65 - 69	71	17,800.24	250.71
70 - 74	73	19,309.85	264.52
75 - 79	99	26,249.77	265.15
80 - 84	76	17,416.98	229.17
85 - 89	49	8,701.99	177.59
90 & over	<u>36</u>	<u>4,296.66</u>	<u>119.35</u>
Total	459	\$102,916.64	\$224.22

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IX. SUMMARY OF PARTICIPANT DATA

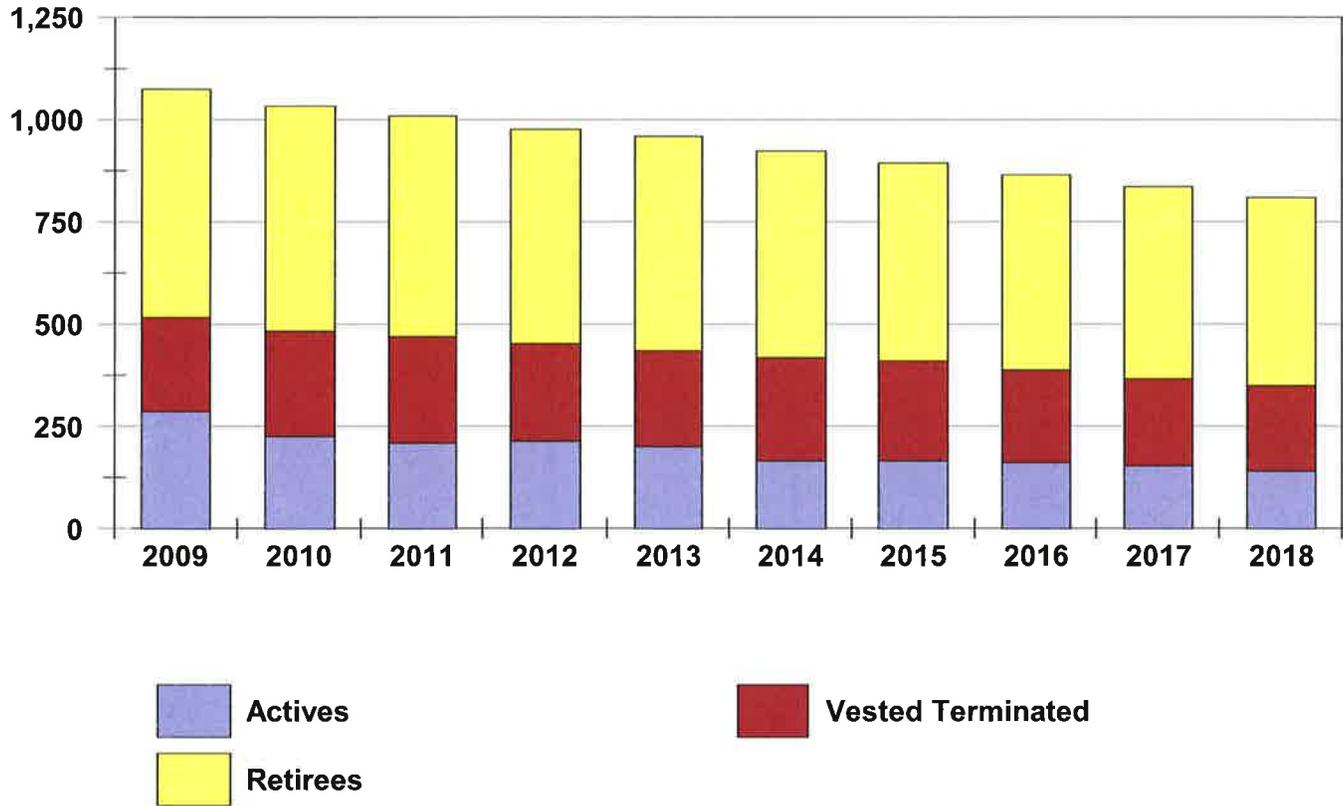
	<u>January 1, 2018</u>	<u>January 1, 2017</u>
(A) Active Participants		
(1) Number	144	157
(2) Average benefit service to date	21.5	20.3
(3) Average attained age	54.2	53.0
(4) Accrued annual pension		
(a) Total	\$ 490,806	\$ 501,894
(b) Average	\$ 3,408	\$ 3,197
(5) Projected annual pension		
(a) Total	\$ 729,920	\$ 789,056
(b) Average	\$ 5,069	\$ 5,026
(B) Vested terminated participants		
(1) Number	208	215
(2) Accrued annual pension		
(a) Total	\$ 413,985	\$ 442,905
(b) Average	\$ 1,990	\$ 2,060
(C) Disabled pensioners		
(1) Number	33	36
(2) Annual pension		
(a) Total	\$ 101,730	\$ 110,147
(b) Average	\$ 3,083	\$ 3,060
(D) Other pensioners and beneficiaries		
(1) Number	426	429
(2) Annual pension		
(a) Total	\$1,133,269	\$1,129,701
(b) Average	\$ 2,660	\$ 2,633

Note: One participant is both a retiree and a beneficiary. Another participant is both a terminated vested participant and a beneficiary. Two pensioners are alternate payees under a QDRO.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART V

PARTICIPANT CENSUS COMPARISON



	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
Actives	290	229	213	214	202	168	169	164	157	144
Vested Terminated	230	258	253	241	238	253	242	228	215	208
Retirees	554	546	538	521	519	502	484	472	464	457

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

X. RECONCILIATION OF CENSUS DATA

	<u>Actives</u>	<u>Terminated Vesteds</u>	<u>Retirees, Disabled Retirees and Beneficiaries*</u>	<u>Total</u>
Participants as of 1/1/2017	157	215	465	837
New participants	1	0	0	1
Reemployed participants	1	(1)	0	0
Nonvested terminations	(2)	0	0	(2)
Vested terminations	(7)	7	0	0
Retirements	(6)	(12)	18	0
Deaths with beneficiary	0	0	(2)	(2)
Deaths without beneficiary	0	0	(25)	(25)
Deaths with lump sum paid	0	(1)	0	(1)
New beneficiaries	0	0	2	2
Other (new QDRO Alternate Payee)	0	0	1	1
Benefits expired	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Participants as of 1/1/2018	144	208	459	811

*Retirees include two alternate payees under a qualified domestic relations order as of January 1, 2018 and one at January 1, 2017.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

ACTUARIAL METHODS AND ASSUMPTIONS

(A) Actuarial cost method

Entry age normal.

(B) Asset valuation method

Plan assets are valued using an actuarial smoothing method. Beginning with the January 1, 1995 plan year, the actuarial value of assets as of each valuation date is equal to the prior plan year's actuarial value adjusted to reflect contributions and disbursements, and then increased to reflect interest at the assumed investment rate. This value is then adjusted, up or down, by one-third of the difference between such value and the actual market value. In no event will the actuarial value of assets be less than 80% or more than 120% of the actual market value.

(C) Persons included

Based on data provided to us, all persons entitled to coverage under the plan as of the valuation date are included in the calculations.

(D) Significant actuarial assumptions

(1) Investment return

7.0% compounded annually, net of investment expenses.

(2) Retirement rates

<u>Age</u>	<u>Rate</u>
55 - 61	2%
62	15%
63	10%
64	10%
65	40%
66 - 69	33%
70	100%

Terminated vested participants are assumed to retire at age 65 or the valuation date, if later. Spouses of deceased terminated vested participants are assumed to retire when the participant would have attained age 65.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(3) Mortality

The following headcount-weighted RPH-2014 Mortality Tables (Male/Female) are used:

- (a) Pre-retirement - RPH-2014 Blue Collar Employee Mortality Table with a one-year setback to reflect expected mortality improvement.
- (b) Post-retirement

Not disabled: RPH-2014 Blue Collar Healthy Annuitant Mortality Table with a one-year setforward (formerly, prior to January 1, 2012, a two-year setforward) to reflect expected mortality improvement.

Disabled lives: 150% of the RPH-2014 Disabled Retiree Mortality Table.

(4) Withdrawal from service

- (a) Select rates are used in the first 5 years of service.

<u>Years of Service</u>	<u>Rate</u>
0	30%
1	20%
2	15%
3	15%
4	13%

- (b) After 5 years of service, turnover rates vary by attained age.

<u>Age</u>	<u>Rate</u>
25	8%
30	7%
35	7%
40	6%
45	6%
50	6%
55	3%
60	3%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(5) Disability

100% of the rates developed in a 1955 study of experience among several large industrial employee groups.

(6) Hours of work

It was assumed that each participant will work the same number of shifts in each future year that he worked in the most recent plan year.

(7) Allowance for other expenses

Administrative expenses payable from the trust are assumed to be covered by a \$125,000 addition to the normal cost.

(8) Expected employer contributions

Employees are assumed to work the same number of shifts in future years that they worked in the most recent plan year. At an annual rate of 33,911 shifts (the 2017 total for actives) and the blended contribution rate of \$5.67 per shift (\$5.50 for National and \$6.55 for all other employers), expected contributions are \$192,275 for 2018.

(9) Marriage

It was assumed that 80% of active and terminated vested participants are married with females assumed to be three years younger than males.

(10) Terminated vested participants

Terminated vested participants over age 70 are assigned a 50% probability of collecting their benefits.

(E) Data qualifications

If the date of birth was missing, the participant was assumed to be hired at age 30.

(F) Change in actuarial methods and assumptions

The actuarial methods and assumptions are the same as those used in the prior valuation, except that the assumed interest rate was decreased from 7.5% to 7.0%.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(G) Justification for changes in actuarial methods and/or assumptions

- The interest rate was reduced from 7.5% to 7.0% to reflect the currently low interest rates.
- Bond yields are currently low and rising interest rates will further depress the investment return on both stocks and bonds.
- Over the last 13 years, the average investment return on market value for this plan was 6.2%. On an actuarial value of assets, the average return was 5.7%. These average returns were increased by declining interest rates.
- Since the retirees account for more than 64% of the plan's liabilities, the liquidity of assets needed to pay the pension benefits will further depress investment returns.

(H) Basis for selection of demographic assumptions

Demographic assumptions are based on national tables, as periodically updated, which are determined by the actuary to be appropriate for this plan. In the case of assumptions for which the experience of the plan is credible, plan experience is used. For example, administrative expenses are determined from recent experience, per the plan audit. The retirement assumption is determined from plan experience. These assumptions are periodically adjusted in light of developing experience.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

PLAN SUMMARY

(A) Effective date and plan year

The effective date of the plan is January 1, 1962. As part of the Rehabilitation Plan, adjustable benefits were reduced effective January 1, 2011, including the change to the normal form of benefits from a five year certain and life annuity to a life annuity and the elimination of the disability benefit.

The plan year is the calendar year.

(B) Eligibility for coverage

An employee who is a member of an Eligible Employee Classification becomes a participant in the plan on the first day of the month coincident with or next following the completion of one year of service. Journeymen Bookbinders become participants on the date of covered employment.

(C) Employee contributions

None.

(D) Normal retirement date

The normal retirement date is the first day of the month coincident with or next following the later of the attainment of age 65 or the 5th anniversary of plan participation. A participant cannot retire prior to participating in the plan for at least 5 years.

(E) Employment after normal retirement date

If employment continues beyond the normal retirement date, pension payments will not commence until actual retirement. However, pension payments will commence no later than April 1 of the calendar year following the year in which the participant attains age 70-1/2, if employment continues beyond such date. Additional pension credits continue to accrue until the actual retirement date.

(F) Break in service

A temporary break in service occurs if less than 60 shifts are worked in two consecutive plan years and less than 52 shifts in at least one of them. No break shall occur, however, during periods of authorized leaves of absence, military service, sickness, accident or job-protected leave under the Family Medical Leave Act of 1993. A temporary break in service becomes a

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

permanent break in service when the period of temporary break equals or exceeds the greater of five years or credited service accumulated prior to the temporary break. A permanent break results in forfeiture of all credited service unless the participant has at least 5 years of vesting service.

(G) Credited service

Benefit accrual - one full year is credited for each plan year in which the participant is credited with at least 220 shifts. Fractional years are credited in years in which a participant works fewer than 220 shifts. Credited service is reduced by 1/10 for each 22 shifts less than 220 that the participant works in each plan year. No service credit is counted until a participant has completed two years of continuous service. Once two years of continuous service have been earned, service is retroactively credited.

Vesting - one year of Vesting Service is credited for each plan year in which at least 103 shifts (equivalent of 750 hours) are credited. No partial years are credited for vesting purposes.

(H) Normal retirement pension

- (1) Eligibility requirements - must be a participant at Normal Retirement Date and retire on or after that date.
- (2) Monthly pension - \$14.00 per month per year of Credited Service with no maximum on service.

(I) Early retirement pension

- (1) Eligibility requirements - must have reached age 55 with at least 5 years of Vesting Service.
- (2) Monthly pension - The normal retirement pension accrued to the early retirement date reduced by ½% for each month that the early retirement date precedes the Normal Retirement Date.

(J) Disability retirement pension

- (1) Effective for disability eligibility prior to January 1, 2011
 - (a) Eligibility requirements - must have at least 5 years of Credited Service. The disability must be total and permanent as defined in the plan and the participant must be entitled to a Social Security disability pension award.

**BINDERY INDUSTRY EMPLOYERS
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(b) Monthly pension - the normal retirement pension accrued to the date of disability, unreduced for early commencement and payable as of the effective date of the Social Security disability award.

(2) Effective January 1, 2011, the disability retirement pension is eliminated for participants who meet the eligibility requirements in (J)(1)(a) on and after January 1, 2011.

(K) Benefits payable on other termination of employment

(1) Eligibility requirements - must have completed 5 or more years of Vesting Service.

(2) Monthly pension - the normal retirement pension accrued to the date of termination reduced for early commencement as in (I)(2), if applicable.

(L) Pre-retirement death benefit

(1) Eligibility requirements - an active or terminated vested participant who has completed 5 years of Vesting Service.

(2) Nonmarried participant - lump sum payment equal to \$108 per year that contributions were made between January 1, 1962 and December 31, 1973, plus \$126 per year that contributions were made between January 1, 1974 and December 31, 1975 plus \$157.50 per year that contributions were made on and after January 1, 1976. The maximum single sum payable is \$5,512.50, subject to any restrictions under Code Section 432(f)(2).

(3) Married participant - If eligible for early retirement at death, the eligible spouse will receive a monthly benefit equal to 50% of the normal retirement pension computed as of the date of death, reduced for early commencement as if the participant had retired the day before his death. If younger than early retirement age at death, the benefit will be determined as of the date of death but reduced as if he had retired at the earliest retirement age and further reduced as if the participant had elected the continuation to the spouse under the 50% joint and survivor annuity. If the value of this benefit is less than the lump sum death benefit in (2) above, the excess will be paid to the surviving spouse in a lump sum.

Monthly payments commence on the first day of the month following the later of the participant's death or the month the participant would have attained early retirement age and will be payable during the surviving spouse's lifetime.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(M) Normal and optional forms of payment

(1) Normal form

- (a) Married participant - automatic surviving spouse annuity providing a reduced pension payable to the retired participant during his lifetime with 50% continuing monthly for the life of his surviving spouse after his death. This is automatic unless the participant elects otherwise with the consent of his spouse.
- (b) Single participant (for benefits commencing on or after January 1, 2011) - life annuity.

(2) Optional forms

- (a) 75% Joint and Survivor Annuity - a reduced amount of pension is payable to the retired participant during his lifetime with the provision that after his death 75% of such reduced benefit shall continue to and for the lifetime of his eligible surviving spouse.
- (b) Five Year Certain and Life Annuity (for benefits commencing on or after January 1, 2011) A reduced pension is payable to the retired participant during his lifetime, with the provision that if his death occurs before he has received 60 monthly payments, such payments will continue to his designated beneficiary until a total of 60 monthly payments have been made.

- (3) Lump sum - payable if the actuarially equivalent present value of the vested accrued benefit is \$2,500 or less.

(N) Suspension of benefits

The retirement benefit otherwise payable to a pensioner shall be permanently suspended for each calendar month in which the pensioner completes 40 or more hours of service in the bookbinding industry, in an occupation in which the pensioner was employed at any time under the plan, and in the geographic area covered by the plan (as defined in Department of Labor Regulations Section 2530.203-3) at the time payment of benefits to the pensioner commenced.

(O) Increases for retired participants

- (1) Effective October 1, 1987 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on October 1, 1987 received a 10% increase in his monthly benefit.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

- (2) Effective January 1, 1992 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 1992 received a 10% increase in his monthly benefit.
- (3) Effective January 1, 2002 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 2002 received a 5% increase in his monthly benefit.

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601 Dresher Road, Suite 201

Horsham, Pennsylvania 19044-2203

**ANNUAL MULTIEMPLOYER PLAN
ACTUARIAL STATUS CERTIFICATION
UNDER SECTION 432 OF THE INTERNAL REVENUE CODE**

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

Name, Address and Telephone Number of Plan Sponsor:

Board of Trustees
Bindery Industry Employers GCC/IBT Pension Plan
601 Dresher Road, Suite 201
Horsham, PA 19044
Telephone: (215) 773-0900

Plan Year of Certification: January 1, 2018 - December 31, 2018

Plan Status: Critical and declining

Actuarial Certification: This Actuarial Status Certification as of January 1, 2018 was prepared for the use of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and for IRS reporting purposes. The attached **Exhibit I** describes the scheduled progress in meeting the requirements of a funding improvement or rehabilitation plan, if applicable. The attached **Exhibits II and III** provide information supporting and qualifying the actuarial status determination.

The actuarial computations and projections made are for purposes of determining the Plan's actuarial status in accordance with Section 432 of the Internal Revenue Code and related IRS guidance and should not be relied upon for any other purpose. The attached **Exhibit IV** summarizes the data used and assumptions made for these actuarial computations and projections. Determinations for purposes other than determining the Plan's zone status may be significantly different.

Our calculations were based upon projections of the Plan's cost and liabilities determined from the January 1, 2017 actuarial valuation and the unaudited financial data as of December 31, 2017 received from the Plan's auditor and/or investment consultant. While the scope of our engagement did not call for us to perform an audit or independent verification of this information, we have reviewed this information for reasonableness. The accuracy of the valuation results is dependent upon the accuracy and completeness of the underlying information, which is the responsibility of those who supply the data.

The actuary and the firm responsible for this report have no conflicts of interest that may impair the objectivity of our work. Richard Gabriel Associates does not practice law and therefore, cannot and does not provide legal advice.

I am a member of the American Academy of Actuaries and I meet the Qualification Standards to render the actuarial opinion contained herein. I certify, to the best of my knowledge and belief, that this actuarial certification is complete and accurate in accordance with Section 432 of the Internal Revenue Code and related IRS guidance.

Ronald C. Stokes
Ronald C. Stokes, FSA, MAAA
Enrolled Actuary No. 17-05287

3/29/2018
Date

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT I

Information on Scheduled Progress in Complying with Funding Improvement/Rehabilitation Plan as of January 1, 2018

Due to the Plan's critical status, the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan adopted a Rehabilitation Plan on November 26, 2010. This original Rehabilitation Plan did not meet the targets of a regular Rehabilitation Plan, but it was intended to avoid insolvency. The Rehabilitation Period began on January 1, 2013 and will end on December 31, 2022. Since contribution increases of \$2.50 per shift per year, which were necessary to avoid a funding deficiency by the end of the Rehabilitation Period, would have meant substantial business hardship for the contributing employers, the Trustees adopted an extended Rehabilitation Plan, in which the Plan was expected to avoid insolvency.

The original Rehabilitation Plan provided for employer contribution increases to \$4.75 per shift in 2010 and future annual increases of \$0.90 per shift and the reduction of two adjustable benefits. Effective January 1, 2011, the normal form of benefit was reduced from a five year certain and life annuity to a life annuity and the disability retirement benefit was eliminated.

The Board of Trustees recognized in 2012 that the Pension Plan may not be able to avoid insolvency but that it may only be able to delay insolvency under all of the circumstances considered, including but not limited to National Publishing Company's stated intention to withdraw from the Plan in the absence of a modified Rehabilitation Plan with no contribution cost increase. After consulting with the Fund's actuary, on December 14, 2012, the Trustees adopted new Employer Contribution Schedules which are applicable for collective bargaining agreements renewed or extended after December 14, 2012.

The revised Rehabilitation Plan, as adopted on December 14, 2012, is insufficient to prevent insolvency. Based on projections as of January 1, 2013, the first day of the Rehabilitation Period, the Plan's projected insolvency date was May of 2020. Due primarily to unfavorable asset performance for the 2015 plan year (an estimated 1.0% return compared to the 7.5% assumed rate), as of January 1, 2016, the Plan was projected to become insolvent in April of 2020. Since the only goal of the Rehabilitation Plan was to delay insolvency beyond May of 2020, which was the projected insolvency date as of the beginning of the Rehabilitation Period, the Plan was certified as failing to make scheduled progress in 2015.

Based on projections as of January 1, 2017, the plan was expected to become insolvent in April of 2020, which is earlier than May of 2020 (the projected insolvency date determined at the beginning of the Rehabilitation Period). Therefore, the plan did not make scheduled progress under the Rehabilitation Plan in 2016. This was the second consecutive year that the plan was certified as failing to make scheduled progress under the Rehabilitation Plan.

The Board of Trustees, at its meeting on October 18, 2017, updated the Rehabilitation Plan, effective for plan years beginning on or after January 1, 2017, to amend the annual standard for measuring

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT I
(Page Two)

scheduled progress such that scheduled progress is made if the plan does not become insolvent before 2020. With the plan's estimated asset return of 16.9% for the 2017 plan year (compared to the 7.5% assumed rate), based on projections as of December 31, 2017, the insolvency date has advanced to June of 2020. Therefore, the plan is being certified as making scheduled progress under the current Rehabilitation Plan for the 2017 plan year.

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT II

Determination of Actuarial Zone Status under IRC Section 432 for the Plan Year January 1, 2018 to December 31, 2018

CRITICAL STATUS

- Plan status is critical because at least one of the following conditions is met (ignoring effect of any amortization base extensions per the Pension Protection Act of 2006 but including effect of any amortization base extensions allowed under the Pension Relief Act of 2010):
- The plan is less than 65% funded and will become insolvent within seven years.
 - The plan is expected to have a funding deficiency within four years (within five years if the plan is less than 65% funded).
 - The plan's current year contributions are insufficient to pay the normal cost and interest on the unfunded accrued liability (i.e., infinite amortization period), the actuarial present value of vested benefits of inactive participants exceeds those of the active participants, and an accumulated funding deficiency is projected within five years.
 - The Fund will become insolvent within five years.
 - The Plan was previously in critical status and either a funding deficiency is projected within ten years (including effect of any amortization base extensions) or insolvency is projected within 31 years.
- Plan status is not critical but is projected to become critical in any of the five succeeding plan years. The plan sponsor has elected to treat the plan status as critical for the current plan year.

CRITICAL AND DECLINING STATUS

- Plan status is critical and declining because it is in critical status and insolvency is projected under the current rehabilitation plan in either:
 - the current plan year or any of the succeeding 14 plan years; or
 - the current plan year or any of the succeeding 19 plan years, if the funded percentage is less than 80% or the ratio of inactive plan participants to active participants exceeds 2 to 1.

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT II

Determination of Actuarial Zone Status under IRC Section 432 for the Plan Year January 1, 2018 to December 31, 2018

ENDANGERED STATUS

- Plan status is endangered because the plan is not critical and one of the following conditions is met:
 - The plan is less than 80% funded.
 - A funding deficiency is projected within seven years.
- Plan status is seriously endangered because the plan is not critical and both of the above conditions are met.

NEITHER ENDANGERED NOR CRITICAL STATUS

- Plan status is neither endangered nor critical because none of the above conditions are met.
- The plan is in endangered status; however, the plan's status was neither endangered nor critical for the prior plan year, and the plan is projected to no longer be in endangered status as of the last day of the tenth succeeding plan year.

PROJECTION OF CRITICAL STATUS *(Not applicable for plan in critical status)*

- Plan status is projected to become critical in any one of the five succeeding plan years.
- Plan status is not projected to become critical in any of the five succeeding plan years.

ACTUARIAL STATUS DETERMINATION WORKSHEET

Under PPA Section 432 of the Internal Revenue Code

For the Plan Year January 1, 2018 to December 31, 2018

BINDERY INDUSTRY EMPLOYERS GCC/IIBT PENSION FUND

EIN: 23-6209755 PN: 001

EXHIBIT III - FOR 2018 ZONE CERTIFICATION

SHIFT CONTRIBUTION RATE = \$5.66 BLENDED ON 1/1/17 (\$5.50 FOR NATIONAL, \$.65 FOR OTHER EMPLOYERS)

NATIONAL ASSUMED TO HAVE 84.7% OF TOTAL SHIFTS

ASSET PERFORMANCE IN 2018 & LATER: 7.50%

FIVE YEAR AMORTIZATION BASE EXTENSION EFFECTIVE 1/1/08

EST. MV RETURN FOR 2017 = 16.9%

PLAN STATUS: CRITICAL AND DECLINING IN 2018

(-65% FUNDED; FUNDING DEFICIENCY IN 5 YRS.; INSOLVENCY WITHIN 20 YEARS)

PROJECTED INSOLVENCY IN JUNE 2020

BASED ON JANUARY 1, 2017 VALUATION - ENTRY AGE NORMAL COST METHOD

	CURRENT PLAN VALUATION 01/01/17	PROJECTED VALUATION 2018	PROJECTED VALUATION 2019	PROJECTED VALUATION 2020	PROJECTED VALUATION 2021	PROJECTED VALUATION 2022	PROJECTED VALUATION 2023	PROJECTED VALUATION 2024	PROJECTED VALUATION 2025	PROJECTED VALUATION 2026	PROJECTED VALUATION 2027	PROJECTED VALUATION 2028
(A) NUMBER OF PARTICIPANTS												
ACTIVE	157	157	157	157	157	157	157	157	157	157	157	157
TERMINATED VESTED	215	215	215	215	215	215	215	215	215	215	215	215
RETIRED	464	464	464	464	464	464	464	464	464	464	464	464
TOTAL	836	836	836	836	836	836	836	836	836	836	836	836
(B) ACTUARIAL ACCRUED LIABILITY												
ACTIVES	3,208,711	3,156,377	3,101,515	3,043,003	2,980,103	2,914,347	2,842,495	2,765,720	2,686,445	2,604,248	2,522,402	2,436,279
TERMINATED VESTED	2,086,043	2,052,020	2,016,353	1,978,313	1,937,421	1,894,671	1,847,959	1,798,047	1,746,508	1,693,071	1,639,861	1,583,870
RETIRED AND DISABLED	9,056,001	8,908,299	8,753,460	8,588,321	8,410,797	8,225,211	8,022,424	7,805,741	7,582,000	7,350,015	7,119,019	6,875,952
TOTAL	14,350,755	14,116,697	13,871,328	13,609,637	13,328,320	13,034,229	12,712,879	12,369,508	12,014,953	11,647,334	11,281,282	10,896,101
(C) PLAN ASSETS (MARKET VALUE)	3,475,390	2,755,625	1,713,896	596,119	-605,492	-1,888,899	-3,273,764	-4,760,413	-6,343,991	-8,032,811	-9,819,153	-11,731,147
(C2) PLAN ASSETS (ACTUARIAL VALUE)	3,545,783	2,802,554	1,745,182	616,976	-591,587	-1,879,629	-3,267,594	-4,756,293	-6,341,245	-8,030,979	-9,817,933	-11,730,333
(C3) EXPECTED AVA		2,557,072	1,764,344	629,751	-583,071	-1,873,951	-3,263,799	-4,753,769	-6,339,563	-8,029,858	-9,817,185	-11,729,835
(D) UNFUNDED ACCRUED LIABILITY	10,804,972	11,314,143	12,126,146	12,992,662	13,919,908	14,913,858	15,980,463	17,125,801	18,356,198	19,678,314	21,099,215	22,626,434
(E) NORMAL COST (WITH EXPENSES)	159,646	159,646	159,646	159,646	159,646	159,646	159,646	159,646	159,646	159,646	159,646	159,646
(F) CONTRIBUTIONS												
MINIMUM REQUIRED	5,657,556	7,238,657	8,940,512	10,725,816	12,695,043	14,489,659	16,487,728	18,210,351	20,191,407	21,999,787	23,629,980	25,570,032
CONTRIBUTION RATE	5,660,000	5,660,000	5,660,000	5,660,000	5,660,000	5,660,000	5,660,000	5,660,000	5,660,000	5,660,000	5,660,000	5,660,000
EXPECTED SHIFTS	37,916	37,916	37,916	37,916	37,916	37,916	37,916	37,916	37,916	37,916	37,916	37,916
EXPECTED CONTRIBUTIONS	214,605	214,605	214,605	214,605	214,605	214,605	214,605	214,605	214,605	214,605	214,605	214,605
AMORTIZATION PERIOD IN YRS* (N/A=INFINITE)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
(G) PROJECTION VALUES												
CREDIT BALANCE	-3,938,242	-5,434,904	-7,016,005	-8,717,860	-10,548,801	-12,472,391	-14,540,893	-16,491,075	-18,361,807	-19,998,926	-21,728,785	-23,536,818
BENEFIT PAYMENTS	1,295,000	1,289,000	1,287,000	1,287,000	1,279,000	1,284,000	1,282,000	1,269,000	1,255,000	1,227,000	1,219,000	1,222,000
ADMINISTRATIVE EXPENSES	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000
PURE UNIT CREDIT NORMAL COST (NO EXPENSES)	95,202	95,202	95,202	95,202	95,202	95,202	95,202	95,202	95,202	95,202	95,202	95,202
NET FSA CHARGES/(CREDITS)	1,164,955	1,164,955	1,164,955	1,122,502	1,122,502	867,724	657,492	309,484	281,418	233,371	112,915	109,529
EXTRA FSA CHARGES/(CREDITS) FROM AVA>MVA	0	(25,870)	(23,851)	(22,504)	(21,607)	(21,008)	(20,610)	(20,344)	(20,166)	(20,048)	(19,969)	(19,917)
(H) PV OF ACCUM. BENEFITS												
VESTED	13,927,599	13,728,094	13,519,863	13,298,095	13,059,694	12,811,730	12,539,970	12,249,908	11,952,646	11,646,604	11,346,719	11,032,660
NONVESTED	13,345	13,154	12,954	12,742	12,513	12,276	12,015	11,737	11,453	11,159	10,872	10,571
TOTAL	13,940,944	13,741,248	13,532,818	13,310,837	13,072,207	12,824,006	12,551,986	12,261,646	11,964,099	11,657,764	11,357,591	11,043,231
(I) FUNDED PERCENTAGE												
VESTED	25.0%	20.1%	12.7%	4.5%	-4.6%	-14.7%	-26.1%	-38.9%	-53.1%	-69.0%	-86.5%	-106.3%
TOTAL (AVA/PVAB)	25.4%	20.4%	12.9%	4.6%	-4.5%	-14.7%	-26.0%	-38.8%	-53.0%	-68.9%	-86.4%	-106.2%
(L) MC + 15 YEAR AMORT (PER SHIFT)*	\$35.53	\$36.99	\$39.34	\$41.83	\$44.51	\$47.38	\$50.45	\$53.75	\$57.30	\$61.11	\$65.21	\$69.62
(M) UNFUNDED VESTED BENEFITS.	10,452,209	10,972,469	11,805,967	12,701,976	13,665,186	14,700,629	15,813,734	17,010,321	18,296,637	19,679,415	21,165,873	22,763,807

* CONTRIBUTIONS ASSUMED TO BE MADE ON JULY 1 OF PLAN YEAR.

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT IV

Assumptions for Actuarial Status Certification as of January 1, 2018

The data and assumptions used in determining the Plan's status as of January 1, 2018, as shown on the Actuarial Status Determination Worksheet (Exhibit III), are as follows:

- The projections of the Plan's cost and liabilities were based on projections of the January 1, 2017 actuarial valuation results, using the actuarial assumptions and plan provisions as listed in Appendix A and Appendix B of the January 1, 2017 actuarial valuation report (dated October 3, 2017), respectively;
- The projections of the Plan's assets were based on the Plan's unaudited financial data as of December 31, 2017 received from the Plan's auditor and/or investment consultant;
- The projected funded percentages were determined using the unit credit cost method; and
- The projected contributions assume the terms of the collective bargaining agreements for the current plan year will remain in effect for succeeding plan years.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**Actuarial Valuation
as of January 1, 2019**

richard Gabriel associates
Employee Benefits Consultants and Actuaries



richard Gabriel associates

Employee Benefits Consultants and Actuaries

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601 Dresher Road, Suite 201

Horsham, Pennsylvania 19044-2203

September 27, 2019

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
601 Dresher Road, Suite 201
Horsham, PA 19044

Dear Board of Trustees:

This letter presents the results of our actuarial valuation of the Bindery Industry Employers GCC/IBT Pension Plan as of January 1, 2019. The valuation was based on the plan provisions in effect on that date.

The draft financial data was provided by the plan's auditor and the basic participant data by the plan administrator. The actuarial values were calculated by us on the basis of this data, our interpretation of the plan provisions, and the actuarial assumptions as disclosed in Appendix A. Highlights of the valuation appear in the Executive Summary.

The actuarial experience of the plan since the last valuation was more favorable than anticipated by the actuarial assumptions, producing a net actuarial gain of \$176,342. A loss of approximately \$41,000 was attributable to unfavorable asset performance in 2018, on an actuarial value basis. The plan assets earned 5.0% in 2018 on an actuarial value basis and (3.5)% on a market value basis, compared to the assumed rate of return of 7.0%. A liability gain occurred due to more than expected deaths and census refinements and resulted in a net actuarial gain.

The minimum required contribution has increased from \$7,292,025 in 2018 to \$9,035,381 in 2019 due to the plan's accumulated funding deficiency. The funding deficiency has increased from \$5,448,555 as of December 31, 2017 to \$7,096,620 as of December 31, 2018. The maximum deductible contribution is \$30,414,680 for the 2019 plan year.

The expected contributions of \$183,249 for the 2019 plan year are insufficient to meet the minimum funding requirements. Since the plan is in critical and declining status, the 5% penalty tax under IRC Section 4971(a)(2) is not applicable as long as the plan is operating under a rehabilitation plan. However, per IRC Section 4971(g)(3)(B), the IRS may impose a penalty tax on the accumulated funding deficiency if a plan does not make scheduled progress under a rehabilitation plan for a 3-consecutive year period.

Due to the unfavorable asset performance in 2018 on a market value basis, the projected insolvency date advanced from June 2020 (based on the January 1, 2018 valuation results) to April 2020 (based on the information used for the actuarial zone status certification as of January 1, 2019). Per the Rehabilitation Plan, as last amended on October 18, 2017, scheduled progress is met if insolvency is projected not to occur before 2020. Since the plan was not projected to become insolvent before the first day of the

2020 plan year, the plan was certified as making scheduled progress for the 2018 plan year. Based on projections of the January 1, 2019 valuation, insolvency is projected to occur in April 2020.

Since the plan is less than 65% funded, and since a funding deficiency has already occurred and insolvency is projected within 20 years, the plan status remains critical and declining for 2019. The goal of the current Rehabilitation Plan is to delay insolvency, which is expected to occur in 2020. Per Section 432(e)(3) of the Pension Protection Act of 2006, the Board of Trustees is required to annually review and update, as necessary, the Rehabilitation Plan. The Trustees should exhaust all reasonable measures (i.e., increase contribution levels and/or reduce benefits) to forestall possible insolvency.

A common measure of the level of funding of a pension plan is the ratio of the market value of plan assets to the value of accrued benefits. This ratio is 10.8% as compared to 19.2% on the last valuation. The decrease in this ratio occurred because the benefit payments are reducing the plan assets by a larger percentage than they reduce the liabilities. The decline was also accelerated by the unfavorable investment performance.

ACTUARIAL CERTIFICATION

The information and results contained in this actuarial valuation report as of January 1, 2019 were prepared for the use of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and its auditors. The actuarial computations made are for purposes of determining the plan's funding requirements and accounting disclosures under FASB Accounting Standards Codification 960 (ASC 960). The report has been prepared for the purposes outlined herein and should not be relied upon for any other purpose. Determinations for purposes other than meeting the plan's funding and financial accounting requirements may be significantly different than the results presented in this report. To avoid misrepresentation, the report is intended to be used in its entirety.

Our calculations were based upon the participant data as of December 31, 2018, as provided by the plan's administrator, and the draft financial data as of December 31, 2018 received from the plan's auditor. While the scope of our engagement did not call for us to perform an audit or independent verification of this information, we have reviewed this information for reasonableness. The accuracy of the results is dependent upon the accuracy and completeness of the underlying information, which is the responsibility of those who supply the data.

The actuarial cost method and assumptions, other than those prescribed by law or regulations, are selected by the actuary. In our opinion, the actuarial methods used are appropriate for the purposes of the valuation, and each economic assumption (other than those prescribed by law or regulation) was selected from a range which represents our best estimate of anticipated experience under the plan. Furthermore, the demographic assumptions used, in the aggregate, are reasonable (taking into account the experience of the plan and reasonable expectations). In our opinion, the actuarial methods used are

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
September 27, 2019
Page Three

appropriate for purposes of the valuation and the actuarial assumptions used represent our best estimate of anticipated experience of this group.

Future actuarial measurements may differ significantly from current measurements presented in this report due to such factors as the following: plan experience different from that anticipated by the economic or demographic assumptions, changes in economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for these measurements (such as the end of an amortization period or additional cost or contribution requirements based on the plan's funded status) and changes in plan provisions, accounting standards or applicable law. Due to the limited scope of the actuary's assignment, the actuary did not perform an analysis of the potential range of such future measurements.

We certify this report has been prepared in accordance with generally accepted actuarial principles and practices and, to the best of our knowledge, fairly presents the actuarial position of the plan as of January 1, 2019. The actuary and the firm responsible for this report have no conflicts of interest that may impair the objectivity of our work. We further certify that we meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.

Sincerely,



Ronald C. Stokes
F.S.A., M.A.A.A.
Enrolled Actuary No. 17-05287

RCS/vmd

binsreport2019.wpd

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

EXECUTIVE SUMMARY

A summary of the principal results of the current and preceding actuarial valuations follows:

	<u>January 1, 2019</u>	<u>January 1, 2018</u>
(A) Number of participants		
• Active	135	144
• Vested terminated	203	208
• Retired and disabled	<u>446</u>	<u>457</u>
• Total	784	809
(B) Normal cost	\$ 160,771	\$ 161,438
(C) Unfunded accrued liability at the beginning of the plan year	\$12,749,890	\$12,101,774
(D) Various contribution levels		
• Blended contribution rate per shift	\$ 5.67	\$ 5.67
• Expected contribution	\$ 183,249	\$ 192,275
• Actual contribution	To be determined	\$ 188,797
• Minimum required contribution as of the end of the plan year	\$ 9,035,381	\$ 7,292,025
• Maximum deductible contribution	\$30,414,680	\$30,920,458
• Amortization period	Infinite	Infinite
(E) Plan assets at the beginning of the plan year		
• Market value	\$ 1,503,084	\$ 2,756,882
• Actuarial value	\$ 1,579,236	\$ 2,654,904
(F) Value of accumulated plan benefits at the beginning of the plan year		
• Vested	\$13,969,049	\$14,340,921
• Nonvested	<u>6,947</u>	<u>13,758</u>
• Total	\$13,975,996	\$14,354,679
(G) Unfunded vested benefits	\$12,465,965	\$11,584,039
(H) Plan assets as a percentage of accumulated benefits		
• Market value	10.8%	19.2%
• Actuarial value	11.3%	18.5%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

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**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

I. PLAN ASSETS

(per draft audit)

(A) Statement of plan assets as of December 31, 2018 at market value

Cash and equivalents	\$ 193,737
Mutual funds - Equity	861,945
Mutual funds - Fixed income	452,514
Employers' contributions receivable	15,204
Accrued income	252
Prepaid expenses	<u>1,507</u>
Total assets	\$ 1,525,159
Administrative expenses payable	<u>(22,075)</u>
Net assets available for benefits	\$ 1,503,084

(B) Statement of changes in plan assets (market value)

Receipts	
Employers' contributions	\$ 188,797
Interest and dividends	47,488
Net realized and unrealized gains/(losses)	<u>(114,520)</u>
Total receipts	\$ 121,765
Disbursements	
Benefit payments	\$ 1,237,262
Administrative expenses	129,746
Investment expenses	<u>8,555</u>
Total disbursements	\$ 1,375,563
Net receipts	\$(1,253,798)
Plan assets	
January 1, 2018	\$ 2,756,882
December 31, 2018	\$ 1,503,084

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Determination of actuarial value of assets as of January 1, 2019

(1)	Actuarial value of Fund assets at January 1, 2018	\$ 2,654,904
(2)	(1) x 1.07	\$ 2,840,747
(3)	Contributions to the Fund during year	\$ 188,797
(4)	Interest on (3) from date of payment to December 31, 2018 at 7.0% per annum*	\$ 6,608
(5)	Disbursements (excluding investment expenses)	\$ 1,367,008
(6)	Interest on (5) to December 31, 2018 at 7.0% per annum**	\$ 51,832
(7)	Expected actuarial value at December 31, 2018 = (2) + (3) + (4) - (5) - (6)	\$ 1,617,312
(8)	Market value of Fund assets at December 31, 2018	\$ 1,503,084
(9)	Difference between market value and expected actuarial value = (8) - (7)	\$ (114,228)
(10)	Preliminary actuarial value of assets = (7) + 1/3 of (9)	\$ 1,579,236
(11)	(8) x 1.20	\$ 1,803,701
(12)	(8) x 0.80	\$ 1,202,467
(13)	Actuarial value of Fund assets at January 1, 2019 = (10), but not more than (11) or less than (12)	\$ 1,579,236

(D) Valuation assets

For purposes of this valuation, the actuarial value of plan assets in (C)(13) of \$1,579,236 is used.

(E) Asset returns

Rate of return on market value of plan assets (net of investment expenses)	(3.5)%
Rate of return on actuarial value of plan assets (net of investment expenses)	5.0 %

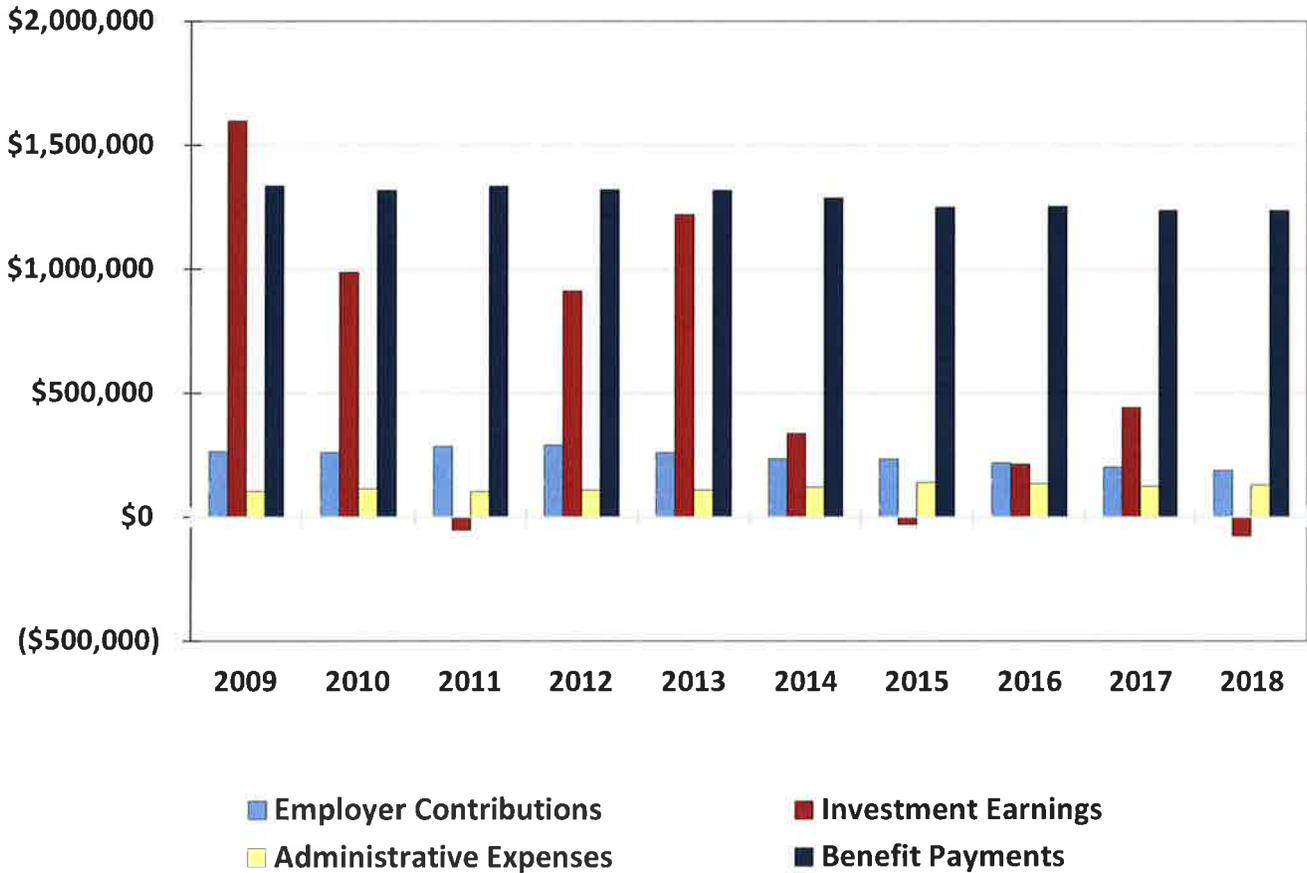
*Assumes that contributions occur on July 1, on average.

**Assumes disbursements are paid on the first day of the month.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART I

**HISTORY OF RECEIPTS AND DISBURSEMENTS
FOR PLAN YEARS ENDING DECEMBER 31**



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

II. UNFUNDED ACCRUED LIABILITY

(A)	Unfunded accrued liability as of January 1, 2018	\$ 12,101,774
(B)	Normal cost for the plan year (with expenses)	\$ 161,438
(C)	Interest on (A) and (B) for one year	\$ 858,425
(D)	Contributions on account of the plan year	\$ 188,797
(E)	Interest on (D) from the dates paid to the end of the plan year*	\$ 6,608
(F)	Expected unfunded accrued liability as of January 1, 2019 = (A) + (B) + (C) - (D) - (E)	\$ 12,926,232
(G)	Actual unfunded accrued liability as of January 1, 2019	\$ 12,749,890
(H)	Actuarial gain (loss) = (F) - (G)	\$ 176,342

*Contributions are assumed paid on July 1, 2018, on average.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**III. FUNDING STANDARD ACCOUNT
(Plan year ending December 31, 2018)**

(A)	Charges to Funding Standard Account	
(1)	Prior year funding deficiency	\$ 5,448,555
(2)	Normal cost for the plan year (with expenses)	161,438
(3)	Amortization charges (on \$7,596,244)	1,332,824
(4)	Interest on (1), (2) and (3)	<u>485,997</u>
(5)	Total charges	\$ 7,428,814
(B)	Credits to Funding Standard Account	
(1)	Prior year credit balance	\$ 0
(2)	Contributions for the plan year	188,797
(3)	Amortization credits (on \$943,025)	127,840
(4)	Interest on (1), (2) and (3)	<u>15,557</u>
(5)	Total credits	\$ 332,194
(C)	Credit balance (funding deficiency) as of December 31, 2018 = (B)(5) - (A)(5)	\$(7,096,620)

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IV. SUMMARY OF VALUATION RESULTS

All values shown are as of January 1, 2019

(A)	Normal cost (with expenses)	\$ 160,771
(B)	Accrued liability	
(1)	Present value of all benefits payable in future years:	
(a)	Active participants (135)	\$ 3,326,735
(b)	Vested terminated participants (203)	2,195,515
(c)	Retired participants (446)	<u>8,999,582</u>
(d)	Total (784)	\$ 14,521,832
(2)	Present value of future normal costs	\$ 192,706
(3)	Accrued liability = (1)(d) - (2)	\$ 14,329,126
(C)	Valuation assets	\$ 1,579,236
(D)	Unfunded accrued liability = (B)(3) - (C), but not less than zero	\$ 12,749,890

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

V. DEVELOPMENT OF CONTRIBUTION LEVELS

(A)	The minimum required contribution to avoid a funding deficiency in the funding standard account for the 2019 plan year is determined as follows:	
(1)	Charges to Funding Standard Account	
(a)	Prior year funding deficiency	\$ 7,096,620
(b)	Normal cost for the plan year	160,771
(c)	Amortization charges (on \$6,701,859)	1,332,825
(d)	Interest on (a), (b) and (c)	<u>601,315</u>
(e)	Total charges	\$ 9,191,531
(2)	Credits to Funding Standard Account	
(a)	Prior year credit balance	\$ 0
(b)	Amortization credits (on \$1,048,589)	145,935
(c)	Interest on (a) and (b)	<u>10,215</u>
(d)	Total credits	\$ 156,150
(3)	Minimum required contribution to be made at the end of the plan year equals excess, if any, of (1)(e) over (2)(d)	\$ 9,035,381

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(B)	The maximum deductible contribution for the plan year ending December 31, 2019 is determined as follows:	
(1)	Normal cost for the plan year	\$ 160,771
(2)	10 year amortization of unfunded actuarial accrued liability	1,696,540
(3)	Interest on (1) and (2)	<u>130,012</u>
(4)	Total	\$ 1,987,323
(5)	Minimum required contribution = (A)(3)	\$ 9,035,381
(6)	Full funding limitation = (C)(3)	\$ 19,471,343
(7)	Tax deductible limit equals (4), but not less than (5), nor more than (6); or (C)(2)(e), if greater	\$ 30,414,680
(C)	Development of full funding limitation for maximum deductible purposes	
(1)	Based on accrued liability	
(a)	Accrued liability (including normal cost)	\$ 14,489,897
(b)	Applicable assets (lesser of actuarial or market value)	\$ 1,503,084
(c)	Full funding limitation at end of year = [(a) - (b)] x 1.07, but not less than zero	\$ 13,895,890
(2)	Based on 90% of RPA 94 current liability*	
(a)	Current liability projected to end of year	\$ 21,886,674
(b)	90% of (a)	\$ 19,698,007
(c)	Applicable assets projected to end of year	\$ 226,664
(d)	Full funding limitation = (b) - (c), but not less than zero	\$ 19,471,343
(e)	Unfunded current liability = [1.4 x (a)] - (c), but not less than zero	\$ 30,414,680
(3)	Full funding limit = greater of (1)(c) or (2)(d)	\$ 19,471,343

* Based on 3.06% interest, the RP-2014 Mortality Table with projected improvements for all healthy participants, and other assumptions as described in Appendix A.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(D) Schedule of amortization bases

<u>Why Established</u>	<u>Date Established</u>	<u>Initial Amount</u>	<u>Outstanding Balance</u>	<u>Years Remaining</u>	<u>Charge (Credit)</u>
Initial base	1/1/1977	\$ N/A	\$ 667,265	3.0	\$ 237,628
Plan amendment	1/1/1985	N/A	22,188	1.0	22,188
Plan amendment	3/1/1985	N/A	24,036	1.2	20,165
Plan amendment	1/1/1988	N/A	555,102	4.0	153,161
Plan amendment	1/1/1989	N/A	120,554	5.0	27,479
Plan amendment	1/1/1991	N/A	141,143	7.0	24,476
Plan amendment	1/1/1992	N/A	397,331	8.0	62,187
Assumption change	1/1/1994	N/A	62,809	5.0	14,316
Plan amendment	1/1/1998	N/A	68,380	14.0	7,307
Plan amendment	1/1/2001	N/A	664,109	17.0	63,572
Actuarial loss	1/1/2002	N/A	70,440	3.0	25,086
Plan amendment	1/1/2002	N/A	280,188	18.0	26,032
Actuarial loss	1/1/2003	N/A	237,554	4.0	65,544
Actuarial loss	1/1/2004	N/A	53,669	5.0	12,233
Actuarial loss	1/1/2005	233,248	101,491	6.0	19,899
Actuarial loss	1/1/2006	336,011	168,473	7.0	29,215
Actuarial gain	1/1/2007	(91,813)	(26,985)	3.0	(9,610)
Actuarial gain	1/1/2008	(98,446)	(37,271)	4.0	(10,284)
Actuarial loss	1/1/2009	2,784,110	1,273,501	5.0	290,276
Actuarial loss	1/1/2010	75,068	39,838	6.0	7,811
Actuarial loss	1/1/2011	141,739	84,885	7.0	14,720
Plan amendment	1/1/2011	(202,795)	(121,455)	7.0	(21,062)
Actuarial loss	1/1/2012	232,919	154,264	8.0	24,144
Assumption change	1/1/2012	310,195	205,450	8.0	32,155
Actuarial loss	1/1/2013	102,851	74,190	9.0	10,642
Assumption change	1/1/2013	(70,724)	(51,015)	9.0	(7,318)
Actuarial gain	1/1/2014	(397,300)	(308,399)	10.0	(41,036)
Actuarial gain	1/1/2015	(151,251)	(125,133)	11.0	(15,596)
Assumption change	1/1/2015	694,920	574,923	11.0	71,654
Actuarial gain	1/1/2016	(142,718)	(124,857)	12.0	(14,691)
Actuarial loss	1/1/2017	87,021	79,978	13.0	8,943
Actuarial gain	1/1/2018	(80,329)	(77,132)	14.0	(8,243)
Assumption change	1/1/2018	604,140	580,098	14.0	61,992
Actuarial gain	1/1/2019	(176,342)	<u>(176,342)</u>	15.0	<u>(18,095)</u>
Total			\$ 5,653,270		\$ 1,186,890

Notes:

- (1) Outstanding balances are shown as of January 1, 2019, before any payments on account of the plan year.
- (2) Net outstanding balance of \$5,653,270 less credit balance/(funding deficiency) of \$(7,096,620) equals the unfunded accrued liability of \$12,749,890.
- (3) The years remaining for certain charge bases established on or before January 1, 2008 (including the initial base, actuarial losses and plan amendments) reflect the 5-year automatic extension effective January 1, 2008 approved by the IRS on March 18, 2009.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VI. ACTUARIAL PRESENT VALUE OF ACCUMULATED PLAN BENEFITS

(A) Actuarial Present Value of Accumulated Plan Benefits as of January 1, 2019

(1)	Vested benefits	
	(a) Retired participants and beneficiaries receiving payments (446)	\$ 8,999,582
	(b) Terminated vested participants (203)	2,195,515
	(c) Active participants (126)	<u>2,773,952</u>
	(d) Total (775)	\$ 13,969,049
(2)	Nonvested benefits (9)	<u>6,947</u>
(3)	Total accumulated plan benefits (784)	\$ 13,975,996
(4)	Plan assets (market value)	\$ 1,503,084
(5)	Unfunded vested benefits = (1)(d) - (4)	\$ 12,465,965
(6)	Plan assets as a percentage of the value of vested benefits = (4) ÷ (1)(d)	10.8%

(B) Change in Actuarial Present Value of Accumulated Plan Benefits

(1)	Actuarial present value of accumulated plan benefits as of January 1, 2018	\$ 14,354,679
(2)	Increase (decrease) during the year attributable to:	
	(a) Plan amendment	\$ 0
	(b) Change in actuarial assumptions	0
	(c) Benefits accumulated and actuarial (gains)/losses	(102,944)
	(d) Increase for interest due to the decrease in the discount period	961,523
	(e) Benefits paid	<u>(1,237,262)</u>
	(f) Net increase (decrease)	\$ (378,683)
(3)	Actuarial present value of accumulated plan benefits as of January 1, 2019	\$ 13,975,996

Note: The present values shown above were calculated in accordance with Interpretations 1 and 2 of the American Academy of Actuaries. The assumed investment rate of return is 7.00%.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART II

COMPARISON OF LIABILITIES TO ASSETS FOR PLAN YEARS BEGINNING JANUARY 1

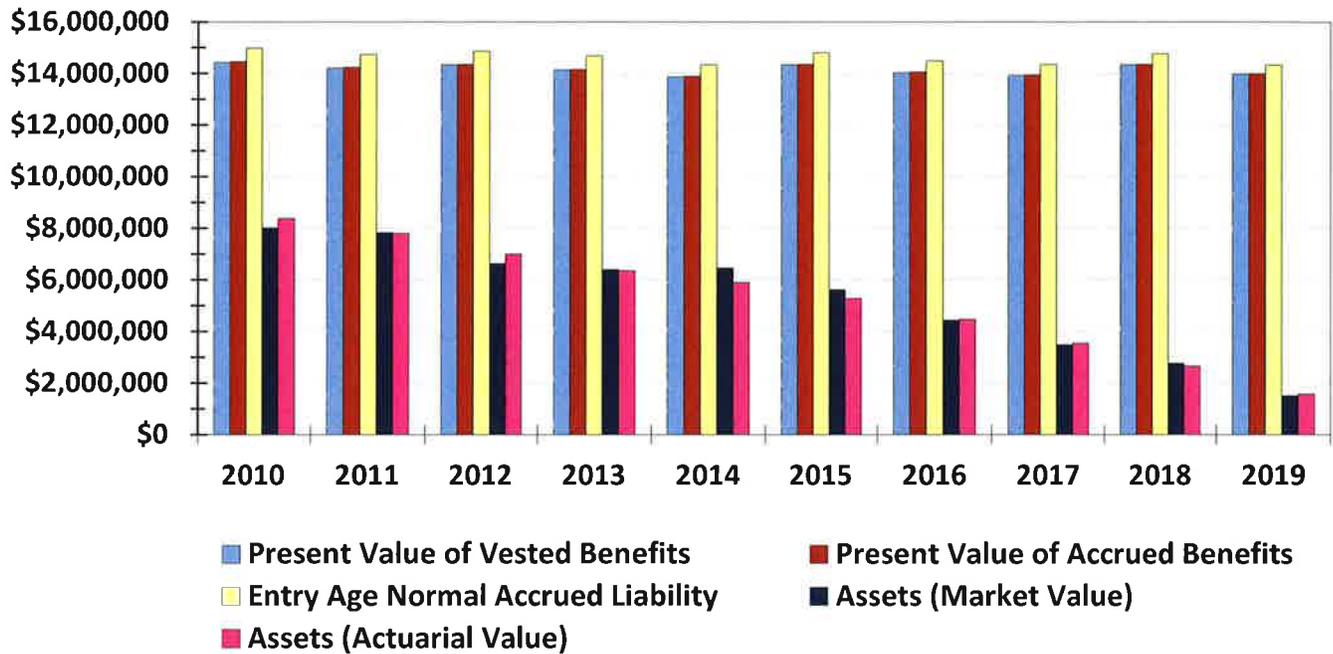
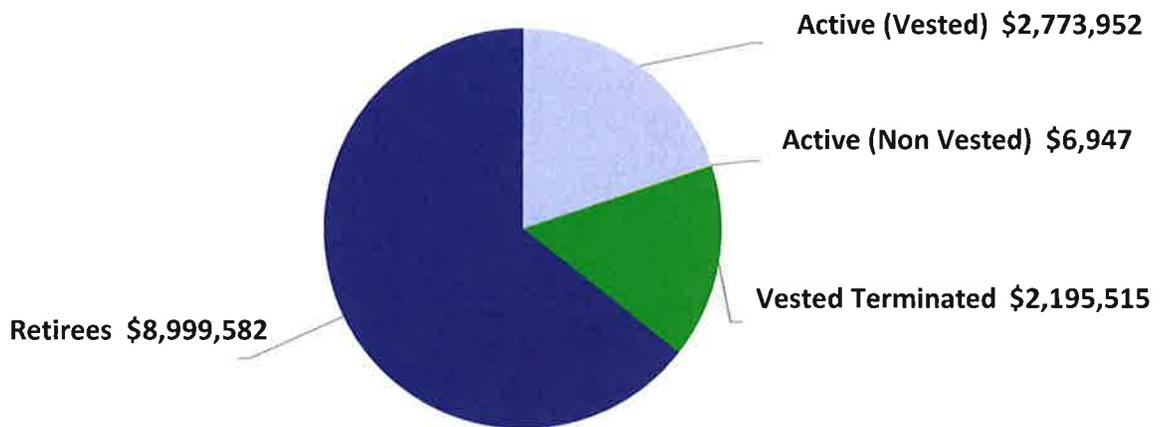


CHART III

BREAKDOWN OF PRESENT VALUE OF ACCUMULATED BENEFITS BY CATEGORY



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Unfunded Vested Benefits (Presumptive Method)

<u>Date</u>	<u>Vested Benefits Interest Rate</u>	<u>Value of Vested Benefits</u>	<u>Asset Value⁽¹⁾</u>	<u>Unfunded Vested Benefits⁽²⁾</u>
12/31/2000	8.0%	\$ 13,161,490	\$ 13,765,888	\$ (604,398)
12/31/2001	8.0%	13,729,764	12,855,490	874,274
12/31/2002	8.0%	13,966,603	11,234,306	2,732,297
12/31/2003	7.5%	14,352,701	12,245,649	2,107,052
12/31/2004	7.5%	14,617,090	12,500,580	2,116,510
12/31/2005	7.5%	14,525,963	12,170,594	2,355,369
12/31/2006	7.5%	14,482,705	12,569,788	1,912,917
12/31/2007	7.5%	14,391,719	12,337,060	2,054,659
12/31/2008	7.5%	14,644,094	7,591,676	7,052,418
12/31/2009	7.5%	14,419,795	8,014,810	6,404,985
12/31/2010	7.5%	14,402,684 ⁽³⁾	7,831,775	6,570,909
12/31/2011	7.5%	14,511,116 ⁽³⁾	6,626,197	7,884,919
12/31/2012	7.5%	14,306,141 ⁽³⁾	6,398,374	7,907,767
12/31/2013	7.5%	14,033,278 ⁽³⁾	6,451,692	7,581,586
12/31/2014 ⁽⁴⁾	7.5%	13,811,434 ⁽³⁾	5,618,297	8,193,137
12/31/2015	7.5%	14,171,573 ⁽³⁾	4,430,843	9,740,730
12/31/2016	7.5%	14,059,344 ⁽³⁾	3,475,390	10,583,954
12/31/2017	7.5%	13,881,391 ⁽³⁾	2,756,882	11,124,509
12/31/2018	7.0%	14,078,232 ⁽³⁾	1,503,084	12,575,148

Employer Withdrawal Liability is expected for any employer who withdraws from the plan prior to January 1, 2020.

Notes:

- (1) Asset values are market values.
- (2) The amount of Unfunded Vested Benefits is obtained by subtracting the market value of the plan assets from the value of vested benefits determined using ongoing plan assumptions as outlined in Appendix A.
- (3) Includes the additional value of vested adjustable benefits as of January 1, 2011 of \$182,312. For withdrawal liability purposes, this amount is being amortized over 15 years.
- (4) Effective December 31, 2014, excludes effect of any assumption changes effective on the first day of the next plan year.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VII. PROJECTED PENSION PAYMENTS

<u>Year</u>	<u>Number of Recipients</u>	<u>Amount</u>
2019	448	\$ 1,284,000
2020	439	1,288,000
2021	427	1,278,000
2022	414	1,277,000
2023	399	1,276,000
2024	384	1,261,000
2025	368	1,249,000
2026	352	1,217,000
2027	335	1,205,000
2028	318	1,198,000

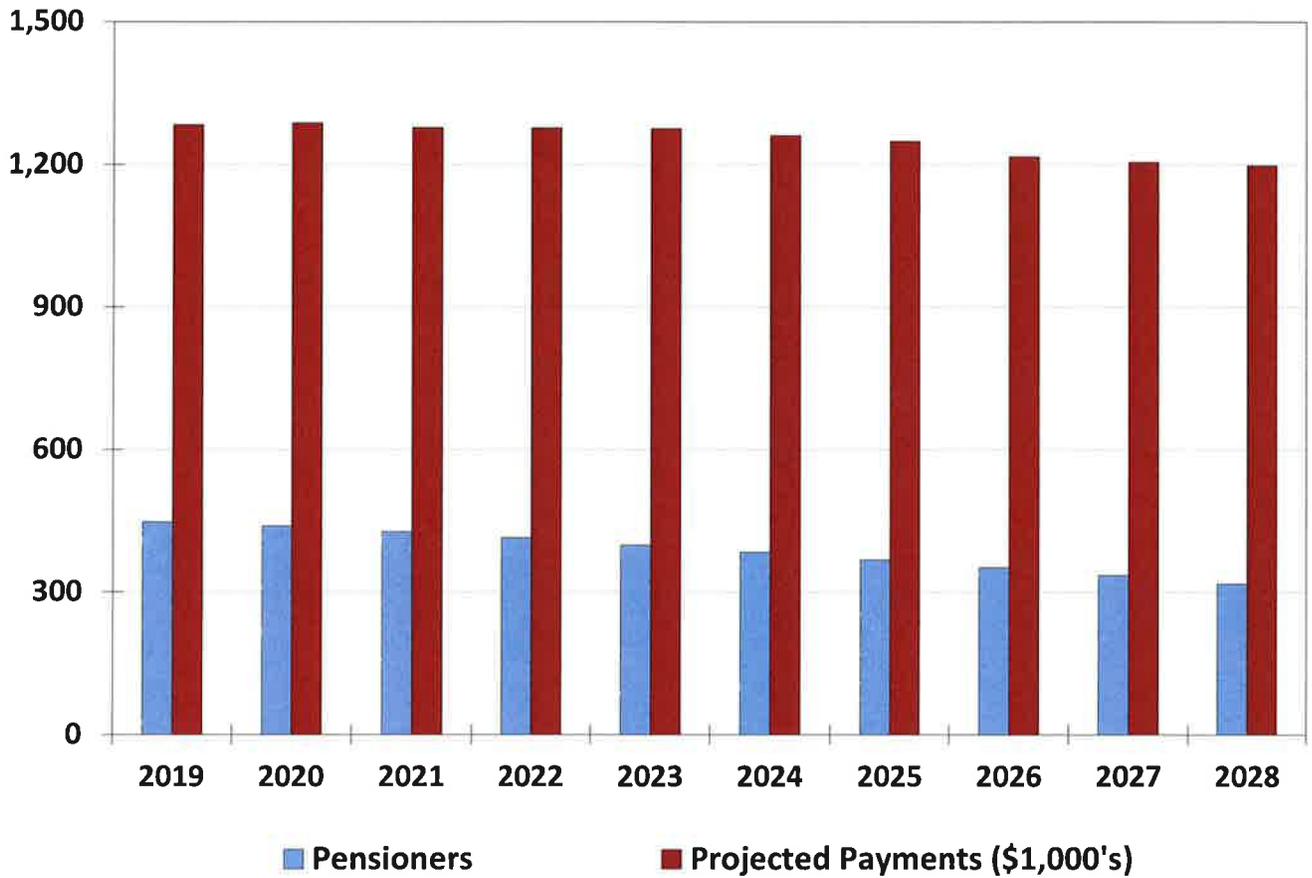
Notes:

- (1) Survivorship is based on the valuation assumptions.
- (2) For actives and those who have terminated with a vested deferred pension, this projection reflects only normal retirement pension benefits commencing at the normal retirement age. All current pension recipients are included.
- (3) No payments resulting from future terminations, disablements or deaths are reflected.
- (4) It is assumed that no future new entrants will be eligible for pension benefits during the next ten years.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART IV

PROJECTED PENSIONERS AND ANNUAL PENSION PAYMENTS



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VIII. PARTICIPANT DATA

**TABLE 1. DISTRIBUTION OF ACTIVE PARTICIPANTS
BY AGE AND SERVICE GROUPS**

Age Last Birthday	Completed Years of Credited Service									Total
	1-4	5-9	10-14	15-19	20-24	25-29	30-34	35-39	40+	
Under 25										0
25 - 29										0
30 - 34	2	2	2							6
35 - 39	2	5	1	1						9
40 - 44		2	4	1	5					12
45 - 49	1	1	2	3	3	2				12
50 - 54	2	3	5	1	2	5	1	1		20
55 - 59	1	4	4	9	1	6	1	4		30
60 - 64	2	1	1	2	3	4	2	1	8	24
65 - 69		2	1	4		2	1	3	7	20
70 & over					1	1				2
Total	10	20	20	21	15	20	5	9	15	135

Note: No active participant has less than one year of benefit service.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**TABLE 2. DISTRIBUTION OF INACTIVE PARTICIPANTS
BY AGE GROUP**

Terminated Vested Participants and Beneficiaries with Rights to Future Benefits

<u>Age Last Birthday</u>	<u>Number of Participants</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 30	2	\$ 148.40	\$ 74.20
30 - 34	1	68.60	68.60
35 - 39	11	1,439.20	130.84
40 - 44	10	1,292.20	129.22
45 - 49	22	3,361.63	152.80
50 - 54	47	7,821.67	166.42
55 - 59	48	9,479.33	197.49
60 - 64	38	8,062.86	212.18
65 & over	<u>24</u>	<u>2,955.75</u>	<u>123.16</u>
Total	203	\$34,629.64	\$170.59

Normal, Early & Disability Retirements and Beneficiaries

<u>Age Last Birthday</u>	<u>Number of Participants</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 55	3	\$ 387.23	\$129.08
55 - 59	14	1,766.55	126.18
60 - 64	40	7,098.42	177.46
65 - 69	65	17,099.65	263.07
70 - 74	67	18,305.07	273.21
75 - 79	106	26,220.19	247.36
80 - 84	66	16,332.71	247.47
85 - 89	48	8,390.62	174.80
90 & over	<u>39</u>	<u>5,273.75</u>	<u>135.22</u>
Total	448	\$100,874.19	\$225.17

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IX. SUMMARY OF PARTICIPANT DATA

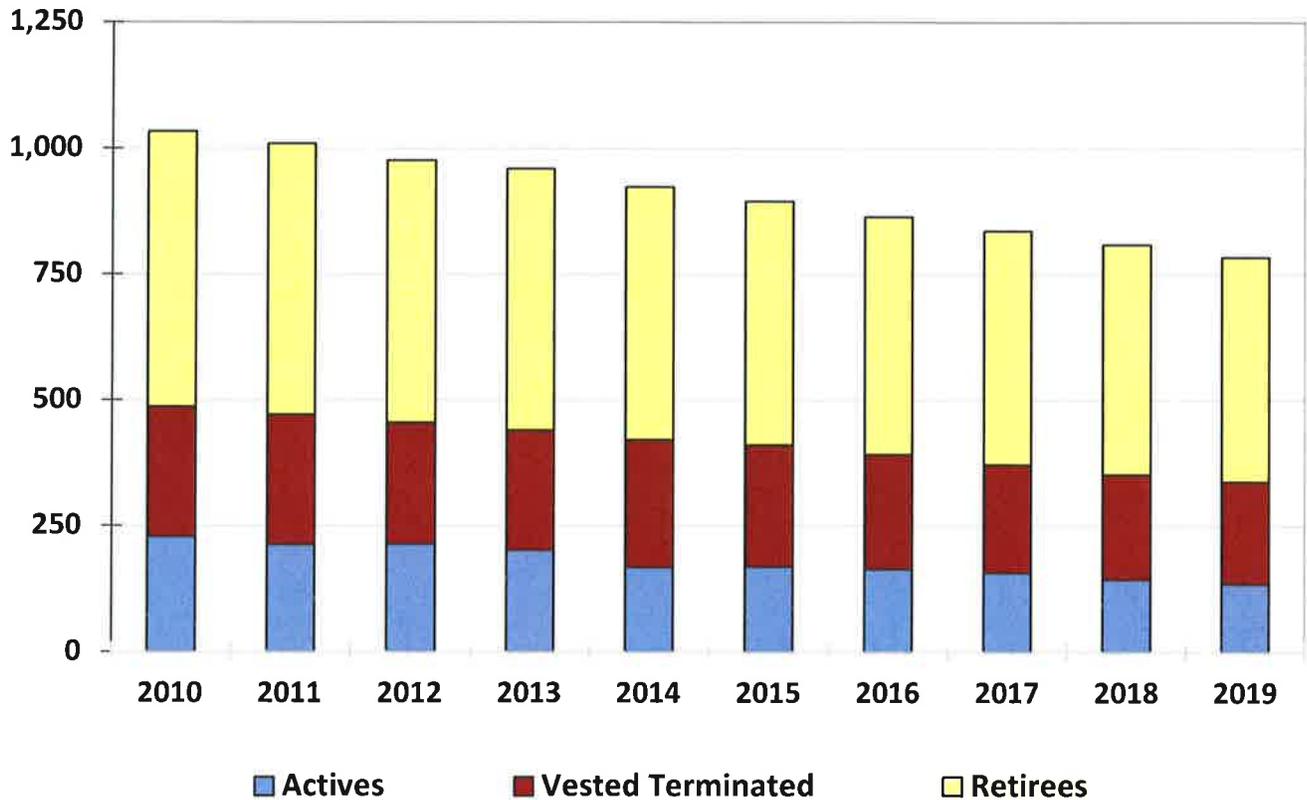
	<u>January 1, 2019</u>	<u>January 1, 2018</u>
(A) Active Participants		
(1) Number	135	144
(2) Average benefit service to date	21.0	21.5
(3) Average attained age	54.5	54.2
(4) Accrued annual pension		
(a) Total	\$ 449,276	\$ 490,806
(b) Average	\$ 3,328	\$ 3,408
(5) Projected annual pension		
(a) Total	\$ 665,074	\$ 729,920
(b) Average	\$ 4,926	\$ 5,069
(B) Vested terminated participants		
(1) Number	203	208
(2) Accrued annual pension		
(a) Total	\$ 407,524	\$ 413,985
(b) Average	\$ 2,008	\$ 1,990
(C) Disabled pensioners		
(1) Number	32	33
(2) Annual pension		
(a) Total	\$ 97,309	\$ 101,730
(b) Average	\$ 3,041	\$ 3,083
(D) Other pensioners and beneficiaries		
(1) Number	416*	426*
(2) Annual pension		
(a) Total	\$1,113,181	\$1,133,269
(b) Average	\$ 2,676	\$ 2,660

* Two participants are both a pensioner and a beneficiary. Two pensioners are alternate payees under a qualified domestic relations order (QDRO).

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART V

PARTICIPANT CENSUS COMPARISON



	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>
Actives	229	213	214	202	168	169	164	157	144	135
Vested Terminated	258	258	241	238	253	242	228	215	208	203
Retirees	546	538	521	519	502	484	472	464	457	446

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

X. RECONCILIATION OF CENSUS DATA

	<u>Actives</u>	<u>Terminated Vesteds</u>	<u>Retirees, Disabled Retirees and Beneficiaries*</u>	<u>Total</u>
Participants as of 1/1/2018	144	208	459	811
New participants	5	0	0	5
Reemployed participants	1	(1)	0	0
Nonvested terminations	(1)	0	0	(1)
Vested terminations	(5)	5	0	0
Retirements	(6)	(7)	13	0
Deaths with beneficiary	0	(1)	(2)	(3)
Deaths without beneficiary	0	(1)	(25)	(26)
Deaths with lump sum paid	(3)	0	0	(3)
New beneficiaries	0	0	3	3
Other (new QDRO Alternate Payee)	0	0	0	0
Benefits expired	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Participants as of 1/1/2019	135	203	448	786

*Retirees include two alternate payees under a qualified domestic relations order (QDRO) as of January 1, 2018 and January 1, 2019.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

ACTUARIAL METHODS AND ASSUMPTIONS

(A) Actuarial cost method

Entry age normal.

(B) Asset valuation method

Plan assets are valued using an actuarial smoothing method. Beginning with the January 1, 1995 plan year, the actuarial value of assets as of each valuation date is equal to the prior plan year's actuarial value adjusted to reflect contributions and disbursements, and then increased to reflect interest at the assumed investment rate. This value is then adjusted, up or down, by one-third of the difference between such value and the actual market value. In no event will the actuarial value of assets be less than 80% or more than 120% of the actual market value.

(C) Persons included

Based on data provided to us, all persons entitled to coverage under the plan as of the valuation date are included in the calculations.

(D) Significant actuarial assumptions

(1) Investment return

7.0% compounded annually, net of investment expenses.

(2) Retirement rates

<u>Age</u>	<u>Rate</u>
55 - 61	2%
62	15%
63	10%
64	10%
65	40%
66 - 69	33%
70	100%

Terminated vested participants are assumed to retire at age 65 or the valuation date, if later. Spouses of deceased terminated vested participants are assumed to retire when the participant would have attained age 65.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(3) Mortality

The following headcount-weighted RPH-2014 Mortality Tables (Male/Female) are used:

- (a) Pre-retirement - RPH-2014 Blue Collar Employee Mortality Table with a one-year setback to reflect expected mortality improvement.
- (b) Post-retirement

Not disabled: RPH-2014 Blue Collar Healthy Annuitant Mortality Table with a one-year setforward (formerly, prior to January 1, 2012, a two-year setforward) to reflect expected mortality improvement.

Disabled lives: 150% of the RPH-2014 Disabled Retiree Mortality Table.

(4) Withdrawal from service

- (a) Select rates are used in the first 5 years of service.

<u>Years of Service</u>	<u>Rate</u>
0	30%
1	20%
2	15%
3	15%
4	13%

- (b) After 5 years of service, turnover rates vary by attained age.

<u>Age</u>	<u>Rate</u>
25	8%
30	7%
35	7%
40	6%
45	6%
50	6%
55	3%
60	3%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(5) Disability

100% of the rates developed in a 1955 study of experience among several large industrial employee groups.

(6) Hours of work

It was assumed that each participant will work the same number of shifts in each future year that he worked in the most recent plan year.

(7) Allowance for other expenses

Administrative expenses payable from the trust are assumed to be covered by a \$125,000 addition to the normal cost.

(8) Expected employer contributions

Employees are assumed to work the same number of shifts in future years that they worked in the most recent plan year. At an annual rate of 32,319 shifts (the 2018 total for actives) and the blended contribution rate of \$5.67 per shift (\$5.50 for National and \$6.55 for all other employers), expected contributions are \$183,249 for 2019.

(9) Marriage

It was assumed that 80% of active and terminated vested participants are married with females assumed to be three years younger than males.

(10) Terminated vested participants

Terminated vested participants over age 70 are assigned a 50% probability of collecting their benefits.

(E) Data qualifications

If the date of birth was missing, the participant was assumed to be hired at age 30.

(F) Change in actuarial methods and assumptions

The actuarial methods and assumptions are the same as those used in the prior valuation.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(G) Basis for selection of demographic assumptions

Demographic assumptions are based on national tables, as periodically updated, which are determined by the actuary to be appropriate for this plan. In the case of assumptions for which the experience of the plan is credible, plan experience is used. For example, administrative expenses are determined from recent experience, per the plan audit. The retirement assumption is determined from plan experience. These assumptions are periodically adjusted in light of developing experience.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

PLAN SUMMARY

(A) Effective date and plan year

The effective date of the plan is January 1, 1962. As part of the Rehabilitation Plan, adjustable benefits were reduced effective January 1, 2011, including the change to the normal form of benefits from a five year certain and life annuity to a life annuity and the elimination of the disability benefit.

The plan year is the calendar year.

(B) Eligibility for coverage

An employee who is a member of an Eligible Employee Classification becomes a participant in the plan on the first day of the month coincident with or next following the completion of one year of service. Journeymen Bookbinders become participants on the date of covered employment.

(C) Employee contributions

None.

(D) Normal retirement date

The normal retirement date is the first day of the month coincident with or next following the later of the attainment of age 65 or the 5th anniversary of plan participation. A participant cannot retire prior to participating in the plan for at least 5 years.

(E) Employment after normal retirement date

If employment continues beyond the normal retirement date, pension payments will not commence until actual retirement. However, pension payments will commence no later than April 1 of the calendar year following the year in which the participant attains age 70-1/2, if employment continues beyond such date. Additional pension credits continue to accrue until the actual retirement date.

(F) Break in service

A temporary break in service occurs if less than 60 shifts are worked in two consecutive plan years and less than 52 shifts in at least one of them. No break shall occur, however, during periods of authorized leaves of absence, military service, sickness, accident or job-protected leave under the Family Medical Leave Act of 1993. A temporary break in service becomes a

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

permanent break in service when the period of temporary break equals or exceeds the greater of five years or credited service accumulated prior to the temporary break. A permanent break results in forfeiture of all credited service unless the participant has at least 5 years of vesting service.

(G) Credited service

Benefit accrual - one full year is credited for each plan year in which the participant is credited with at least 220 shifts. Fractional years are credited in years in which a participant works fewer than 220 shifts. Credited service is reduced by 1/10 for each 22 shifts less than 220 that the participant works in each plan year. No service credit is counted until a participant has completed two years of continuous service. Once two years of continuous service have been earned, service is retroactively credited.

Vesting - one year of Vesting Service is credited for each plan year in which at least 103 shifts (equivalent of 750 hours) are credited. No partial years are credited for vesting purposes.

(H) Normal retirement pension

- (1) Eligibility requirements - must be a participant at Normal Retirement Date and retire on or after that date.
- (2) Monthly pension - \$14.00 per month per year of Credited Service with no maximum on service.

(I) Early retirement pension

- (1) Eligibility requirements - must have reached age 55 with at least 5 years of Vesting Service.
- (2) Monthly pension - The normal retirement pension accrued to the early retirement date reduced by ½% for each month that the early retirement date precedes the Normal Retirement Date.

(J) Disability retirement pension

- (1) Effective for disability eligibility prior to January 1, 2011
 - (a) Eligibility requirements - must have at least 5 years of Credited Service. The disability must be total and permanent as defined in the plan and the participant must be entitled to a Social Security disability pension award.

**BINDERY INDUSTRY EMPLOYERS
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(b) Monthly pension - the normal retirement pension accrued to the date of disability, unreduced for early commencement and payable as of the effective date of the Social Security disability award.

(2) Effective January 1, 2011, the disability retirement pension is eliminated for participants who meet the eligibility requirements in (J)(1)(a) on and after January 1, 2011.

(K) Benefits payable on other termination of employment

(1) Eligibility requirements - must have completed 5 or more years of Vesting Service.

(2) Monthly pension - the normal retirement pension accrued to the date of termination reduced for early commencement as in (I)(2), if applicable.

(L) Pre-retirement death benefit

(1) Eligibility requirements - an active or terminated vested participant who has completed 5 years of Vesting Service.

(2) Nonmarried participant - lump sum payment equal to \$108 per year that contributions were made between January 1, 1962 and December 31, 1973, plus \$126 per year that contributions were made between January 1, 1974 and December 31, 1975 plus \$157.50 per year that contributions were made on and after January 1, 1976. The maximum single sum payable is \$5,512.50, subject to any restrictions under Code Section 432(f)(2).

(3) Married participant - If eligible for early retirement at death, the eligible spouse will receive a monthly benefit equal to 50% of the normal retirement pension computed as of the date of death, reduced for early commencement as if the participant had retired the day before his death. If younger than early retirement age at death, the benefit will be determined as of the date of death but reduced as if he had retired at the earliest retirement age and further reduced as if the participant had elected the continuation to the spouse under the 50% joint and survivor annuity. If the value of this benefit is less than the lump sum death benefit in (2) above, the excess will be paid to the surviving spouse in a lump sum.

Monthly payments commence on the first day of the month following the later of the participant's death or the month the participant would have attained early retirement age and will be payable during the surviving spouse's lifetime.

**BINDERY INDUSTRY EMPLOYERS
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(M) Normal and optional forms of payment

(1) Normal form

- (a) Married participant - automatic surviving spouse annuity providing a reduced pension payable to the retired participant during his lifetime with 50% continuing monthly for the life of his surviving spouse after his death. This is automatic unless the participant elects otherwise with the consent of his spouse.
- (b) Single participant (for benefits commencing on or after January 1, 2011) - life annuity.

(2) Optional forms

- (a) 75% Joint and Survivor Annuity - a reduced amount of pension is payable to the retired participant during his lifetime with the provision that after his death 75% of such reduced benefit shall continue to and for the lifetime of his eligible surviving spouse.
 - (b) Five Year Certain and Life Annuity (for benefits commencing on or after January 1, 2011) A reduced pension is payable to the retired participant during his lifetime, with the provision that if his death occurs before he has received 60 monthly payments, such payments will continue to his designated beneficiary until a total of 60 monthly payments have been made.
- (3) Lump sum - payable if the actuarially equivalent present value of the vested accrued benefit is \$2,500 or less.

(N) Suspension of benefits

The retirement benefit otherwise payable to a pensioner shall be permanently suspended for each calendar month in which the pensioner completes 40 or more hours of service in the bookbinding industry, in an occupation in which the pensioner was employed at any time under the plan, and in the geographic area covered by the plan (as defined in Department of Labor Regulations Section 2530.203-3) at the time payment of benefits to the pensioner commenced.

(O) Increases for retired participants

- (1) Effective October 1, 1987 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on October 1, 1987 received a 10% increase in his monthly benefit.

**BINDERY INDUSTRY EMPLOYERS
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- (2) Effective January 1, 1992 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 1992 received a 10% increase in his monthly benefit.
- (3) Effective January 1, 2002 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 2002 received a 5% increase in his monthly benefit.



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Horsham, Pennsylvania 19044-2203

**ANNUAL MULTIEMPLOYER PLAN
ACTUARIAL STATUS CERTIFICATION
UNDER SECTION 432 OF THE INTERNAL REVENUE CODE**

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

Name, Address and Telephone Number of Plan Sponsor:

Board of Trustees
Bindery Industry Employers GCC/IBT Pension Plan
601 Dresher Road, Suite 201
Horsham, PA 19044
Telephone: (215) 773-0900

Plan Year of Certification: January 1, 2019 - December 31, 2019

Plan Status: Critical and declining

Actuarial Certification: This Actuarial Status Certification as of January 1, 2019 was prepared for the use of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and for IRS reporting purposes. The attached **Exhibit I** describes the scheduled progress in meeting the requirements of a funding improvement or rehabilitation plan, if applicable. The attached **Exhibits II and III** provide information supporting and qualifying the actuarial status determination.

The actuarial computations and projections made are for purposes of determining the Plan's actuarial status in accordance with Section 432 of the Internal Revenue Code and related IRS guidance and should not be relied upon for any other purpose. The attached **Exhibit IV** summarizes the data used and assumptions made for these actuarial computations and projections. Determinations for purposes other than determining the Plan's zone status may be significantly different.

Our calculations were based upon projections of the Plan's cost and liabilities determined from the January 1, 2018 actuarial valuation and the unaudited financial data as of December 31, 2018 received from the Plan's auditor and/or investment consultant. While the scope of our engagement did not call for us to perform an audit or independent verification of this information, we have reviewed this information for reasonableness. The accuracy of the valuation results is dependent upon the accuracy and completeness of the underlying information, which is the responsibility of those who supply the data.

The actuary and the firm responsible for this report have no conflicts of interest that may impair the objectivity of our work. Richard Gabriel Associates does not practice law and therefore, cannot and does not provide legal advice.

I am a member of the American Academy of Actuaries and I meet the Qualification Standards to render the actuarial opinion contained herein. I certify, to the best of my knowledge and belief, that this actuarial certification is complete and accurate in accordance with Section 432 of the Internal Revenue Code and related IRS guidance.

Ronald C. Stokes

Ronald C. Stokes, FSA, MAAA
Enrolled Actuary No. 17-05287

3/29/2019
Date

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT I

Information on Scheduled Progress in Complying with Funding Improvement/Rehabilitation Plan as of January 1, 2019

Original 2010 Rehabilitation Plan

Due to the Plan's critical status, the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan adopted a Rehabilitation Plan on November 26, 2010. This original Rehabilitation Plan did not meet the targets of a regular Rehabilitation Plan, but it was intended to avoid insolvency. The Rehabilitation Period began on January 1, 2013 and will end on December 31, 2022. Since contribution increases of \$2.50 per shift per year, which were necessary to avoid a funding deficiency by the end of the Rehabilitation Period, would have meant substantial business hardship for the contributing employers, the Trustees adopted an extended Rehabilitation Plan, in which the Plan was expected to avoid insolvency.

The original Rehabilitation Plan provided for employer contribution increases to \$4.75 per shift in 2010 and future annual increases of \$0.90 per shift and the reduction of two adjustable benefits. Effective January 1, 2011, the normal form of benefit was reduced from a five year certain and life annuity to a life annuity and the disability retirement benefit was eliminated.

Amended 2012 Rehabilitation Plan

The Board of Trustees recognized in 2012 that the Pension Plan may not be able to avoid insolvency but that it may only be able to delay insolvency under all of the circumstances considered, including but not limited to National Publishing Company's stated intention to withdraw from the Plan in the absence of a modified Rehabilitation Plan with no contribution cost increase. After consulting with the Fund's actuary, on December 14, 2012, the Trustees adopted new Employer Contribution Schedules which are applicable for collective bargaining agreements renewed or extended after December 14, 2012.

Failure to Meet Scheduled Progress in 2015

The revised Rehabilitation Plan, as adopted on December 14, 2012, is insufficient to prevent insolvency. Based on projections as of January 1, 2013, the first day of the Rehabilitation Period, the Plan's projected insolvency date was May of 2020. Due primarily to unfavorable asset performance for the 2015 plan year (an estimated 1.0% return compared to the 7.5% assumed rate), as of January 1, 2016, the Plan was projected to become insolvent in April of 2020. Since the only goal of the Rehabilitation Plan was to delay insolvency beyond May of 2020, which was the projected insolvency date as of the beginning of the Rehabilitation Period, the Plan was certified as failing to make scheduled progress in 2015.

Failure to Meet Scheduled Progress in 2016

Based on projections as of January 1, 2017, the plan was expected to become insolvent in April of 2020, which is earlier than May of 2020 (the projected insolvency date determined at the beginning of the Rehabilitation Period). Therefore, the plan did not make scheduled progress under the Rehabilitation Plan in 2016. This was the second consecutive year that the plan was certified as failing to make scheduled progress under the Rehabilitation Plan.

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT I
(Page Two)

Amended 2017 Rehabilitation Plan

The Board of Trustees, at its meeting on October 18, 2017, updated the Rehabilitation Plan, effective for plan years beginning on or after January 1, 2017, to amend the annual standard for measuring scheduled progress such that scheduled progress is made if the plan does not become insolvent before 2020.

Met Scheduled Progress in 2017

With the plan's estimated asset return of 16.9% for the 2017 plan year (compared to the 7.5% assumed rate), based on projections as of December 31, 2017, the expected insolvency date advanced to June of 2020. Therefore, the plan was certified as making scheduled progress under the Rehabilitation Plan for the 2017 plan year.

Met Scheduled Progress in 2018

The unfavorable investment performance of 2018 (negative 3.1% compared to the 7.0% assumed rate) moved the projected insolvency date from June 2020 back to April of 2020. Since the plan is not projected to become insolvent before the first day of the 2020 plan year, the plan is being certified as making scheduled progress under the current Rehabilitation Plan for the 2018 plan year.

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT II

Determination of Actuarial Zone Status under IRC Section 432 for the Plan Year January 1, 2019 to December 31, 2019

CRITICAL STATUS

- Plan status is critical because at least one of the following conditions is met (ignoring effect of any amortization base extensions per the Pension Protection Act of 2006 but including effect of any amortization base extensions allowed under the Pension Relief Act of 2010):
- The plan is less than 65% funded and will become insolvent within seven years.
 - The plan is expected to have a funding deficiency within four years (within five years if the plan is less than 65% funded).
 - The plan's current year contributions are insufficient to pay the normal cost and interest on the unfunded accrued liability (i.e., infinite amortization period), the actuarial present value of vested benefits of inactive participants exceeds those of the active participants, and an accumulated funding deficiency is projected within five years.
 - The Fund will become insolvent within five years.
 - The Plan was previously in critical status and either a funding deficiency is projected within ten years (including effect of any amortization base extensions) or insolvency is projected within 31 years.
- Plan status is not critical but is projected to become critical in any of the five succeeding plan years. The plan sponsor has elected to treat the plan status as critical for the current plan year.

CRITICAL AND DECLINING STATUS

- Plan status is critical and declining because it is in critical status and insolvency is projected under the current rehabilitation plan in either:
- the current plan year or any of the succeeding 14 plan years; or
 - the current plan year or any of the succeeding 19 plan years, if the funded percentage is less than 80% or the ratio of inactive plan participants to active participants exceeds 2 to 1.

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT II

Determination of Actuarial Zone Status under IRC Section 432 for the Plan Year January 1, 2019 to December 31, 2019

ENDANGERED STATUS

- Plan status is endangered because the plan is not critical and one of the following conditions is met:
 - The plan is less than 80% funded.
 - A funding deficiency is projected within seven years.
- Plan status is seriously endangered because the plan is not critical and both of the above conditions are met.

NEITHER ENDANGERED NOR CRITICAL STATUS

- Plan status is neither endangered nor critical because none of the above conditions are met.
- The plan is in endangered status; however, the plan's status was neither endangered nor critical for the prior plan year, and the plan is projected to no longer be in endangered status as of the last day of the tenth succeeding plan year.

PROJECTION OF CRITICAL STATUS *(Not applicable for plan in critical status)*

- Plan status is projected to become critical in any one of the five succeeding plan years.
- Plan status is not projected to become critical in any of the five succeeding plan years.

ACTUARIAL STATUS DETERMINATION WORKSHEET

Under PPA Section 432 of the Internal Revenue Code
For the Plan Year January 1, 2019 to December 31, 2019

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND

EIN: 23-6209755 / PN: 001

EXHIBIT III - FOR 2019 ZONE CERTIFICATION

SHIFT CONTRIBUTION RATE = \$5.67 BLENDED ON 1/1/18 (\$5.50 FOR NATIONAL, \$6.55 FOR OTHER EMPLOYERS)
NATIONAL ASSUMED TO HAVE 83.5% OF TOTAL SHIFTS
ASSET PERFORMANCE IN 2019 & LATER: 7.00%
EST. MV ASSET RETURN FOR 2018 = -3.1%

PLAN STATUS: CRITICAL AND DECLINING IN 2019

(-65% FUNDED; FUNDING DEFICIENCY WITHIN 5 YEARS; INSOLVENCY WITHIN 20 YEARS)
PROJECTED INSOLVENCY IN APRIL 2020

BASED ON JANUARY 1, 2018 VALUATION - ENTRY AGE NORMAL COST METHOD

	CURRENT PLAN VALUATION 01/01/18	PROJECTED VALUATION 2019	PROJECTED VALUATION 2020	PROJECTED VALUATION 2021	PROJECTED VALUATION 2022	PROJECTED VALUATION 2023	PROJECTED VALUATION 2024	PROJECTED VALUATION 2025	PROJECTED VALUATION 2026	PROJECTED VALUATION 2027	PROJECTED VALUATION 2028	PROJECTED VALUATION 2029
(A) NUMBER OF PARTICIPANTS												
ACTIVE	144	144	144	144	144	144	144	144	144	144	144	144
TERMINATED VESTED	208	208	208	208	208	208	208	208	208	208	208	208
RETIRED	457	457	457	457	457	457	457	457	457	457	457	457
TOTAL	809	809	809	809	809	809	809	809	809	809	809	809
(B) ACTUARIAL ACCRUED LIABILITY												
ACTIVES	3,403,226	3,340,463	3,273,067	3,201,193	3,126,202	3,046,441	2,961,576	2,873,882	2,782,682	2,691,800	2,596,950	2,496,179
TERMINATED VESTED	2,112,764	2,073,800	2,031,960	1,987,339	1,940,784	1,891,268	1,838,562	1,784,141	1,727,522	1,671,102	1,612,218	1,549,658
RETIRED AND DISABLED	9,240,688	9,070,269	8,887,271	8,692,113	8,488,494	8,271,921	8,041,487	7,803,373	7,555,740	7,308,972	7,051,429	6,777,808
TOTAL	14,756,678	14,484,532	14,192,298	13,880,645	13,555,480	13,209,630	12,841,645	12,461,395	12,065,944	11,671,874	11,260,597	10,823,645
(C) PLAN ASSETS (MARKET VALUE)	2,756,882	1,508,449	338,530	-912,245	-2,242,270	-3,663,322	-5,181,772	-6,793,020	-8,505,638	-10,309,079	-12,228,380	-14,278,919
(C2) PLAN ASSETS (ACTUARIAL VALUE)	2,654,904	1,440,464	293,207	-942,460	-2,262,414	-3,676,751	-5,190,725	-6,798,989	-8,509,618	-10,311,731	-12,230,149	-14,280,098
(G3) EXPECTED AVA		1,566,275	285,786	-960,741	-2,274,601	-3,684,876	-5,196,141	-6,802,600	-8,512,025	-10,313,336	-12,231,219	-14,280,812
(D) UNFUNDED ACCRUED LIABILITY	12,101,774	13,044,068	13,899,091	14,823,106	15,817,895	16,886,381	18,032,370	19,260,384	20,575,562	21,963,605	23,490,746	25,103,744
(E) NORMAL COST (WITH EXPENSES)	161,438	161,438	161,438	161,438	161,438	161,438	161,438	161,438	161,438	161,438	161,438	161,438
(F) CONTRIBUTIONS												
MINIMUM REQUIRED	7,292,025	9,065,416	10,914,617	12,891,255	14,734,099	16,482,039	17,983,335	19,559,676	21,195,433	22,818,737	24,551,998	26,450,417
MAXIMUM DEDUCTIBLE	30,920,458	27,971,818	28,636,730	29,358,724	30,146,177	30,995,109	31,908,423	32,901,532	33,977,246	35,159,233	36,435,278	37,804,244
CONTRIBUTION RATE	5,670,000	5,670,000	5,670,000	5,670,000	5,670,000	5,670,000	5,670,000	5,670,000	5,670,000	5,670,000	5,670,000	5,670,000
EXPECTED SHIFTS	33,911	33,911	33,911	33,911	33,911	33,911	33,911	33,911	33,911	33,911	33,911	33,911
EXPECTED CONTRIBUTIONS	192,275	192,275	192,275	192,275	192,275	192,275	192,275	192,275	192,275	192,275	192,275	192,275
AMORTIZATION PERIOD IN YRS* (N/A=INFINITE)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
(G) PROJECTION VALUES												
CREDIT BALANCE	-5,448,555	-7,093,020	-8,866,411	-10,715,612	-12,692,250	-14,535,094	-16,283,034	-17,784,330	-19,360,671	-20,996,428	-22,619,732	-24,352,993
BENEFIT PAYMENTS	1,295,000	1,296,000	1,295,000	1,287,000	1,285,000	1,283,000	1,270,000	1,259,000	1,231,000	1,221,000	1,218,000	1,188,000
ADMINISTRATIVE EXPENSES	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000
PURE UNIT CREDIT NORMAL COST (NO EXPENSES)	97,710	97,710	97,710	97,710	97,710	97,710	97,710	97,710	97,710	97,710	97,710	97,710
NET FSA CHARGES/(CREDITS)	1,204,984	1,204,984	1,162,632	1,162,632	909,528	701,107	356,803	329,093	281,744	163,258	159,934	200,970
EXTRA FSA CHARGES/(CREDITS) FROM AVA=MVA	0	12,910	10,096	8,220	6,970	6,136	5,580	5,210	4,963	4,798	4,688	4,615
(H) PV OF ACCUM. BENEFITS												
VESTED	14,340,921	14,106,421	13,854,469	13,585,918	13,306,863	13,010,348	12,695,151	12,371,371	12,036,332	11,706,873	11,364,722	11,001,732
NONVESTED	13,758	13,533	13,291	13,034	12,766	12,482	12,179	11,869	11,547	11,231	10,903	10,555
TOTAL	14,354,679	14,119,954	13,867,761	13,598,951	13,319,629	13,022,830	12,707,331	12,383,239	12,047,879	11,718,104	11,375,625	11,012,286
(I) FUNDED PERCENTAGE												
VESTED	19.2%	10.7%	2.4%	-6.7%	-16.9%	-28.2%	-40.8%	-54.9%	-70.7%	-88.1%	-107.6%	-129.8%
TOTAL (AVA/PVAB)	18.5%	10.2%	2.1%	-6.9%	-17.0%	-28.2%	-40.8%	-54.9%	-70.6%	-88.0%	-107.5%	-129.7%
(J) UNFUNDED VESTED BENEFITS	11,584,039	12,597,972	13,515,939	14,498,162	15,549,133	16,673,671	17,876,923	19,164,391	20,541,970	22,015,952	23,593,103	25,280,651

* CONTRIBUTIONS ASSUMED TO BE MADE ON JULY 1 OF PLAN YEAR.

PREPARED BY RICHARD GABRIEL ASSOCIATES
MARCH 28, 2019

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT IV

Assumptions for Actuarial Status Certification as of January 1, 2019

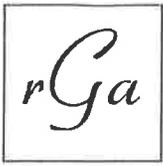
The data and assumptions used in determining the Plan's status as of January 1, 2019, as shown on the Actuarial Status Determination Worksheet (Exhibit III), are as follows:

- The projections of the Plan's cost and liabilities were based on projections of the January 1, 2018 actuarial valuation results, using the actuarial assumptions and plan provisions as listed in Appendix A and Appendix B of the January 1, 2018 actuarial valuation report (dated September 25, 2018), respectively;
- The projections of the Plan's assets were based on the Plan's unaudited financial data as of December 31, 2018 received from the Plan's auditor and/or investment consultant;
- The projected funded percentages were determined using the unit credit cost method; and
- The projected contributions assume the terms of the collective bargaining agreements for the current plan year will remain in effect for succeeding plan years.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**Actuarial Valuation
as of January 1, 2020**

richard Gabriel associates
Employee Benefits Consultants and Actuaries



richard Gabriel associates

Employee Benefits Consultants and Actuaries

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601 Dresher Road, Suite 201

Horsham, Pennsylvania 19044-2203

October 7, 2020

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
601 Dresher Road, Suite 201
Horsham, PA 19044

Dear Board of Trustees:

This letter presents the results of our actuarial valuation of the Bindery Industry Employers GCC/IBT Pension Plan as of January 1, 2020. The valuation was based on the plan provisions in effect on that date.

The financial data was provided by the plan's auditor and the basic participant data by the plan administrator. The actuarial values were calculated by us on the basis of this data, our interpretation of the plan provisions, and the actuarial assumptions as disclosed in Appendix A. Highlights of the valuation appear in the Executive Summary.

The actuarial experience of the plan since the last valuation was more favorable than anticipated by the actuarial assumptions, producing a net actuarial gain of \$722,535. A liability gain of approximately \$721,500 occurred due to more than expected deaths and terminations and a gain of approximately \$1,000 was attributable to favorable asset performance in 2019, on an actuarial value basis. The plan assets earned 7.1% in 2019 on an actuarial value basis and 17.3% on a market value basis, compared to the assumed rate of return of 7.0%.

In order to better reflect actual experience of this plan and reasonable future expectations, we have made the following change to the actuarial assumptions:

- The assumed interest rate was reduced from 7.00% to 2.12% for 20 years and 2.26% thereafter, which mirrors the PBGC interest assumption for terminated plans in effect as of the current valuation date.

This change increased the plan's unfunded accrued liability by \$8,150,575.

The minimum required contribution has increased from \$9,035,381 in 2019 to \$10,856,200 in 2020 due to the plan's accumulated funding deficiency. The funding deficiency has increased from \$7,096,620 as of December 31, 2018 to \$8,851,421 as of December 31, 2019. The maximum deductible contribution is \$29,029,339 for the 2020 plan year.

The expected contributions of \$50,016 for the 2020 plan year are insufficient to meet the minimum funding requirements. Since the plan is in critical and declining status, the 5% penalty tax under IRC Section 4971(a)(2) is not applicable as long as the plan is operating under a rehabilitation plan. However, per IRC Section 4971(g)(3)(B), the IRS may impose a penalty tax on the accumulated funding deficiency if a plan does not make scheduled progress under a rehabilitation plan for a 3-consecutive year period.

The plan became insolvent on April 1, 2020 and began receiving financial assistance from the PBGC. Per the Rehabilitation Plan, as last amended on October 18, 2017, scheduled progress is met if insolvency did not occur before 2020. Since the plan did not become insolvent before the first day of the 2020 plan year, the plan was certified as making scheduled progress for the 2019 plan year.

Since the plan is less than 65% funded as of January 1, 2020, a funding deficiency has already occurred, and insolvency is projected within 20 years, the plan status remained critical and declining for 2020. Due to the plan's insolvency and financial support from the PBGC, zone certifications are not required after 2020 and the Rehabilitation Plan ended upon insolvency.

A common measure of the level of funding of a pension plan is the ratio of the market value of plan assets to the value of accrued benefits. This ratio is 2.0% as compared to 10.8% on the last valuation. The decrease in this ratio occurred because the benefit payments are reducing the plan assets by a larger percentage than they reduce the liabilities. The above-mentioned assumption change significantly increased the liabilities.

ACTUARIAL CERTIFICATION

The information and results contained in this actuarial valuation report as of January 1, 2020 were prepared for the use of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and its auditors. The actuarial computations made are for purposes of determining the plan's funding requirements and accounting disclosures under FASB Accounting Standards Codification 960 (ASC 960). The report has been prepared for the purposes outlined herein and should not be relied upon for any other purpose. Determinations for purposes other than meeting the plan's funding and financial accounting requirements may be significantly different than the results presented in this report. To avoid misrepresentation, the report is intended to be used in its entirety.

Our calculations were based upon the participant data as of December 31, 2019, as provided by the plan's administrator, and the financial data as of December 31, 2019 received from the plan's auditor. While the scope of our engagement did not call for us to perform an audit or independent verification of this information, we have reviewed this information for reasonableness. The accuracy of the results is dependent upon the accuracy and completeness of the underlying information, which is the responsibility of those who supply the data.

The actuarial cost method and assumptions, other than those prescribed by law or regulations, are selected by the actuary. In our opinion, the actuarial methods used are appropriate for the purposes of the valuation, and each economic assumption (other than those prescribed by law or regulation) was selected from a range which represents our best estimate of anticipated experience under the plan.

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
October 7, 2020
Page Three

Furthermore, the demographic assumptions used, in the aggregate, are reasonable (taking into account the experience of the plan and reasonable expectations). In our opinion, the actuarial methods used are appropriate for purposes of the valuation and the actuarial assumptions used represent our best estimate of anticipated experience of this group.

Future actuarial measurements may differ significantly from current measurements presented in this report due to such factors as the following: plan experience different from that anticipated by the economic or demographic assumptions, changes in economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for these measurements (such as the end of an amortization period or additional cost or contribution requirements based on the plan's funded status) and changes in plan provisions, accounting standards or applicable law. Due to the limited scope of the actuary's assignment, the actuary did not perform an analysis of the potential range of such future measurements.

We certify this report has been prepared in accordance with generally accepted actuarial principles and practices and, to the best of our knowledge, fairly presents the actuarial position of the plan as of January 1, 2020. The actuary and the firm responsible for this report have no conflicts of interest that may impair the objectivity of our work. We further certify that we meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.

Sincerely,



Ronald C. Stokes
F.S.A., M.A.A.A.
Enrolled Actuary No. 20-05287

RCS/vmd

binsreport2020-nc.wpd

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

EXECUTIVE SUMMARY

A summary of the principal results of the current and preceding actuarial valuations follows:

	<u>January 1, 2020</u>	<u>January 1, 2019</u>
(A) Number of participants		
• Active	31	135
• Vested terminated	247	203
• Retired and disabled	<u>455</u>	<u>446</u>
• Total	733	784
(B) Normal cost	\$ 155,006	\$ 160,771
(C) Unfunded accrued liability at the beginning of the plan year	\$21,058,487	\$12,749,890
(D) Various contribution levels		
• Contribution rate per shift	\$ 6.55	\$ 5.67
• Expected contribution	\$ 50,016	\$ 183,249
• Actual contribution	To be determined	\$ 177,739
• Minimum required contribution as of the end of the plan year	\$10,856,200	\$ 9,035,381
• Maximum deductible contribution	\$29,029,339	\$30,414,680
• Amortization period	Infinite	Infinite
(E) Plan assets at the beginning of the plan year		
• Market value	\$ 436,930	\$ 1,503,084
• Actuarial value	\$ 427,480	\$ 1,579,236
(F) Value of accumulated plan benefits at the beginning of the plan year		
• Vested	\$21,337,651	\$13,969,049
• Nonvested	<u>13,867</u>	<u>6,947</u>
• Total	\$21,351,518	\$13,975,996
(G) Unfunded vested benefits	\$20,900,721	\$12,465,965
(H) Plan assets as a percentage of accumulated benefits		
• Market value	2.0%	10.8%
• Actuarial value	2.0%	11.3%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

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**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

I. PLAN ASSETS

(per Audit)

(A) Statement of plan assets as of December 31, 2019 at market value

Cash and equivalents	\$ 441,247
Mutual funds - Fixed income	33
Employers' contributions receivable	14,223
Accrued income	601
Prepaid expenses	<u>1,895</u>
Total assets	\$ 457,999
Administrative expenses payable	<u>(21,069)</u>
Net assets available for benefits	\$ 436,930

(B) Statement of changes in plan assets (market value)

Receipts	
Employers' contributions	\$ 177,739
Interest and dividends	20,198
Net realized and unrealized gains/(losses)	<u>138,890</u>
Total receipts	\$ 336,827
Disbursements	
Benefit payments	\$ 1,269,377
Administrative expenses	128,604
Investment expenses	<u>5,000</u>
Total disbursements	\$ 1,402,981
Net receipts	\$(1,066,154)
Plan assets	
January 1, 2019	\$ 1,503,084
December 31, 2019	\$ 436,930

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Determination of actuarial value of assets as of January 1, 2020

(1)	Actuarial value of Fund assets at January 1, 2019	\$ 1,579,236
(2)	(1) x 1.07	\$ 1,689,783
(3)	Contributions to the Fund during year	\$ 177,739
(4)	Interest on (3) from date of payment to December 31, 2019 at 7.0% per annum*	\$ 6,221
(5)	Disbursements (excluding investment expenses)	\$ 1,397,981
(6)	Interest on (5) to December 31, 2019 at 7.0% per annum**	\$ 53,007
(7)	Expected actuarial value at December 31, 2019 = (2) + (3) + (4) - (5) - (6)	\$ 422,755
(8)	Market value of Fund assets at December 31, 2019	\$ 436,930
(9)	Difference between market value and expected actuarial value = (8) - (7)	\$ 14,175
(10)	Preliminary actuarial value of assets = (7) + 1/3 of (9)	\$ 427,480
(11)	(8) x 1.20	\$ 524,316
(12)	(8) x 0.80	\$ 349,544
(13)	Actuarial value of Fund assets at January 1, 2020 = (10), but not more than (11) or less than (12)	\$ 427,480

(D) Valuation assets

For purposes of this valuation, the actuarial value of plan assets in (C)(13) of \$427,480 is used.

(E) Asset returns

Rate of return on market value of plan assets (net of investment expenses)	17.3%
Rate of return on actuarial value of plan assets (net of investment expenses)	7.1%

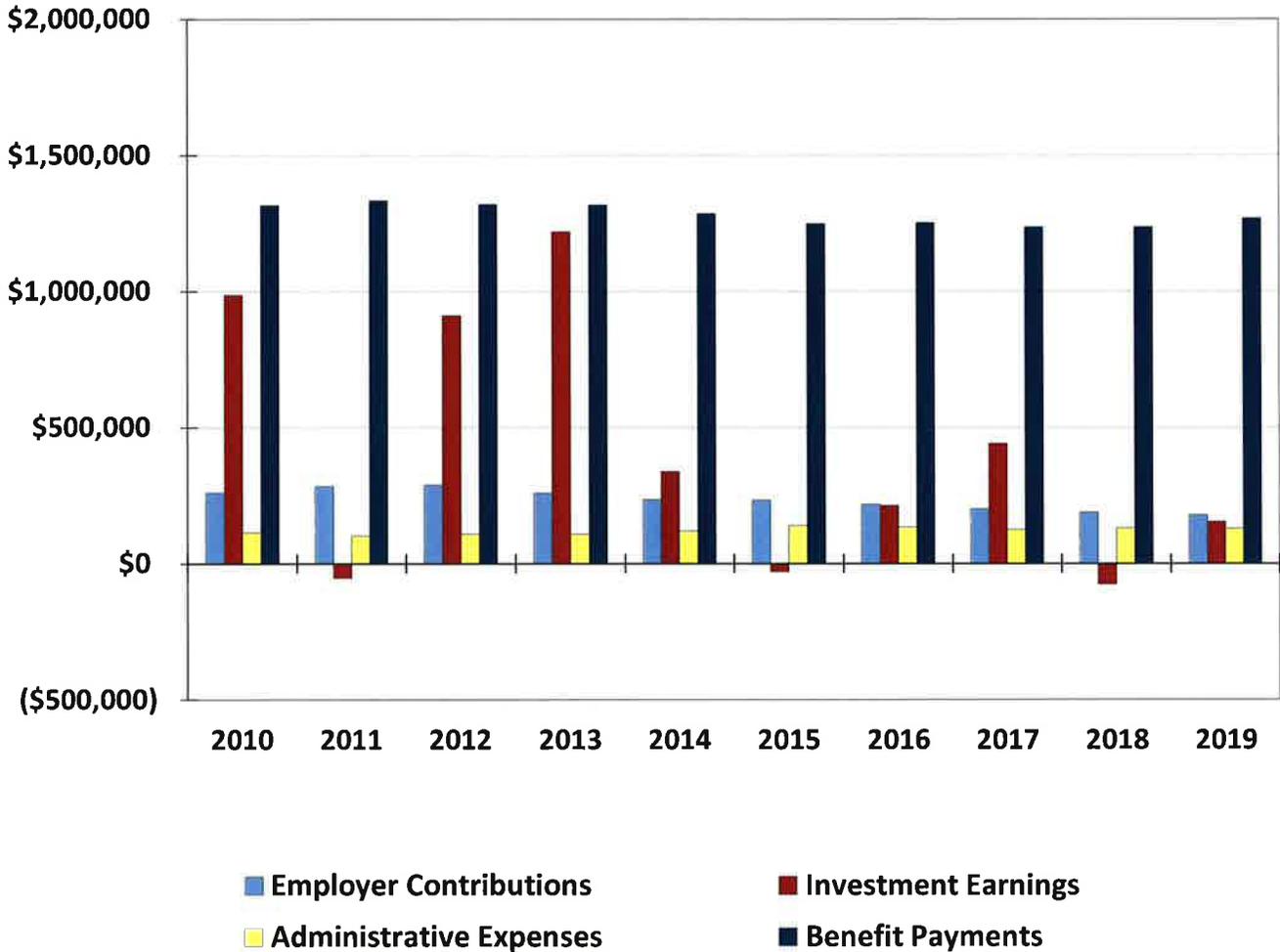
*Assumes that contributions occur on July 1, on average.

**Assumes disbursements are paid on the first day of the month.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART I

**HISTORY OF RECEIPTS AND DISBURSEMENTS
FOR PLAN YEARS ENDING DECEMBER 31**



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

II. UNFUNDED ACCRUED LIABILITY

(A)	Unfunded accrued liability as of January 1, 2019	\$ 12,749,890
(B)	Normal cost for the plan year (with expenses)	\$ 160,771
(C)	Interest on (A) and (B) for one year	\$ 903,746
(D)	Contributions on account of the plan year	\$ 177,739
(E)	Interest on (D) from the dates paid to the end of the plan year*	\$ 6,221
(F)	Expected unfunded accrued liability as of January 1, 2020 = (A) + (B) + (C) - (D) - (E)	\$ 13,630,447
(G)	Actual unfunded accrued liability as of January 1, 2020, before change	\$ 12,907,912
(H)	Actuarial gain (loss) = (F) - (G)	\$ 722,535
(I)	Change in unfunded accrued liability due to assumption change	\$ 8,150,575
(J)	Unfunded accrued liability as of January 1, 2020, after change = (G) + (I)	\$ 21,058,487

*Contributions are assumed paid on July 1, 2019, on average.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**III. FUNDING STANDARD ACCOUNT
(Plan year ending December 31, 2019)**

(A)	Charges to Funding Standard Account	
(1)	Prior year funding deficiency	\$ 7,096,620
(2)	Normal cost for the plan year (with expenses)	160,771
(3)	Amortization charges (on \$6,701,859)	1,332,825
(4)	Interest on (1), (2) and (3)	<u>601,315</u>
(5)	Total charges	\$ 9,191,531
(B)	Credits to Funding Standard Account	
(1)	Prior year credit balance	\$ 0
(2)	Contributions for the plan year	177,739
(3)	Amortization credits (on \$1,048,589)	145,935
(4)	Interest on (1), (2) and (3)	<u>16,436</u>
(5)	Total credits	\$ 340,110
(C)	Credit balance (funding deficiency) as of December 31, 2019 = (B)(5) - (A)(5)	\$(8,851,421)

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IV. SUMMARY OF VALUATION RESULTS

All values shown are as of January 1, 2020

(A)	Normal cost (with expenses)	\$ 155,006
(B)	Accrued liability	
(1)	Present value of all benefits payable in future years:	
(a)	Active participants (31)	\$ 1,426,738
(b)	Vested terminated participants (247)	6,854,574
(c)	Retired participants (455)	<u>13,427,075</u>
(d)	Total (733)	\$ 21,708,387
(2)	Present value of future normal costs	\$ 222,420
(3)	Accrued liability = (1)(d) - (2)	\$ 21,485,967
(C)	Valuation assets	\$ 427,480
(D)	Unfunded accrued liability = (B)(3) - (C), but not less than zero	\$ 21,058,487

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

V. DEVELOPMENT OF CONTRIBUTION LEVELS

(A)	The minimum required contribution to avoid a funding deficiency in the funding standard account for the 2020 plan year is determined as follows:	
(1)	Charges to Funding Standard Account	
(a)	Prior year funding deficiency	\$ 8,851,421
(b)	Normal cost for the plan year	155,006
(c)	Amortization charges (on \$13,895,441)	1,803,792
(d)	Interest on (a), (b) and (c)	<u>229,177</u>
(e)	Total charges	\$11,039,396
(2)	Credits to Funding Standard Account	
(a)	Prior year credit balance	\$ 0
(b)	Amortization credits (on \$1,688,375)	179,393
(c)	Interest on (a) and (b)	<u>3,803</u>
(d)	Total credits	\$ 183,196
(3)	Minimum required contribution to be made at the end of the plan year equals excess, if any, of (1)(e) over (2)(d)	\$10,856,200

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(B)	The maximum deductible contribution for the plan year ending December 31, 2020 is determined as follows:	
(1)	Normal cost for the plan year	\$ 155,006
(2)	10 year amortization of unfunded actuarial accrued liability	2,310,137
(3)	Interest on (1) and (2)	<u>52,261</u>
(4)	Total	\$ 2,517,404
(5)	Minimum required contribution = (A)(3)	\$ 10,856,200
(6)	Full funding limitation = (C)(3)	\$ 21,663,219
(7)	Tax deductible limit equals (4), but not less than (5), nor more than (6); or (C)(2)(e), if greater	\$ 29,029,339
(C)	Development of full funding limitation for maximum deductible purposes	
(1)	Based on accrued liability	
(a)	Accrued liability (including normal cost)	\$ 21,640,973
(b)	Applicable assets (lesser of actuarial or market value)	\$ 427,480
(c)	Full funding limitation at end of year = [(a) - (b)] x 1.0212, but not less than zero	\$ 21,663,219
(2)	Based on 90% of RPA 94 current liability*	
(a)	Current liability projected to end of year	\$ 20,735,242
(b)	90% of (a)	\$ 18,661,718
(c)	Applicable assets projected to end of year	\$ 0
(d)	Full funding limitation = (b) - (c), but not less than zero	\$ 18,661,718
(e)	Unfunded current liability = [1.4 x (a)] - (c), but not less than zero	\$ 29,029,339
(3)	Full funding limit = greater of (1)(c) or (2)(d)	\$ 21,663,219

* Based on 2.95% interest, the RP-2014 Mortality Table with projected improvements for all healthy participants, and other assumptions as described in Appendix A.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(D) Schedule of amortization bases

<u>Why Established</u>	<u>Date Established</u>	<u>Initial Amount</u>	<u>Outstanding Balance</u>	<u>Years Remaining</u>	<u>Charge (Credit)</u>
Initial base	1/1/1977	\$ N/A	\$ 459,712	2	\$ 232,267
Plan amendment	3/1/1985	N/A	4,142	0.2	4,142
Plan amendment	1/1/1988	N/A	430,077	3.0	146,377
Plan amendment	1/1/1989	N/A	99,590	4.0	25,686
Plan amendment	1/1/1991	N/A	124,834	6.0	21,912
Plan amendment	1/1/1992	N/A	358,604	7.0	54,509
Assumption change	1/1/1994	N/A	51,888	4.0	13,383
Plan amendment	1/1/1998	N/A	65,348	13.0	5,684
Plan amendment	1/1/2001	N/A	642,573	16.0	46,785
Actuarial loss	1/1/2002	N/A	48,529	2.0	24,519
Plan amendment	1/1/2002	N/A	271,947	17.0	18,820
Actuarial loss	1/1/2003	N/A	184,051	3.0	62,642
Actuarial loss	1/1/2004	N/A	44,337	4.0	11,435
Actuarial loss	1/1/2005	233,248	87,303	5.0	18,201
Actuarial loss	1/1/2006	336,011	149,006	6.0	26,155
Actuarial gain	1/1/2007	(91,813)	(18,591)	2.0	(9,393)
Actuarial gain	1/1/2008	(98,446)	(28,876)	3.0	(9,828)
Actuarial loss	1/1/2009	2,784,110	1,052,051	4.0	271,346
Actuarial loss	1/1/2010	75,068	34,269	5.0	7,144
Actuarial loss	1/1/2011	141,739	75,077	6.0	13,178
Plan amendment	1/1/2011	(202,795)	(107,421)	6.0	(18,855)
Actuarial loss	1/1/2012	232,919	139,228	7.0	21,163
Assumption change	1/1/2012	310,195	185,426	7.0	28,185
Actuarial loss	1/1/2013	102,851	67,996	8.0	9,136
Assumption change	1/1/2013	(70,724)	(46,756)	8.0	(6,283)
Actuarial gain	1/1/2014	(397,300)	(286,078)	9.0	(34,518)
Actuarial gain	1/1/2015	(151,251)	(117,205)	10.0	(12,858)
Assumption change	1/1/2015	694,920	538,498	10.0	59,074
Actuarial gain	1/1/2016	(142,718)	(117,878)	11.0	(11,875)
Actuarial loss	1/1/2017	87,021	76,007	12.0	7,090
Actuarial gain	1/1/2018	(80,329)	(73,711)	13.0	(6,411)
Assumption change	1/1/2018	604,140	554,373	13.0	48,215
Actuarial gain	1/1/2019	(176,342)	(169,324)	14.0	(13,812)
Actuarial gain	1/1/2020	(722,535)	(722,535)	15.0	(55,560)
Assumption change	1/1/2020	8,150,575	<u>8,150,575</u>	15.0	<u>626,744</u>
Total			\$ 12,207,066		\$ 1,624,399

Notes:

- (1) Outstanding balances are shown as of January 1, 2020, before any payments on account of the plan year.
- (2) Net outstanding balance of \$12,207,066 less credit balance/(funding deficiency) of \$(8,851,421) equals the unfunded accrued liability of \$21,058,487.
- (3) The years remaining for certain charge bases established on or before January 1, 2008 (including the initial base, actuarial losses and plan amendments) reflect the 5-year automatic extension effective January 1, 2008 approved by the IRS on March 18, 2009.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VI. ACTUARIAL PRESENT VALUE OF ACCUMULATED PLAN BENEFITS

(A) Actuarial Present Value of Accumulated Plan Benefits as of January 1, 2020

(1)	Vested benefits	
	(a) Retired participants and beneficiaries receiving payments (455)	\$ 13,427,075
	(b) Terminated vested participants (247)	6,854,574
	(c) Active participants (27)	<u>1,056,002</u>
	(d) Total (729)	<u>\$ 21,337,651</u>
(2)	Nonvested benefits (4)	<u>13,867</u>
(3)	Total accumulated plan benefits (733)	\$ 21,351,518
(4)	Plan assets (market value)	\$ 436,930
(5)	Unfunded vested benefits = (1)(d) - (4)	\$ 20,900,721
(6)	Plan assets as a percentage of the value of vested benefits = (4) ÷ (1)(d)	2.0%

(B) Change in Actuarial Present Value of Accumulated Plan Benefits

(1)	Actuarial present value of accumulated plan benefits as of January 1, 2019	\$ 13,975,996
(2)	Increase (decrease) during the year attributable to:	
	(a) Plan amendment	\$ 0
	(b) Change in actuarial assumptions	8,104,938
	(c) Benefits accumulated and actuarial (gains)/losses	(393,931)
	(d) Increase for interest due to the decrease in the discount period	933,892
	(e) Benefits paid	<u>(1,269,377)</u>
	(f) Net increase (decrease)	<u>\$ 7,375,522</u>
(3)	Actuarial present value of accumulated plan benefits as of January 1, 2020	\$ 21,351,518

Note: The present values shown above were calculated in accordance with Interpretations 1 and 2 of the American Academy of Actuaries. The assumed investment rate of return is based on an interest assumption of 2.12% for 20 years and 2.26% thereafter.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART II

COMPARISON OF LIABILITIES TO ASSETS FOR PLAN YEARS BEGINNING JANUARY 1

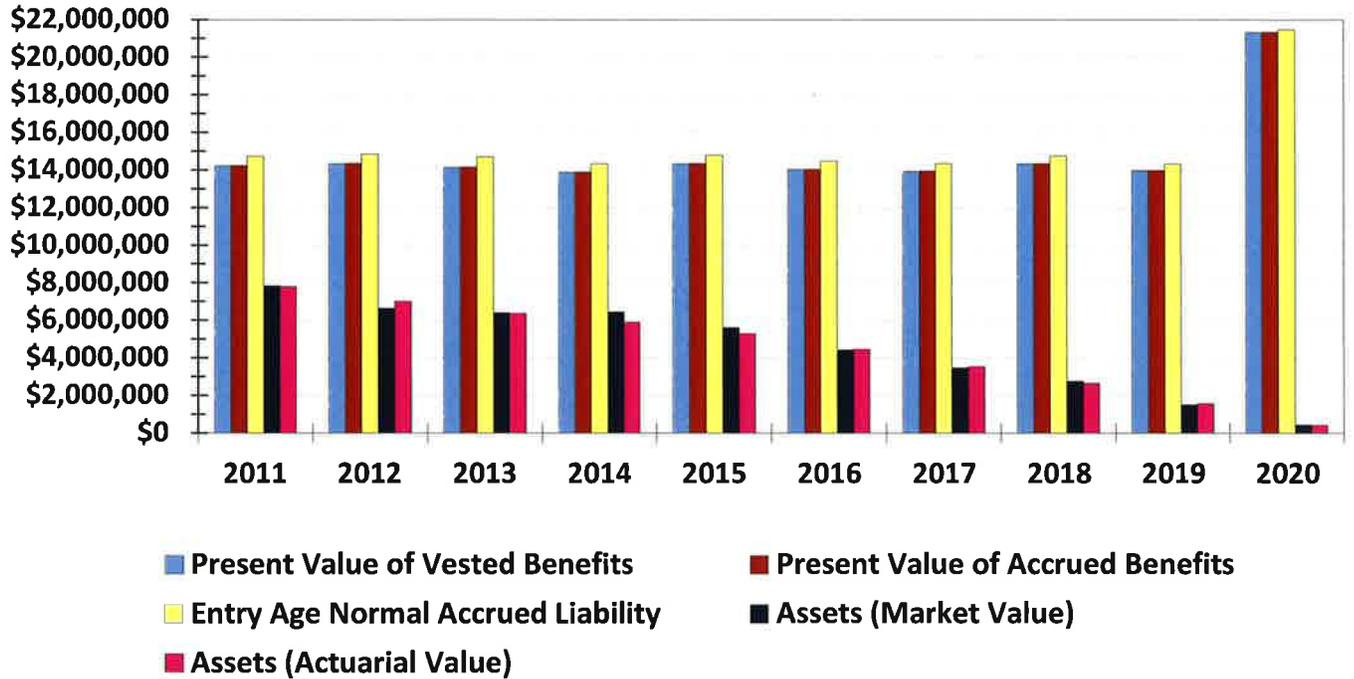
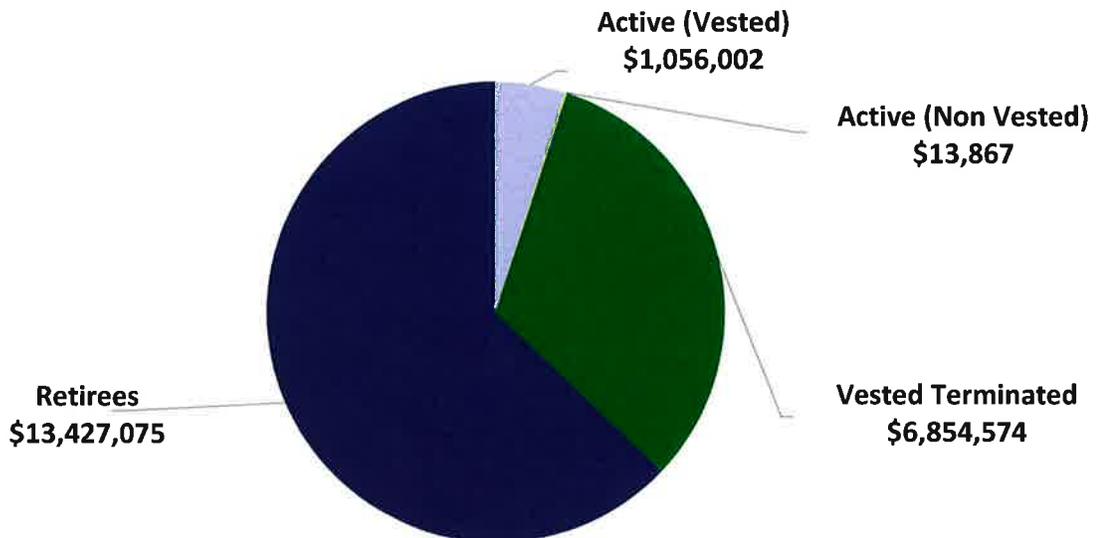


CHART III

BREAKDOWN OF PRESENT VALUE OF ACCUMULATED BENEFITS BY CATEGORY



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Unfunded Vested Benefits (Presumptive Method)

<u>Date</u>	<u>Vested Benefits Interest Rate</u>	<u>Value of Vested Benefits</u>	<u>Asset Value⁽¹⁾</u>	<u>Unfunded Vested Benefits⁽²⁾</u>
12/31/2000	8.0%	\$ 13,161,490	\$ 13,765,888	\$ (604,398)
12/31/2001	8.0%	13,729,764	12,855,490	874,274
12/31/2002	8.0%	13,966,603	11,234,306	2,732,297
12/31/2003	7.5%	14,352,701	12,245,649	2,107,052
12/31/2004	7.5%	14,617,090	12,500,580	2,116,510
12/31/2005	7.5%	14,525,963	12,170,594	2,355,369
12/31/2006	7.5%	14,482,705	12,569,788	1,912,917
12/31/2007	7.5%	14,391,719	12,337,060	2,054,659
12/31/2008	7.5%	14,644,094	7,591,676	7,052,418
12/31/2009	7.5%	14,419,795	8,014,810	6,404,985
12/31/2010	7.5%	14,402,684 ⁽³⁾	7,831,775	6,570,909
12/31/2011	7.5%	14,511,116 ⁽³⁾	6,626,197	7,884,919
12/31/2012	7.5%	14,306,141 ⁽³⁾	6,398,374	7,907,767
12/31/2013	7.5%	14,033,278 ⁽³⁾	6,451,692	7,581,586
12/31/2014 ⁽⁴⁾	7.5%	13,811,434 ⁽³⁾	5,618,297	8,193,137
12/31/2015	7.5%	14,171,573 ⁽³⁾	4,430,843	9,740,730
12/31/2016	7.5%	14,059,344 ⁽³⁾	3,475,390	10,583,954
12/31/2017	7.5%	13,881,391 ⁽³⁾	2,756,882	11,124,509
12/31/2018	7.0%	14,078,232 ⁽³⁾	1,503,084	12,575,148
12/31/2019	7.0%	13,337,287 ⁽³⁾	436,930	12,900,357

Employer Withdrawal Liability is expected for any employer who withdraws from the plan prior to January 1, 2021.

Notes:

- (1) Asset values are market values.
- (2) The amount of Unfunded Vested Benefits is obtained by subtracting the market value of the plan assets from the value of vested benefits determined using ongoing plan assumptions as outlined in Appendix A.
- (3) Includes the additional value of vested adjustable benefits as of January 1, 2011 of \$182,312. For withdrawal liability purposes, this amount is being amortized over 15 years.
- (4) Effective December 31, 2014, excludes effect of any assumption changes effective on the first day of the next plan year.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VII. PROJECTED PENSION PAYMENTS

<u>Year</u>	<u>Number of Recipients</u>	<u>Amount</u>
2020	457	\$ 1,267,000
2021	436	1,245,000
2022	415	1,229,000
2023	394	1,214,000
2024	374	1,188,000
2025	354	1,169,000
2026	334	1,128,000
2027	313	1,119,000
2028	293	1,115,000
2029	273	1,096,000

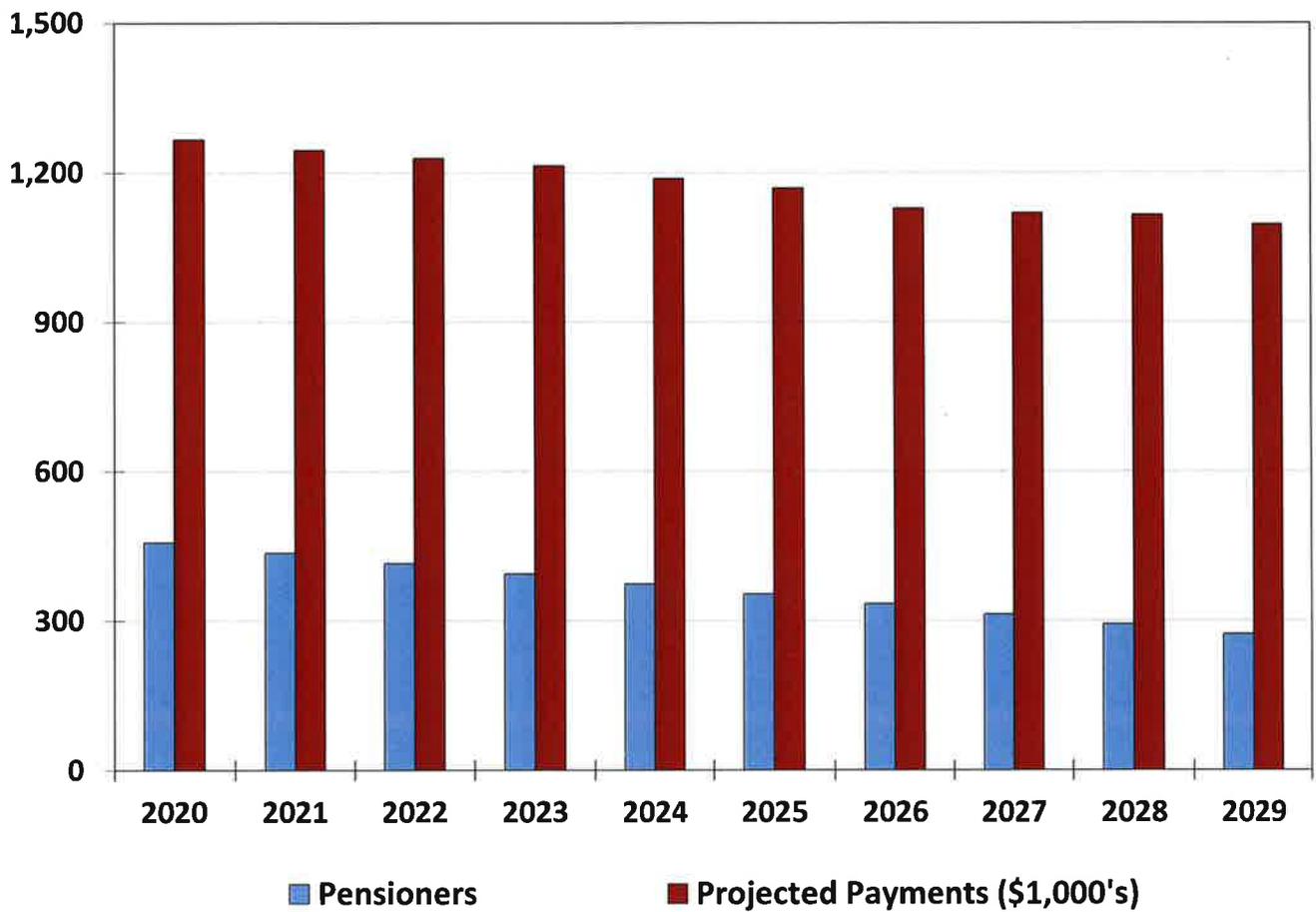
Notes:

- (1) Survivorship is based on the valuation assumptions.
- (2) For actives and those who have terminated with a vested deferred pension, this projection reflects only normal retirement pension benefits commencing at the normal retirement age. All current pension recipients are included.
- (3) No payments resulting from future terminations, disablements or deaths are reflected.
- (4) It is assumed that no future new entrants will be eligible for pension benefits during the next ten years.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART IV

PROJECTED PENSIONERS AND ANNUAL PENSION PAYMENTS



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VIII. PARTICIPANT DATA

**TABLE 1. DISTRIBUTION OF ACTIVE PARTICIPANTS
BY AGE AND SERVICE GROUPS**

As of January 1, 2020

Age Last Birthday	Completed Years of Credited Service									Total
	1-4	5-9	10-14	15-19	20-24	25-29	30-34	35-39	40+	
Under 25										0
25 - 29										0
30 - 34	1		1							2
35 - 39	1		1							2
40 - 44					3					3
45 - 49		1		1		1				3
50 - 54	1		3							4
55 - 59	1		1	1	1	2		2		8
60 - 64	1		1			2	1	1	2	8
65 - 69			1							1
70 & over										0
Total	5	1	8	2	4	5	1	3	2	31

Note: No active participant has less than one year of benefit service.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**TABLE 2. DISTRIBUTION OF INACTIVE PARTICIPANTS
BY AGE GROUP**

Terminated Vested Participants and Beneficiaries with Rights to Future Benefits

<u>Age Last Birthday</u>	<u>Number of Participants</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 30	1	\$ 58.80	\$ 58.80
30 - 34	3	331.80	110.60
35 - 39	11	1,178.80	107.16
40 - 44	23	4,089.40	177.80
45 - 49	24	3,546.43	147.77
50 - 54	57	11,219.51	196.83
55 - 59	68	14,242.02	209.44
60 - 64	42	11,126.59	264.92
65 & over	<u>18</u>	<u>3,798.55</u>	<u>211.03</u>
Total	247	\$49,591.90	\$200.78

Normal, Early & Disability Retirements and Beneficiaries

<u>Age Last Birthday</u>	<u>Number of Participants*</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 55	3	\$ 387.23	\$129.08
55 - 59	13	1,741.01	133.92
60 - 64	41	8,620.82	210.26
65 - 69	85	23,527.37	276.79
70 - 74	71	19,082.85	268.77
75 - 79	91	21,959.68	241.32
80 - 84	76	18,818.34	247.61
85 - 89	39	8,107.55	207.89
90 & over	<u>38</u>	<u>4,986.81</u>	<u>131.23</u>
Total	457	\$107,231.66	\$234.64

*Includes two alternate payees under a qualified domestic relations order (QDRO).

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IX. SUMMARY OF PARTICIPANT DATA

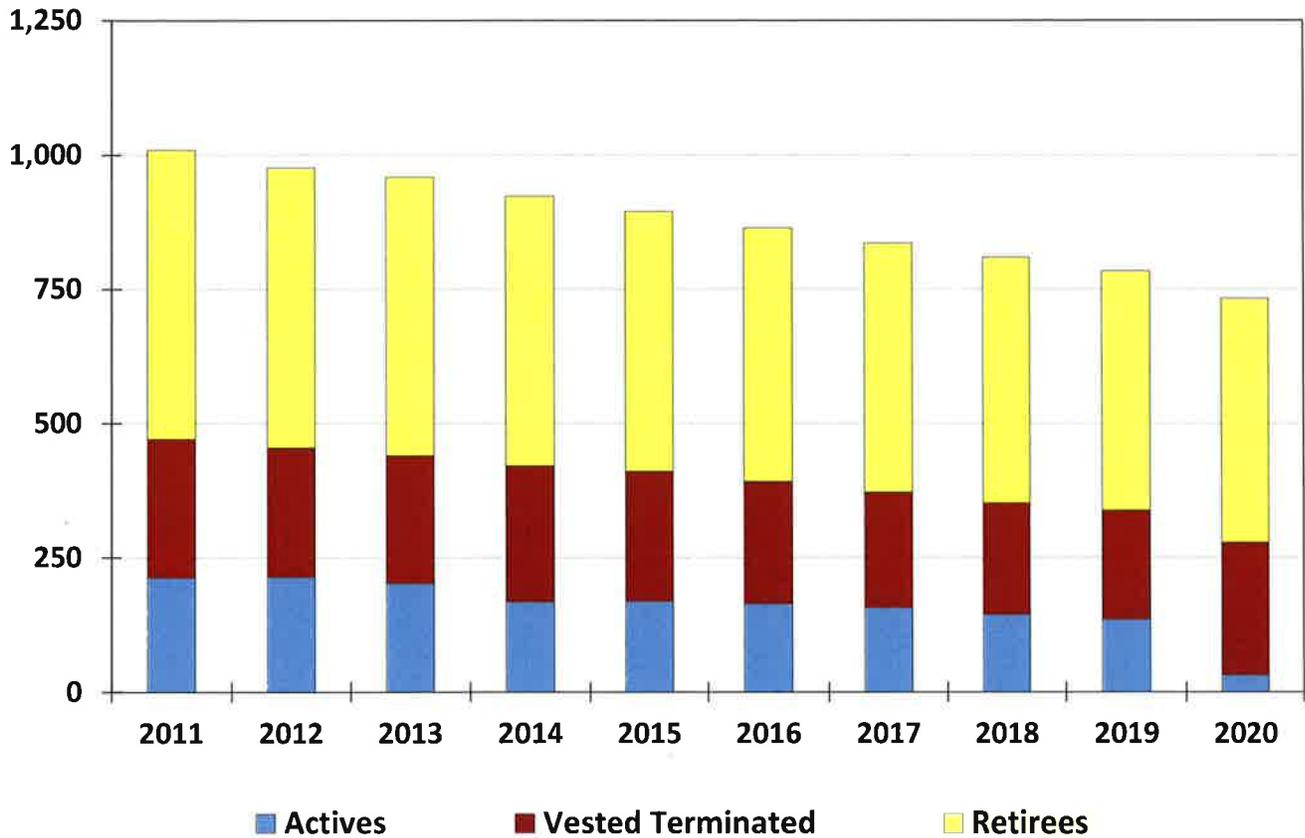
	<u>January 1, 2020</u>	<u>January 1, 2019</u>
(A) Active Participants		
(1) Number	31	135
(2) Average benefit service to date	19.6	21.0
(3) Average attained age	52.8	54.5
(4) Accrued annual pension		
(a) Total	\$ 94,794	\$ 449,276
(b) Average	\$ 3,058	\$ 3,328
(5) Projected annual pension		
(a) Total	\$ 150,833	\$ 665,074
(b) Average	\$ 4,866	\$ 4,926
(B) Vested terminated participants		
(1) Number	247	203
(2) Accrued annual pension		
(a) Total	\$ 589,389	\$ 407,524
(b) Average	\$ 2,386	\$ 2,008
(C) Disabled pensioners		
(1) Number	29	32
(2) Annual pension		
(a) Total	\$ 93,742	\$ 97,309
(b) Average	\$ 3,232	\$ 3,041
(D) Other pensioners and beneficiaries		
(1) Number	428*	416*
(2) Annual pension		
(a) Total	\$1,193,037	\$1,113,181
(b) Average	\$ 2,787	\$ 2,676

* Two participants are both a pensioner and a beneficiary. Pensioners include two alternate payees under a qualified domestic relations order (QDRO).

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART V

PARTICIPANT CENSUS COMPARISON



	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
Actives	213	214	202	168	169	164	157	144	135	31
Vested Terminated	258	241	238	253	242	228	215	208	203	247
Retirees	538	521	519	502	484	472	464	457	446	455

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

X. RECONCILIATION OF CENSUS DATA

	<u>Actives</u>	<u>Terminated Vesteds</u>	<u>Retirees, Disabled Retirees and Beneficiaries*</u>	<u>Total</u>
Participants as of 1/1/2019	135	203	448	786
New participants	1	0	0	1
Reemployed participants	1	(1)	0	0
Nonvested terminations	(4)	0	0	(4)
Vested terminations	(77)	77	0	0
Retirements	(23)	(16)	39	0
Deaths with beneficiary	0	0	(3)	(3)
Deaths without beneficiary	(2)	(14)	(30)	(46)
Deaths with lump sum paid	0	(2)	0	(2)
New beneficiaries	0	0	3	3
Other (new QDRO Alternate Payee)	0	0	0	0
Benefits expired	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Participants as of 1/1/2020	31	247	457	735

*Retirees include two alternate payees under a qualified domestic relations order (QDRO) as of January 1, 2019 and January 1, 2020.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

ACTUARIAL METHODS AND ASSUMPTIONS

(A) Actuarial cost method

Entry age normal.

(B) Asset valuation method

Plan assets are valued using an actuarial smoothing method. Beginning with the January 1, 1995 plan year, the actuarial value of assets as of each valuation date is equal to the prior plan year's actuarial value adjusted to reflect contributions and disbursements, and then increased to reflect interest at the assumed investment rate. This value is then adjusted, up or down, by one-third of the difference between such value and the actual market value. In no event will the actuarial value of assets be less than 80% or more than 120% of the actual market value.

(C) Persons included

Based on data provided to us, all persons entitled to coverage under the plan as of the valuation date are included in the calculations.

(D) Significant actuarial assumptions

(1) Investment return

2.12% for 20 years and 2.26% thereafter, net of investment expenses.

(2) Retirement rates

<u>Age</u>	<u>Rate</u>
55 - 61	2%
62	15%
63	10%
64	10%
65	40%
66 - 69	33%
70	100%

Terminated vested participants are assumed to retire at age 65 or the valuation date, if later. Spouses of deceased terminated vested participants are assumed to retire when the participant would have attained age 65.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(3) Mortality

The following headcount-weighted RPH-2014 Mortality Tables (Male/Female) are used:

- (a) Pre-retirement - RPH-2014 Blue Collar Employee Mortality Table with a one-year setback to reflect expected mortality improvement.
- (b) Post-retirement

Not disabled: RPH-2014 Blue Collar Healthy Annuitant Mortality Table with a one-year setforward (reduced from a prior two-year setforward) to reflect expected mortality improvement.

Disabled lives: 150% of the RPH-2014 Disabled Retiree Mortality Table.

(4) Withdrawal from service

- (a) Select rates are used in the first 5 years of service.

<u>Years of Service</u>	<u>Rate</u>
0	30%
1	20%
2	15%
3	15%
4	13%

- (b) After 5 years of service, turnover rates vary by attained age.

<u>Age</u>	<u>Rate</u>
25	8%
30	7%
35	7%
40	6%
45	6%
50	6%
55	3%
60	3%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(5) Disability

100% of the rates developed in a 1955 study of experience among several large industrial employee groups.

(6) Hours of work

It was assumed that each participant will work the same number of shifts in each future year that he worked in the most recent plan year.

(7) Allowance for other expenses

Administrative expenses payable from the trust are assumed to be covered by a \$125,000 addition to the normal cost.

(8) Expected employer contributions

Employees are assumed to work the same number of shifts in future years that they worked in the most recent plan year. At an annual rate of 7,636 shifts (the 2019 total for actives) and the contribution rate of \$6.55 per shift for the remaining employer), expected contributions are \$50,016 for 2020.

(9) Marriage

It was assumed that 80% of active and terminated vested participants are married with females assumed to be three years younger than males.

(10) Terminated vested participants

Terminated vested participants over age 70 are assigned a 50% probability of collecting their benefits.

(E) Data qualifications

If the date of birth was missing, the participant was assumed to be hired at age 30.

(F) Change in actuarial methods and assumptions

The actuarial methods and assumptions are the same as those used in the prior valuation except as follows:

- The assumed interest rate was reduced from 7.00% to 2.12% for 20 years and 2.26% thereafter, which mirrors the PBGC interest assumption for terminated plans in effect as of the current valuation date.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(G) Justification for changes in actuarial methods and/or assumptions

- At the October 1, 2019 Board of Trustees meeting, due to the plan's impending insolvency, the Trustees approved the sale of all current investments and the investment of the proceeds in money market funds, which currently have very low yields.
- The plan has not terminated nor has a mass withdrawal been declared by the Board of Trustees. However, the plan became insolvent as of April 1, 2020 and is now receiving financial assistance from the PBGC. The PBGC quarterly payments to the plan are just sufficient to cover benefits and expenses. Consequently, with the low value of assets, the investment return is minimal.
- Since this plan is age-heavy with only one small contributing employer remaining, the liquidity of assets needed to pay the pension benefits provides no opportunity for long-term investment.
- Plan termination interest rate assumptions, which reflect rates at which annuities could be currently purchased, are now the best measure of the plan's liabilities.

(H) Basis for selection of demographic assumptions

Demographic assumptions are based on national tables, as periodically updated, which are determined by the actuary to be appropriate for this plan. In the case of assumptions for which the experience of the plan is credible, plan experience is used. For example, administrative expenses are determined from recent experience, per the plan audit. The retirement assumption is determined from plan experience. These assumptions are periodically adjusted in light of developing experience.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

PLAN SUMMARY

(As of January 1, 2020, prior to insolvency)

(A) Effective date and plan year

The effective date of the plan is January 1, 1962. As part of the Rehabilitation Plan, adjustable benefits were reduced effective January 1, 2011, including the change to the normal form of benefits from a five year certain and life annuity to a life annuity and the elimination of the disability benefit.

The plan year is the calendar year.

(B) Eligibility for coverage

An employee who is a member of an Eligible Employee Classification becomes a participant in the plan on the first day of the month coincident with or next following the completion of one year of service. Journeymen Bookbinders become participants on the date of covered employment.

(C) Employee contributions

None.

(D) Normal retirement date

The normal retirement date is the first day of the month coincident with or next following the later of the attainment of age 65 or the 5th anniversary of plan participation. A participant cannot retire prior to participating in the plan for at least 5 years.

(E) Employment after normal retirement date

If employment continues beyond the normal retirement date, pension payments will not commence until actual retirement. However, pension payments will commence no later than April 1 of the calendar year following the year in which the participant attains age 70-1/2, if employment continues beyond such date. Additional pension credits continue to accrue until the actual retirement date.

(F) Break in service

A temporary break in service occurs if less than 60 shifts are worked in two consecutive plan years and less than 52 shifts in at least one of them. No break shall occur, however, during periods of authorized leaves of absence, military service, sickness, accident or job-protected leave under the Family Medical Leave Act of 1993. A temporary break in service becomes a

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

permanent break in service when the period of temporary break equals or exceeds the greater of five years or credited service accumulated prior to the temporary break. A permanent break results in forfeiture of all credited service unless the participant has at least 5 years of vesting service.

(G) Credited service

Benefit accrual - one full year is credited for each plan year in which the participant is credited with at least 220 shifts. Fractional years are credited in years in which a participant works fewer than 220 shifts. Credited service is reduced by 1/10 for each 22 shifts less than 220 that the participant works in each plan year. No service credit is counted until a participant has completed two years of continuous service. Once two years of continuous service have been earned, service is retroactively credited.

Vesting - one year of Vesting Service is credited for each plan year in which at least 103 shifts (equivalent of 750 hours) are credited. No partial years are credited for vesting purposes.

(H) Normal retirement pension

- (1) Eligibility requirements - must be a participant at Normal Retirement Date and retire on or after that date.
- (2) Monthly pension - \$14.00 per month per year of Credited Service with no maximum on service.

(I) Early retirement pension

- (1) Eligibility requirements - must have reached age 55 with at least 5 years of Vesting Service.
- (2) Monthly pension - The normal retirement pension accrued to the early retirement date reduced by ½% for each month that the early retirement date precedes the Normal Retirement Date.

(J) Disability retirement pension

- (1) Effective for disability eligibility prior to January 1, 2011
 - (a) Eligibility requirements - must have at least 5 years of Credited Service. The disability must be total and permanent as defined in the plan and the participant must be entitled to a Social Security disability pension award.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(b) Monthly pension - the normal retirement pension accrued to the date of disability, unreduced for early commencement and payable as of the effective date of the Social Security disability award.

(2) Effective January 1, 2011, the disability retirement pension is eliminated for participants who meet the eligibility requirements in (J)(1)(a) on and after January 1, 2011.

(K) Benefits payable on other termination of employment

(1) Eligibility requirements - must have completed 5 or more years of Vesting Service.

(2) Monthly pension - the normal retirement pension accrued to the date of termination reduced for early commencement as in (I)(2), if applicable.

(L) Pre-retirement death benefit

(1) Eligibility requirements - an active or terminated vested participant who has completed 5 years of Vesting Service.

(2) Nonmarried participant - lump sum payment equal to \$108 per year that contributions were made between January 1, 1962 and December 31, 1973, plus \$126 per year that contributions were made between January 1, 1974 and December 31, 1975 plus \$157.50 per year that contributions were made on and after January 1, 1976. The maximum single sum payable is \$5,512.50, subject to any restrictions under Code Section 432(f)(2).

(3) Married participant - If eligible for early retirement at death, the eligible spouse will receive a monthly benefit equal to 50% of the normal retirement pension computed as of the date of death, reduced for early commencement as if the participant had retired the day before his death. If younger than early retirement age at death, the benefit will be determined as of the date of death but reduced as if he had retired at the earliest retirement age and further reduced as if the participant had elected the continuation to the spouse under the 50% joint and survivor annuity. If the value of this benefit is less than the lump sum death benefit in (2) above, the excess will be paid to the surviving spouse in a lump sum.

Monthly payments commence on the first day of the month following the later of the participant's death or the month the participant would have attained early retirement age and will be payable during the surviving spouse's lifetime.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(M) Normal and optional forms of payment

(1) Normal form

(a) Married participant - automatic surviving spouse annuity providing a reduced pension payable to the retired participant during his lifetime with 50% continuing monthly for the life of his surviving spouse after his death. This is automatic unless the participant elects otherwise with the consent of his spouse.

(b) Single participant (for benefits commencing on or after January 1, 2011) - life annuity.

(2) Optional forms

(a) 75% Joint and Survivor Annuity - a reduced amount of pension is payable to the retired participant during his lifetime with the provision that after his death 75% of such reduced benefit shall continue to and for the lifetime of his eligible surviving spouse.

(b) Five Year Certain and Life Annuity (for benefits commencing on or after January 1, 2011) A reduced pension is payable to the retired participant during his lifetime, with the provision that if his death occurs before he has received 60 monthly payments, such payments will continue to his designated beneficiary until a total of 60 monthly payments have been made.

(3) Lump sum - payable if the actuarially equivalent present value of the vested accrued benefit is \$2,500 or less.

(N) Suspension of benefits

The retirement benefit otherwise payable to a pensioner shall be permanently suspended for each calendar month in which the pensioner completes 40 or more hours of service in the bookbinding industry, in an occupation in which the pensioner was employed at any time under the plan, and in the geographic area covered by the plan (as defined in Department of Labor Regulations Section 2530.203-3) at the time payment of benefits to the pensioner commenced.

(O) Increases for retired participants

(1) Effective October 1, 1987 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on October 1, 1987 received a 10% increase in his monthly benefit.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

- (2) Effective January 1, 1992 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 1992 received a 10% increase in his monthly benefit.
- (3) Effective January 1, 2002 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 2002 received a 5% increase in his monthly benefit.

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richard Gabriel associates

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601 Dresher Road, Suite 201

Horsham, Pennsylvania 19044-2203

**ANNUAL MULTIEMPLOYER PLAN
ACTUARIAL STATUS CERTIFICATION
UNDER SECTION 432 OF THE INTERNAL REVENUE CODE**

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

Name, Address and Telephone Number of Plan Sponsor:

Board of Trustees
Bindery Industry Employers GCC/IBT Pension Plan
601 Dresher Road, Suite 201
Horsham, PA 19044
Telephone: (215) 773-0900

Plan Year of Certification: January 1, 2020 - December 31, 2020

Plan Status: Critical and declining

Actuarial Certification: This Actuarial Status Certification as of January 1, 2020 was prepared for the use of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and for IRS reporting purposes. The attached **Exhibit I** describes the scheduled progress in meeting the requirements of a funding improvement or rehabilitation plan, if applicable. The attached **Exhibits II and III** provide information supporting and qualifying the actuarial status determination.

The actuarial computations and projections made are for purposes of determining the Plan's actuarial status in accordance with Section 432 of the Internal Revenue Code and related IRS guidance and should not be relied upon for any other purpose. The attached **Exhibit IV** summarizes the data used and assumptions made for these actuarial computations and projections. Determinations for purposes other than determining the Plan's zone status may be significantly different.

Our calculations were based upon projections of the Plan's cost and liabilities determined from the January 1, 2019 actuarial valuation and the unaudited financial data as of December 31, 2019 received from the Plan's auditor and/or investment consultant. While the scope of our engagement did not call for us to perform an audit or independent verification of this information, we have reviewed this information for reasonableness. The accuracy of the valuation results is dependent upon the accuracy and completeness of the underlying information, which is the responsibility of those who supply the data.

The actuary and the firm responsible for this report have no conflicts of interest that may impair the objectivity of our work. Richard Gabriel Associates does not practice law and therefore, cannot and does not provide legal advice.

I am a member of the American Academy of Actuaries and I meet the Qualification Standards to render the actuarial opinion contained herein. I certify, to the best of my knowledge and belief, that this actuarial certification is complete and accurate in accordance with Section 432 of the Internal Revenue Code and related IRS guidance.

Ronald C. Stokes
Ronald C. Stokes, FSA, MAAA
Enrolled Actuary No. 17-05287

3/30/2020
Date

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT I

Information on Scheduled Progress in Complying with Funding Improvement/Rehabilitation Plan as of January 1, 2020

Original 2010 Rehabilitation Plan

Due to the Plan's critical status, the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan adopted a Rehabilitation Plan on November 26, 2010. This original Rehabilitation Plan did not meet the targets of a regular Rehabilitation Plan, but it was intended to avoid insolvency. The Rehabilitation Period began on January 1, 2013 and was projected to end on December 31, 2022. Since contribution increases of \$2.50 per shift per year, which were necessary to avoid a funding deficiency by the end of the Rehabilitation Period, would have meant substantial business hardship for the contributing employers, the Trustees adopted an extended Rehabilitation Plan, in which the Plan was expected to avoid insolvency.

The original Rehabilitation Plan provided for employer contribution increases to \$4.75 per shift in 2010 and future annual increases of \$0.90 per shift and the reduction of two adjustable benefits. Effective January 1, 2011, the normal form of benefit was reduced from a five year certain and life annuity to a life annuity and the disability retirement benefit was eliminated.

Amended 2012 Rehabilitation Plan

The Board of Trustees recognized in 2012 that the Pension Plan may not be able to avoid insolvency but that it may only be able to delay insolvency under all of the circumstances considered, including but not limited to National Publishing Company's stated intention to withdraw from the Plan in the absence of a modified Rehabilitation Plan with no contribution cost increase. After consulting with the Fund's actuary, on December 14, 2012, the Trustees adopted new Employer Contribution Schedules which are applicable for collective bargaining agreements renewed or extended after December 14, 2012.

Failure to Meet Scheduled Progress in 2015

The revised Rehabilitation Plan, as adopted on December 14, 2012, was not expected to prevent insolvency. Based on projections as of January 1, 2013, the first day of the Rehabilitation Period, the Plan's projected insolvency date was May of 2020. Due primarily to unfavorable asset performance for the 2015 plan year (an estimated 1.0% return compared to the 7.5% assumed rate), as of January 1, 2016, the Plan was projected to become insolvent in April of 2020. Since the only goal of the Rehabilitation Plan was to delay insolvency beyond May of 2020, which was the projected insolvency date as of the beginning of the Rehabilitation Period, the Plan was certified as failing to make scheduled progress in 2015.

Failure to Meet Scheduled Progress in 2016

Based on projections as of January 1, 2017, the plan was expected to become insolvent in April of 2020, which is earlier than May of 2020 (the projected insolvency date determined at the beginning of the Rehabilitation Period). Therefore, the plan did not make scheduled progress under the Rehabilitation Plan in 2016. This was the second consecutive year that the plan was certified as failing to make scheduled progress under the Rehabilitation Plan.

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT I
(Page Two)

Amended 2017 Rehabilitation Plan

The Board of Trustees, at its meeting on October 18, 2017, updated the Rehabilitation Plan, effective for plan years beginning on or after January 1, 2017, to amend the annual standard for measuring scheduled progress such that scheduled progress is made if the plan does not become insolvent before 2020.

Met Scheduled Progress in 2017

With the plan's estimated asset return of 16.9% for the 2017 plan year (compared to the 7.5% assumed rate), based on projections as of December 31, 2017, the expected insolvency date advanced to June of 2020. Therefore, the plan was certified as making scheduled progress under the Rehabilitation Plan for the 2017 plan year.

Met Scheduled Progress in 2018

The unfavorable investment performance of 2018 (negative 3.1% compared to the 7.0% assumed rate) moved the projected insolvency date from June 2020 back to April of 2020. Since the plan is not projected to become insolvent before the first day of the 2020 plan year, the plan is being certified as making scheduled progress under the current Rehabilitation Plan for the 2018 plan year.

Met Scheduled Progress in 2019

Based on the unaudited plan assets of \$441,882 as of January 1, 2020 and projections of the plan's liabilities and costs from the January 1, 2019 actuarial valuation, with adjustments to reflect the closing of a large employer (National Publishing Company) in December 2019, the plan's projected date of insolvency is April of 2020. Since the plan did not become insolvent before the first day of the 2020 plan year, the plan is being certified as making scheduled progress under the current Rehabilitation Plan for the 2019 plan year.

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT II

Determination of Actuarial Zone Status under IRC Section 432 for the Plan Year January 1, 2020 to December 31, 2020

CRITICAL STATUS

- Plan status is critical because at least one of the following conditions is met (ignoring effect of any amortization base extensions per the Pension Protection Act of 2006 but including effect of any amortization base extensions allowed under the Pension Relief Act of 2010):
- The plan is less than 65% funded and will become insolvent within seven years.
 - The plan is expected to have a funding deficiency within four years (within five years if the plan is less than 65% funded).
 - The plan's current year contributions are insufficient to pay the normal cost and interest on the unfunded accrued liability (i.e., infinite amortization period), the actuarial present value of vested benefits of inactive participants exceeds those of the active participants, and an accumulated funding deficiency is projected within five years.
 - The Fund will become insolvent within five years.
 - The Plan was previously in critical status and either a funding deficiency is projected within ten years (including effect of any amortization base extensions) or insolvency is projected within 31 years.
 - Plan status is not critical but is projected to become critical in any of the five succeeding plan years. The plan sponsor has elected to treat the plan status as critical for the current plan year.

CRITICAL AND DECLINING STATUS

- Plan status is critical and declining because it is in critical status and insolvency is projected under the current rehabilitation plan in either:
- the current plan year or any of the succeeding 14 plan years; or
 - the current plan year or any of the succeeding 19 plan years, if the funded percentage is less than 80% or the ratio of inactive plan participants to active participants exceeds 2 to 1.

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT II

Determination of Actuarial Zone Status under IRC Section 432 for the Plan Year January 1, 2020 to December 31, 2020

ENDANGERED STATUS

- Plan status is endangered because the plan is not critical and one of the following conditions is met:
 - The plan is less than 80% funded.
 - A funding deficiency is projected within seven years.
- Plan status is seriously endangered because the plan is not critical and both of the above conditions are met.

NEITHER ENDANGERED NOR CRITICAL STATUS

- Plan status is neither endangered nor critical because none of the above conditions are met.
- The plan is in endangered status; however, the plan's status was neither endangered nor critical for the prior plan year, and the plan is projected to no longer be in endangered status as of the last day of the tenth succeeding plan year.

PROJECTION OF CRITICAL STATUS *(Not applicable for plan in critical status)*

- Plan status is projected to become critical in any one of the five succeeding plan years.
- Plan status is not projected to become critical in any of the five succeeding plan years.

ACTUARIAL STATUS DETERMINATION WORKSHEET

Under PPA Section 432 of the Internal Revenue Code
For the Plan Year January 1, 2020 to December 31, 2020

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
EIN: 23-6209755 / PN: 001

BASED ON JANUARY 1, 2019 VALUATION – ENTRY AGE NORMAL COST METHOD
(WITH ADJUSTMENTS FOR THE CLOSING OF A LARGE EMPLOYER AT THE END OF 2019)

EXHIBIT III - FOR 2020 ZONE CERTIFICATION

SHIFT CONTRIBUTION RATE = \$5.67 BLENDED ON 1/1/19 (\$5.50 FOR NATIONAL, \$6.55 FOR OTHER EMPLOYERS)

AND \$6.55 EFFECTIVE 1/1/2020

ASSET PERFORMANCE IN 2020 & LATER: 7.00%

DRAFT CENSUS AS OF 1/1/2020 REFLECTS NATIONAL CLOSING IN DECEMBER 2019

PLAN STATUS: CRITICAL AND DECLINING IN 2020

(<65% FUNDED; FUNDING DEFICIENCY WITHIN 5 YEARS; INSOLVENCY WITHIN 20 YEARS)

PROJECTED INSOLVENCY IN APRIL 2020

	CURRENT PLAN VALUATION 01/01/19	PROJECTED VALUATION 2020	PROJECTED VALUATION 2021	PROJECTED VALUATION 2022	PROJECTED VALUATION 2023	PROJECTED VALUATION 2024	PROJECTED VALUATION 2025	PROJECTED VALUATION 2026	PROJECTED VALUATION 2027	PROJECTED VALUATION 2028	PROJECTED VALUATION 2029	PROJECTED VALUATION 2030
(A) NUMBER OF PARTICIPANTS												
ACTIVE	135	29	29	29	29	29	29	29	29	29	29	29
TERMINATED VESTED	203	245	245	245	245	245	245	245	245	245	245	245
RETIRED	446	456	456	456	456	456	456	456	456	456	456	456
TOTAL	784	730	730	730	730	730	730	730	730	730	730	730
(B) ACTUARIAL ACCRUED LIABILITY												
ACTIVES	3,134,029	541,261	526,577	509,911	492,115	473,104	453,361	432,733	411,973	390,304	367,382	344,095
TERMINATED VESTED	2,195,515	3,267,509	3,178,865	3,078,254	2,970,820	2,856,053	2,736,868	2,612,344	2,487,015	2,356,204	2,217,831	2,077,251
RETIRED AND DISABLED	8,999,582	9,508,829	9,250,864	8,958,076	8,645,431	8,311,444	7,964,601	7,602,224	7,237,503	6,856,825	6,454,146	6,045,041
TOTAL	14,329,126	13,317,599	12,956,305	12,546,241	12,108,366	11,640,601	11,154,829	10,647,301	10,136,491	9,603,333	9,039,359	8,466,388
(C) PLAN ASSETS (MARKET VALUE)												
	1,503,084	441,882	-924,213	-2,409,413	-3,997,685	-5,696,374	-7,499,235	-9,416,048	-11,434,793	-13,581,441	-15,871,850	-18,292,106
(C2) PLAN ASSETS (ACTUARIAL VALUE)												
	1,579,236	492,650	-890,367	-2,386,850	-3,982,642	-5,686,346	-7,492,549	-9,411,591	-11,431,822	-13,579,460	-15,870,529	-18,291,225
(C3) EXPECTED AVA												
		417,385	-869,891	-2,373,199	-3,973,542	-5,680,279	-7,488,504	-9,408,894	-11,430,024	-13,578,262	-15,869,730	-18,290,693
(D) UNFUNDED ACCRUED LIABILITY												
	12,749,890	12,824,949	13,846,672	14,933,091	16,091,008	17,326,947	18,647,378	20,058,892	21,568,312	23,182,793	24,909,888	26,757,614
(E) NORMAL COST (WITH EXPENSES)												
	160,771	132,497	132,497	132,497	132,497	132,497	132,497	132,497	132,497	132,497	132,497	132,497
(F) CONTRIBUTIONS												
MINIMUM REQUIRED	9,035,381	10,823,082	12,904,841	14,863,001	16,736,219	18,372,825	20,094,786	21,886,918	23,677,917	25,590,861	27,681,707	29,962,879
MAXIMUM DEDUCTIBLE	30,414,680	26,949,149	27,644,835	28,357,803	29,116,894	29,926,771	30,806,532	31,759,182	32,811,032	33,949,797	35,174,611	36,516,499
CONTRIBUTION RATE	5.67000	6.55000	6.55000	6.55000	6.55000	6.55000	6.55000	6.55000	6.55000	6.55000	6.55000	6.55000
EXPECTED SHIFTS	32,319	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000
EXPECTED CONTRIBUTIONS	183,249	32,750	32,750	32,750	32,750	32,750	32,750	32,750	32,750	32,750	32,750	32,750
AMORTIZATION PERIOD IN YRS* (NA=INFINITE)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
(G) PROJECTION VALUES												
CREDIT BALANCE	-7,096,620	-8,845,718	-10,789,186	-12,870,945	-14,829,104	-16,702,323	-18,338,928	-20,060,890	-21,853,022	-23,644,021	-25,556,965	-27,647,811
BENEFIT PAYMENTS	1,284,000	1,254,000	1,276,622	1,275,761	1,275,028	1,260,829	1,249,029	1,217,962	1,205,043	1,198,775	1,169,408	1,147,710
ADMINISTRATIVE EXPENSES	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000
PURE UNIT CREDIT NORMAL COST (NO EXPENSES)	88,087	18,891	18,891	18,891	18,891	18,891	18,891	18,891	18,891	18,891	18,891	18,891
NET FSA CHARGES/(CREDITS)-NOT UPDATED	1,186,890	1,144,538	1,144,538	891,434	683,013	338,709	310,999	263,650	145,164	141,840	182,876	223,912
EXTRA FSA CHARGES/(CREDITS) FROM AVA>MVA	0	(7,723)	(5,622)	(4,221)	(3,287)	(2,665)	(2,250)	(1,973)	(1,789)	(1,666)	(1,584)	(1,529)
(H) PV OF ACCUM. BENEFITS												
VESTED	13,969,049	13,226,477	12,871,515	12,468,236	12,037,621	11,577,623	11,100,156	10,601,510	10,100,190	9,577,181	9,024,064	8,462,698
NONVESTED	6,947	5,361	5,217	5,054	4,879	4,693	4,499	4,297	4,094	3,882	3,658	3,430
TOTAL	13,975,996	13,231,838	12,876,733	12,473,290	12,042,500	11,582,316	11,104,656	10,605,807	10,104,284	9,581,063	9,027,722	8,466,128
(I) FUNDED PERCENTAGE												
VESTED	10.8%	3.3%	-7.2%	-19.3%	-33.2%	-49.2%	-67.6%	-88.8%	-113.2%	-141.8%	-175.9%	-216.1%
TOTAL (AVA/PVAB)	11.3%	3.7%	-6.9%	-19.1%	-33.1%	-49.1%	-67.5%	-88.7%	-113.1%	-141.7%	-175.8%	-216.1%
(M) UNFUNDED VESTED BENEFITS												
	12,465,965	12,784,595	13,795,728	14,877,650	16,035,306	17,273,997	18,599,391	20,017,557	21,534,983	23,158,622	24,895,914	26,754,803

* CONTRIBUTIONS ASSUMED TO BE MADE ON JULY 1 OF PLAN YEAR.

PREPARED BY RICHARD GABRIEL ASSOCIATES
MARCH 30, 2020

Name of Plan: Bindery Industry Employers GCC/IBT Pension Plan
Employer Identification Number: 23-6209755
Plan Number: 001

ACTUARIAL STATUS CERTIFICATION - EXHIBIT IV

Assumptions for Actuarial Status Certification as of January 1, 2020

The data and assumptions used in determining the Plan's status as of January 1, 2020, as shown on the Actuarial Status Determination Worksheet (Exhibit III), are as follows:

- The projections of the Plan's cost and liabilities were based on projections of the January 1, 2019 actuarial valuation results (with adjustments to reflect the closing of a large employer, National Publishing Company, in December 2019), using the actuarial assumptions and plan provisions as listed in Appendix A and Appendix B of the January 1, 2019 actuarial valuation report (dated September 27, 2019), respectively;
- The projections of the Plan's assets were based on the Plan's unaudited financial data as of December 31, 2019 received from the Plan's auditor and/or investment consultant;
- The projected funded percentages were determined using the unit credit cost method; and
- The projected contributions assume the terms of the collective bargaining agreements for the current plan year will remain in effect for succeeding plan years.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**Actuarial Valuation
as of January 1, 2021
(Revised)**

richard Gabriel associates
Employee Benefits Consultants and Actuaries



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Employee Benefits Consultants and Actuaries

601 Dresher Road, Suite 201

Horsham, Pennsylvania 19044-2203

September 28, 2022

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
601 Dresher Road, Suite 201
Horsham, PA 19044

Dear Board of Trustees:

This letter presents the results of our revised actuarial valuation of the Bindery Industry Employers GCC/IBT Pension Plan as of January 1, 2021. The revised valuation reflects the results from a change in our valuation software.

The plan became insolvent on April 1, 2020 and began receiving financial assistance from the Pension Benefit Guaranty Corporation (PBGC). The valuation was based on the plan provisions in effect on January 1, 2021 and reflects the reduction of benefits to the PBGC maximum guaranteed level.

The financial data was provided by the plan's auditor and the basic participant data by the plan administrator. The actuarial values were calculated by us on the basis of this data, our interpretation of the plan provisions, and the actuarial assumptions as disclosed in Appendix A. Highlights of the valuation appear in the Executive Summary.

The actuarial experience of the plan since the last valuation was more favorable than anticipated by the actuarial assumptions, producing a net actuarial gain of \$907,523. This gain was due almost entirely to the PBGC financial assistance of \$1,416,200 received in 2020 after the plan became insolvent on April 1, 2020. This gain was partially offset by the liability loss from the above-mentioned software change. The plan assets earned 2.0% in 2020 on an actuarial value basis and 0.3% on a market value basis, compared to the assumed rate of return of 2.12%.

Plan benefits were reduced to the level of the PBGC guarantee upon the plan's insolvency. This change reduced the plan's unfunded accrued liability by \$791,269.

In order to better reflect actual experience of this plan and reasonable future expectations, we have made the following changes to the actuarial assumptions:

- The assumed interest rate was reduced from 2.12% for 20 years and 2.26% thereafter to 1.69% for 20 years and 1.66% thereafter, which mirrors the PBGC interest assumption for terminated plans in effect as of the valuation date.
- The assumed annual administrative expenses were increased from \$125,000 to \$150,000.

These changes increased the plan's unfunded accrued liability by \$1,208,662 and the normal cost by \$25,000.

The minimum required contribution has increased from \$10,856,200 in 2020 to \$12,765,376 in 2021 due to the plan's accumulated funding deficiency. The funding deficiency has increased from \$8,851,421 as of December 31, 2019 to \$10,815,012 as of December 31, 2020.

The expected employer contributions of \$34,230 for the 2021 plan year are insufficient to meet the minimum funding requirements.

The Rehabilitation Plan ended upon the plan becoming insolvent on April 1, 2020. Also, due to the plan's insolvency, annual zone status certifications are not required after 2020.

ACTUARIAL CERTIFICATION

The information and results contained in this actuarial valuation report as of January 1, 2021 were prepared for the use of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and its auditors. The actuarial computations made are for purposes of determining the plan's funding requirements and accounting disclosures under FASB Accounting Standards Codification 960 (ASC 960). The report has been prepared for the purposes outlined herein and should not be relied upon for any other purpose. Determinations for purposes other than meeting the plan's funding and financial accounting requirements may be significantly different than the results presented in this report. To avoid misrepresentation, the report is intended to be used in its entirety.

Our calculations were based upon the participant data as of December 31, 2020, as provided by the plan's administrator, and the financial data as of December 31, 2020 received from the plan's auditor. While the scope of our engagement did not call for us to perform an audit or independent verification of this information, we have reviewed this information for reasonableness. The accuracy of the results is dependent upon the accuracy and completeness of the underlying information, which is the responsibility of those who supply the data.

The actuarial cost method and assumptions, other than those prescribed by law or regulations, are selected by the actuary. In our opinion, the actuarial methods used are appropriate for the purposes of the valuation, and each economic assumption (other than those prescribed by law or regulation) was selected from a range which represents our best estimate of anticipated experience under the plan.

Furthermore, the demographic assumptions used, in the aggregate, are reasonable (taking into account the experience of the plan and reasonable expectations). In our opinion, the actuarial methods used are appropriate for purposes of the valuation and the actuarial assumptions used represent our best estimate of anticipated experience of this group.

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
September 28, 2022
Page Three

Future actuarial measurements may differ significantly from current measurements presented in this report due to such factors as the following: plan experience different from that anticipated by the economic or demographic assumptions, changes in economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for these measurements (such as the end of an amortization period or additional cost or contribution requirements based on the plan's funded status) and changes in plan provisions, accounting standards or applicable law. Due to the limited scope of the actuary's assignment, the actuary did not perform an analysis of the potential range of such future measurements.

We certify this report has been prepared in accordance with generally accepted actuarial principles and practices and, to the best of our knowledge, fairly presents the actuarial position of the plan as of January 1, 2021. The actuary and the firm responsible for this report have no conflicts of interest that may impair the objectivity of our work. We further certify that we meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.

Sincerely,



Ronald C. Stokes, FSA, MAAA
Enrolled Actuary No. 20-05287

RCS/vmd

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**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

EXECUTIVE SUMMARY

A summary of the principal results of the current and preceding actuarial valuations follows:

	<u>January 1, 2021</u>	<u>January 1, 2020</u>
(A) Number of participants		
• Active	21	31
• Vested terminated	233	247
• Retired and disabled	<u>450</u>	<u>455</u>
• Total	704	733
(B) Normal cost	\$ 175,447	\$ 155,006
(C) Unfunded accrued liability at the beginning of the plan year	\$21,131,901	\$21,058,487
(D) Contribution levels		
• Contribution rate per shift	\$ 6.55	\$ 6.55
• Expected Employer contribution	\$ 34,230	\$ 50,016
• Actual Employer contribution	To be determined	\$ 40,756
• PBGC financial assistance	To be determined	\$ 1,416,200
• Minimum required (end of plan year)	\$12,765,376	\$10,856,200
• Maximum deductible	\$30,305,975	\$29,029,339
• Amortization period	Infinite	Infinite
(E) Plan assets at the beginning of the plan year		
• Market value	\$ 436,712	\$ 436,930
• Actuarial value	\$ 434,755	\$ 427,480
(F) Value of accumulated plan benefits at the beginning of the plan year		
• Vested	\$21,504,536	\$21,337,651
• Nonvested	<u>3,844</u>	<u>13,867</u>
• Total	\$21,508,380	\$21,351,518
(G) Unfunded vested benefits	\$21,067,824	\$20,900,721
(H) Plan assets as a percentage of accumulated benefits		
• Market value	2.0%	2.0%
• Actuarial value	2.0%	2.0%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

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**BINDERY INDUSTRY EMPLOYERS
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I. PLAN ASSETS

(per Audit)

(A) Statement of plan assets as of December 31, 2020 at market value

Cash and equivalents	\$ 468,966
Mutual funds - Fixed income	36
Employers' contributions receivable	3,137
Accrued income	4
Prepaid expenses	<u>792</u>
Total assets	\$ 472,935
Administrative expenses payable	<u>(36,223)</u>
Net assets available for benefits	\$ 436,712

(B) Statement of changes in plan assets (market value)

Receipts	
Employers' contributions	\$ 40,756
PBGC funding	1,416,200
Interest and dividends	944
Net realized and unrealized gains/(losses)	<u>301</u>
Total receipts	\$ 1,458,201
Disbursements	
Benefit payments	\$ 1,290,005
Administrative expenses	168,414
Investment expenses	<u>0</u>
Total disbursements	\$ 1,458,419
Net receipts	\$ (218)
Plan assets	
January 1, 2020	\$ 436,930
December 31, 2020	\$ 436,712

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Determination of actuarial value of assets as of January 1, 2021

(1)	Actuarial value of Fund assets at January 1, 2020	\$ 427,480
(2)	(1) x 1.0212	\$ 436,543
(3)	Contributions to the Fund during year (including PBGC funding)	\$ 1,456,956
(4)	Interest on (3) from date of payment to December 31, 2020 at 2.12% per annum*	\$ 15,444
(5)	Disbursements (excluding investment expenses)	\$ 1,458,419
(6)	Interest on (5) to December 31, 2020 at 2.12% per annum**	\$ 16,748
(7)	Expected actuarial value at December 31, 2020 = (2) + (3) + (4) - (5) - (6)	\$ 433,776
(8)	Market value of Fund assets at December 31, 2020	\$ 436,712
(9)	Difference between market value and expected actuarial value = (8) - (7)	\$ 2,936
(10)	Preliminary actuarial value of assets = (7) + 1/3 of (9)	\$ 434,755
(11)	(8) x 1.20	\$ 524,054
(12)	(8) x 0.80	\$ 349,370
(13)	Actuarial value of Fund assets at January 1, 2021 = (10), but not more than (11) or less than (12)	\$ 434,755

(D) Valuation assets

For purposes of this valuation, the actuarial value of plan assets in (C)(13) of \$434,755 is used.

(E) Asset returns

Rate of return on market value of plan assets (net of investment expenses)	0.3%
Rate of return on actuarial value of plan assets (net of investment expenses)	2.0%

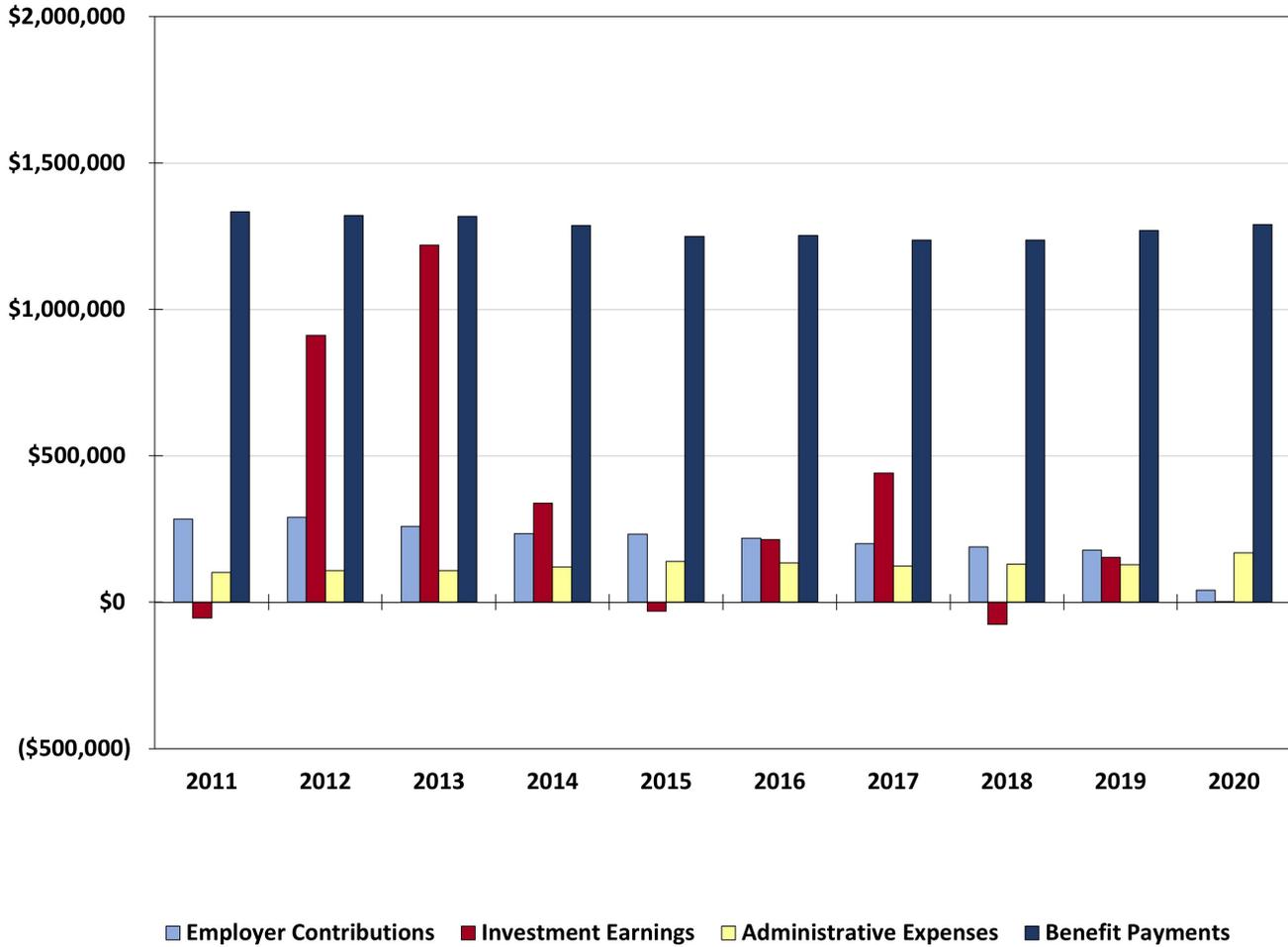
*Assumes that contributions occur on July 1, on average.

**Assumes disbursements are paid on the first day of the month.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART I

**HISTORY OF RECEIPTS AND DISBURSEMENTS
FOR PLAN YEARS ENDING DECEMBER 31**



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

II. UNFUNDED ACCRUED LIABILITY

(A)	Unfunded accrued liability as of January 1, 2020	\$ 21,058,487
(B)	Normal cost for the plan year (with expenses)	\$ 155,006
(C)	Interest on (A) and (B) for one year	\$ 449,726
(D)	Employer contributions on account of the plan year	\$ 40,756
(E)	Interest on (D) from the dates paid to the end of the plan year*	\$ 432
(F)	Expected unfunded accrued liability as of January 1, 2021 = (A) + (B) + (C) - (D) - (E)	\$ 21,622,031
(G)	Actual unfunded accrued liability as of January 1, 2021, before changes	\$ 20,714,508
(H)	Actuarial gain (loss) = (F) - (G)	\$ 907,523
(I)	Change in unfunded accrued liability due to plan amendment**	\$ (791,269)
(J)	Change in unfunded accrued liability due to assumption changes	\$ 1,208,662
(K)	Unfunded accrued liability as of January 1, 2021, after changes = (G) + (I) + (J)	\$ 21,131,901

* Contributions are assumed paid on July 1, 2020, on average.

** For valuation purposes, benefits were reduced to the PBGC maximum guaranteed benefit level effective April 1, 2020, the date of the plan's insolvency.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**III. FUNDING STANDARD ACCOUNT
(Plan year ending December 31, 2020)**

(A)	Charges to Funding Standard Account	
(1)	Prior year funding deficiency	\$ 8,851,421
(2)	Normal cost for the plan year (with expenses)	155,006
(3)	Amortization charges (on \$13,895,441)	1,803,792
(4)	Interest on (1), (2) and (3)	<u>229,177</u>
(5)	Total charges	\$ 11,039,396
(B)	Credits to Funding Standard Account	
(1)	Prior year credit balance	\$ 0
(2)	Contributions for the plan year	40,756
(3)	Amortization credits (on \$1,688,375)	179,393
(4)	Interest on (1), (2) and (3)	<u>4,235</u>
(5)	Total credits	\$ 224,384
(C)	Credit balance (funding deficiency) as of December 31, 2020 = (B)(5) - (A)(5)	\$(10,815,012)

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IV. SUMMARY OF VALUATION RESULTS

All values shown are as of January 1, 2021

(A)	Normal cost (with expenses)	\$ 175,447
(B)	Accrued liability	
(1)	Present value of all benefits payable in future years:	
(a)	Active participants (21)	\$ 959,720
(b)	Vested terminated participants (233)	6,522,305
(c)	Retired participants (450)	<u>14,280,688</u>
(d)	Total (704)	\$ 21,762,713
(2)	Present value of future normal costs	\$ 196,057
(3)	Accrued liability = (1)(d) - (2)	\$ 21,566,656
(C)	Valuation assets	\$ 434,755
(D)	Unfunded accrued liability = (B)(3) - (C), but not less than zero	\$ 21,131,901

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

V. DEVELOPMENT OF CONTRIBUTION LEVELS

(A)	The minimum required contribution to avoid a funding deficiency in the funding standard account for the 2021 plan year is determined as follows:	
(1)	Charges to Funding Standard Account	
	(a)	Prior year funding deficiency \$10,815,012
	(b)	Normal cost for the plan year 175,447
	(c)	Amortization charges (on \$13,556,654) 1,866,101
	(d)	Interest on (a), (b) and (c) <u>217,276</u>
	(e)	Total charges \$13,073,836
(2)	Credits to Funding Standard Account	
	(a)	Prior year credit balance \$ 0
	(b)	Amortization credits (on \$3,239,765) 303,334
	(c)	Interest on (a) and (b) <u>5,126</u>
	(d)	Total credits \$ 308,460
(3)	Minimum required contribution to be made at the end of the plan year equals excess, if any, of (1)(e) over (2)(d) \$12,765,376	

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(B)	The maximum deductible contribution for the plan year ending December 31, 2021 is determined as follows:	
(1)	Normal cost for the plan year	\$ 175,447
(2)	10 year amortization of unfunded actuarial accrued liability	2,276,081
(3)	Interest on (1) and (2)	<u>41,431</u>
(4)	Total	\$ 2,492,959
(5)	Minimum required contribution = (A)(3)	\$ 12,765,376
(6)	Full funding limitation = (C)(3)	\$ 21,667,442
(7)	Tax deductible limit equals (4), but not less than (5), nor more than (6); or (C)(2)(e), if greater	\$ 30,305,975
(C)	Development of full funding limitation for maximum deductible purposes	
(1)	Based on accrued liability	
(a)	Accrued liability (including normal cost)	\$ 21,742,103
(b)	Applicable assets (lesser of actuarial or market value)	\$ 434,755
(c)	Full funding limitation at end of year = [(a) - (b)] x 1.0169, but not less than zero	\$ 21,667,442
(2)	Based on 90% of RPA 94 current liability*	
(a)	Current liability projected to end of year	\$ 21,647,125
(b)	90% of (a)	\$ 19,482,413
(c)	Applicable assets projected to end of year	\$ 0
(d)	Full funding limitation = (b) - (c), but not less than zero	\$ 19,482,413
(e)	Unfunded current liability = [1.4 x (a)] - (c), but not less than zero	\$ 30,305,975
(3)	Full funding limit = greater of (1)(c) or (2)(d)	\$ 21,667,442

* Based on 2.08% interest, the RP-2014 Mortality Table with projected improvements for all healthy participants, and other assumptions as described in Appendix A.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(D) Schedule of amortization bases

Why Established	Date Established	Initial Amount	Outstanding Balance	Years Remaining	Charge (Credit)
Initial base	1/1/1977	\$ N/A	\$ 232,267	1	\$ 232,267
Plan amendment	1/1/1988	N/A	289,714	2	146,071
Plan amendment	1/1/1989	N/A	75,471	3	25,580
Plan amendment	1/1/1991	N/A	105,104	5	21,731
Plan amendment	1/1/1992	N/A	310,542	6	53,949
Assumption change	1/1/1994	N/A	39,321	3	13,327
Plan amendment	1/1/1998	N/A	60,929	12	5,558
Plan amendment	1/1/2001	N/A	608,419	15	45,491
Actuarial loss	1/1/2002	N/A	24,519	1	24,519
Plan amendment	1/1/2002	N/A	258,493	16	18,265
Actuarial loss	1/1/2003	N/A	123,983	2	62,511
Actuarial loss	1/1/2004	N/A	33,600	3	11,388
Actuarial loss	1/1/2005	233,248	70,567	4	18,088
Actuarial loss	1/1/2006	336,011	125,455	5	25,939
Actuarial gain	1/1/2007	(91,813)	(9,393)	1	(9,393)
Actuarial gain	1/1/2008	(98,446)	(19,452)	2	(9,807)
Actuarial loss	1/1/2009	2,784,110	797,256	3	270,218
Actuarial loss	1/1/2010	75,068	27,700	4	7,100
Actuarial loss	1/1/2011	141,739	63,211	5	13,069
Plan amendment	1/1/2011	(202,795)	(90,444)	5	(18,700)
Actuarial loss	1/1/2012	232,919	120,568	6	20,946
Assumption change	1/1/2012	310,195	160,575	6	27,896
Actuarial loss	1/1/2013	102,851	60,108	7	9,025
Assumption change	1/1/2013	(70,724)	(41,331)	7	(6,205)
Actuarial gain	1/1/2014	(397,300)	(256,893)	8	(34,026)
Actuarial gain	1/1/2015	(151,251)	(106,559)	9	(12,649)
Assumption change	1/1/2015	694,920	489,588	9	58,116
Actuarial gain	1/1/2016	(142,718)	(108,250)	10	(11,659)
Actuarial loss	1/1/2017	87,021	70,378	11	6,947
Actuarial gain	1/1/2018	(80,329)	(68,727)	12	(6,270)
Assumption change	1/1/2018	604,140	516,889	12	47,154
Actuarial gain	1/1/2019	(176,342)	(158,809)	13	(13,482)
Actuarial gain	1/1/2020	(722,535)	(681,115)	14	(54,127)
Assumption change	1/1/2020	8,150,575	7,683,335	14	610,576
Actuarial gain	1/1/2021	(907,523)	(907,523)	15	(67,854)
Plan amendment	1/1/2021	(791,269)	(791,269)	15	(59,162)
Assumption change	1/1/2021	1,208,662	<u>1,208,662</u>	15	<u>90,370</u>
Total			\$ 10,316,889		\$ 1,562,767

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(D) Schedule of amortization bases *(cont'd)*

Notes:

- (1) Outstanding balances are shown as of January 1, 2021, before any payments on account of the plan year.
- (2) Net outstanding balance of \$10,316,889 less credit balance/(funding deficiency) of \$(10,815,012) equals the unfunded accrued liability of \$21,131,901.
- (3) The years remaining for certain charge bases established on or before January 1, 2008 (including the initial base, actuarial losses and plan amendments) reflect the 5-year automatic extension effective January 1, 2008 approved by the IRS on March 18, 2009.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VI. ACTUARIAL PRESENT VALUE OF ACCUMULATED PLAN BENEFITS

(A)	Actuarial Present Value of Accumulated Plan Benefits as of January 1, 2021	
(1)	Vested benefits	
	(a) In-payment participants (450)	\$ 14,280,687
	(b) Terminated vested participants (233)	6,522,305
	(c) Active participants (17)	<u>701,544</u>
	(d) Total (700)	\$ 21,504,536
(2)	Nonvested benefits (4)	<u>3,844</u>
(3)	Total accumulated plan benefits (704)	\$ 21,508,380
(4)	Plan assets (market value)	\$ 436,712
(5)	Unfunded vested benefits = (1)(d) - (4)	\$ 21,067,824
(6)	Plan assets as a percentage of the value of vested benefits = (4) ÷ (1)(d)	2.0%
(B)	Change in actuarial present value of accumulated plan benefits	
(1)	Actuarial present value of accumulated plan benefits as of January 1, 2020	\$ 21,351,518
(2)	Increase (decrease) during the year attributable to:	
	(a) Plan amendment*	\$ (785,948)
	(b) Change in actuarial assumptions	1,208,579
	(c) Benefits accumulated and actuarial (gains)/losses	585,258
	(d) Interest accrued due to decrease in the discount period	438,978
	(e) Benefits paid	<u>(1,290,005)</u>
	(f) Net increase (decrease)	\$ 156,862
(3)	Actuarial present value of accumulated plan benefits as of January 1, 2021	\$ 21,508,380
(C)	Present value of administrative expenses	\$ 363,884

* For valuation purposes, benefits were reduced to the PBGC maximum guaranteed benefit level effective April 1, 2020, the date of the plan's insolvency.

Notes:

- (1) The present values shown above were calculated in accordance with Interpretations 1 and 2 of the American Academy of Actuaries. The assumed investment rate of return is based on an interest assumption of 1.69% for 20 years and 1.66% thereafter.
- (2) The present value of administrative expenses was calculated using ERISA 4044 methodology, but with an interest rate no less than 1.0%.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART II

COMPARISON OF LIABILITIES TO ASSETS FOR PLAN YEARS BEGINNING JANUARY 1

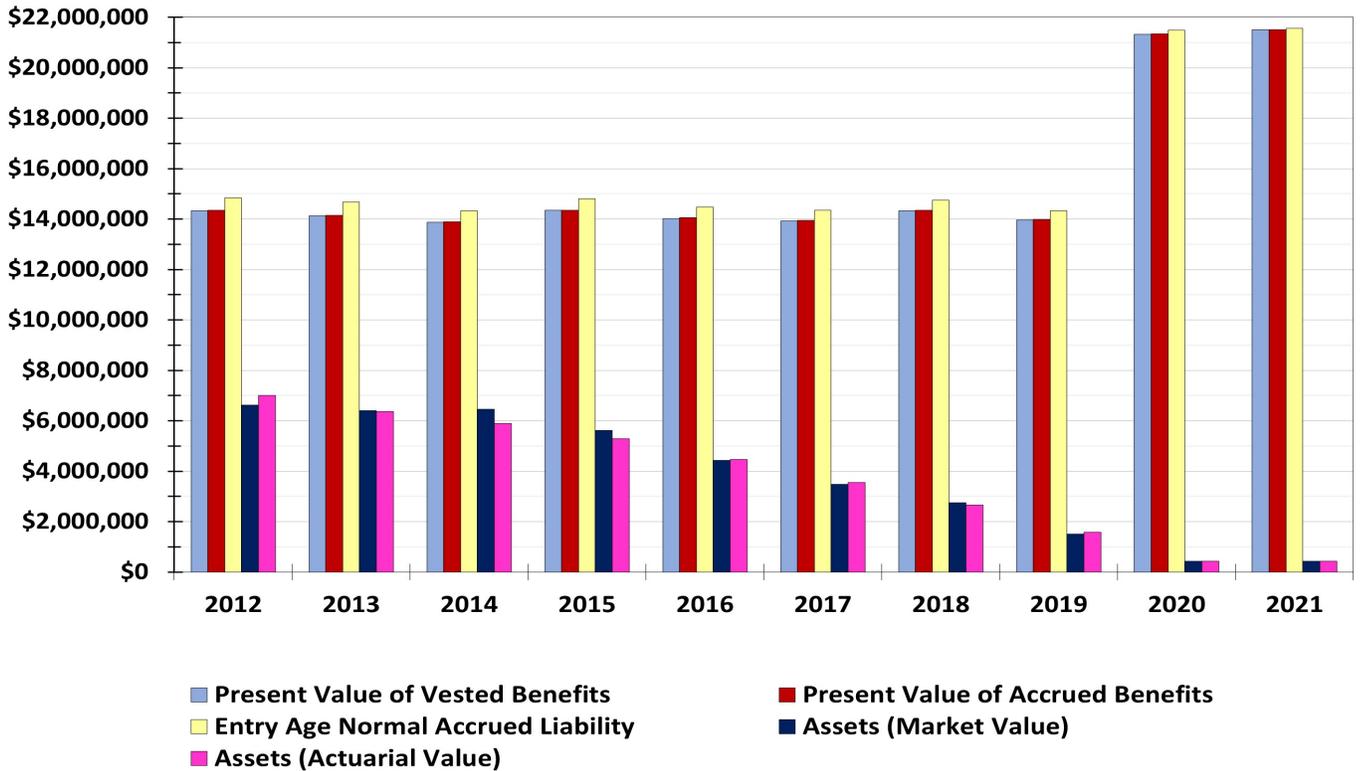
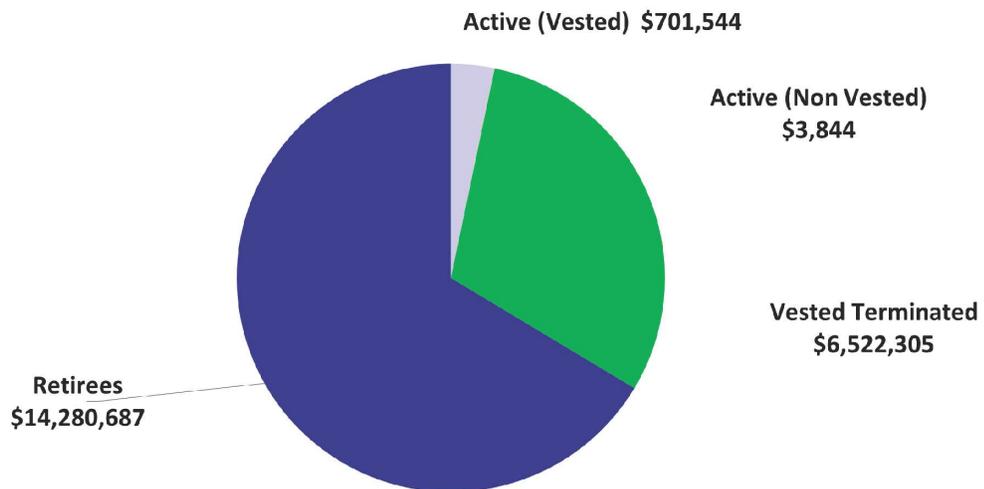


CHART III

BREAKDOWN OF PRESENT VALUE OF ACCUMULATED BENEFITS BY CATEGORY



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Unfunded vested benefits (Presumptive method)

<u>Date</u>	<u>Vested Benefits Interest Rate</u>	<u>Value of Vested Benefits</u>	<u>Asset Value⁽¹⁾</u>	<u>Unfunded Vested Benefits⁽²⁾</u>
12/31/2000	8.0%	\$ 13,161,490	\$ 13,765,888	\$ (604,398)
12/31/2001	8.0%	13,729,764	12,855,490	874,274
12/31/2002	8.0%	13,966,603	11,234,306	2,732,297
12/31/2003	7.5%	14,352,701	12,245,649	2,107,052
12/31/2004	7.5%	14,617,090	12,500,580	2,116,510
12/31/2005	7.5%	14,525,963	12,170,594	2,355,369
12/31/2006	7.5%	14,482,705	12,569,788	1,912,917
12/31/2007	7.5%	14,391,719	12,337,060	2,054,659
12/31/2008	7.5%	14,644,094	7,591,676	7,052,418
12/31/2009	7.5%	14,419,795	8,014,810	6,404,985
12/31/2010	7.5%	14,402,684 ⁽³⁾	7,831,775	6,570,909
12/31/2011	7.5%	14,511,116 ⁽³⁾	6,626,197	7,884,919
12/31/2012	7.5%	14,306,141 ⁽³⁾	6,398,374	7,907,767
12/31/2013	7.5%	14,033,278 ⁽³⁾	6,451,692	7,581,586
12/31/2014 ⁽⁴⁾	7.5%	13,811,434 ⁽³⁾	5,618,297	8,193,137
12/31/2015	7.5%	14,171,573 ⁽³⁾	4,430,843	9,740,730
12/31/2016	7.5%	14,059,344 ⁽³⁾	3,475,390	10,583,954
12/31/2017	7.5%	13,881,391 ⁽³⁾	2,756,882	11,124,509
12/31/2018	7.0%	14,078,232 ⁽³⁾	1,503,084	12,575,148
12/31/2019	7.0%	13,337,287 ⁽³⁾	436,930	12,900,357
12/31/2020	2.12%/2.26%	20,341,155 ⁽³⁾	436,712	19,904,443

Employer Withdrawal Liability is expected for any employer who withdraws from the plan prior to January 1, 2022.

Notes:

(1) Asset values are market values.

(2) The amount of Unfunded Vested Benefits is obtained by subtracting the market value of the plan assets from the value of vested benefits determined using ongoing plan assumptions as outlined in Appendix A.

(3) Includes the additional value of vested adjustable benefits as of January 1, 2011 of \$182,312. For withdrawal liability purposes, the unamortized amount is added over the next 15 years.

(4) Effective December 31, 2014, excludes effect of any assumption changes effective on the first day of the next plan year.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VII. PROJECTED PENSION PAYMENTS

<u>Year</u>	<u>Number of Recipients</u>	<u>Amount</u>
2021	452	\$ 1,278,000
2022	432	1,248,000
2023	412	1,217,000
2024	391	1,188,000
2025	371	1,159,000
2026	351	1,123,000
2027	331	1,099,000
2028	310	1,085,000
2029	290	1,058,000
2030	270	1,036,000

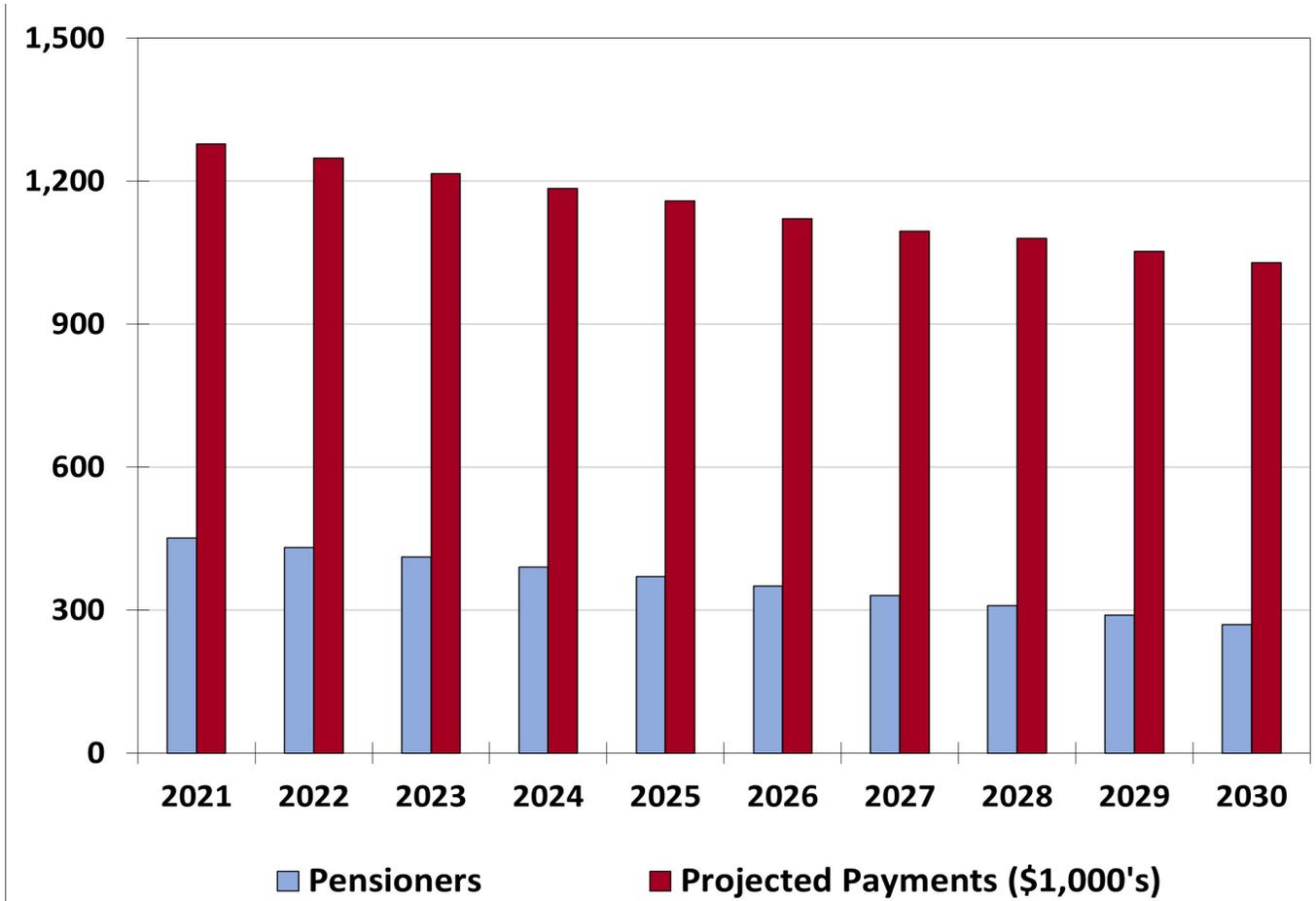
Notes:

- (1) Survivorship is based on the valuation assumptions.
- (2) For actives and those who have terminated with a vested deferred pension, this projection reflects only normal retirement pension benefits commencing at the normal retirement age. All current pension recipients are included.
- (3) No payments resulting from future terminations, disablements or deaths are reflected.
- (4) It is assumed that no future new entrants will be eligible for pension benefits during the next ten years.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART IV

PROJECTED PENSIONERS AND ANNUAL PENSION PAYMENTS



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VIII. PARTICIPANT DATA

**TABLE 1. DISTRIBUTION OF ACTIVE PARTICIPANTS
BY AGE AND SERVICE GROUPS**

As of January 1, 2021

Age Last Birthday	Completed Years of Credited Service									
	1-4	5-9	10-14	15-19	20-24	25-29	30-34	35-39	40+	Total
Under 25	1									1
25 - 29										0
30 - 34										0
35 - 39	1	1								2
40 - 44					1					1
45 - 49		2		1						3
50 - 54	1		1	1						3
55 - 59	1		1			2		2		6
60 - 64	1						1	1	1	4
65 - 69			1							1
70 & over										0
Total	5	3	3	2	1	2	1	3	1	21

Note: No active participant has less than one year of benefit service.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**TABLE 2. DISTRIBUTION OF INACTIVE PARTICIPANTS
BY AGE GROUP**

Terminated Vested Participants and Beneficiaries with Rights to Future Benefits

<u>Age Last Birthday</u>	<u>Number of Participants</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 30	1	\$ 55.65	\$ 55.65
30 - 34	3	363.06	121.02
35 - 39	11	1,172.66	106.61
40 - 44	22	3,799.92	172.72
45 - 49	21	3,813.41	181.59
50 - 54	52	9,412.44	181.01
55 - 59	66	11,773.90	178.39
60 - 64	40	9,424.43	235.61
65 & over	<u>17</u>	<u>2,939.53</u>	<u>172.91</u>
Total	233	\$42,755.00	\$183.50

Normal, Early & Disability Retirements and Beneficiaries

<u>Age Last Birthday</u>	<u>Number of Participants*</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 55	3	\$ 580.75	\$193.58
55 - 59	20	2,858.85	142.94
60 - 64	44	9,631.06	218.89
65 - 69	81	21,291.76	262.86
70 - 74	72	19,342.90	268.65
75 - 79	86	19,891.30	231.29
80 - 84	76	18,980.44	249.74
85 - 89	39	7,595.18	194.75
90 & over	<u>31</u>	<u>4,666.75</u>	<u>150.54</u>
Total	452	\$104,838.99	\$231.94

*Includes two alternate payees under a qualified domestic relations order (QDRO).

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IX. SUMMARY OF PARTICIPANT DATA

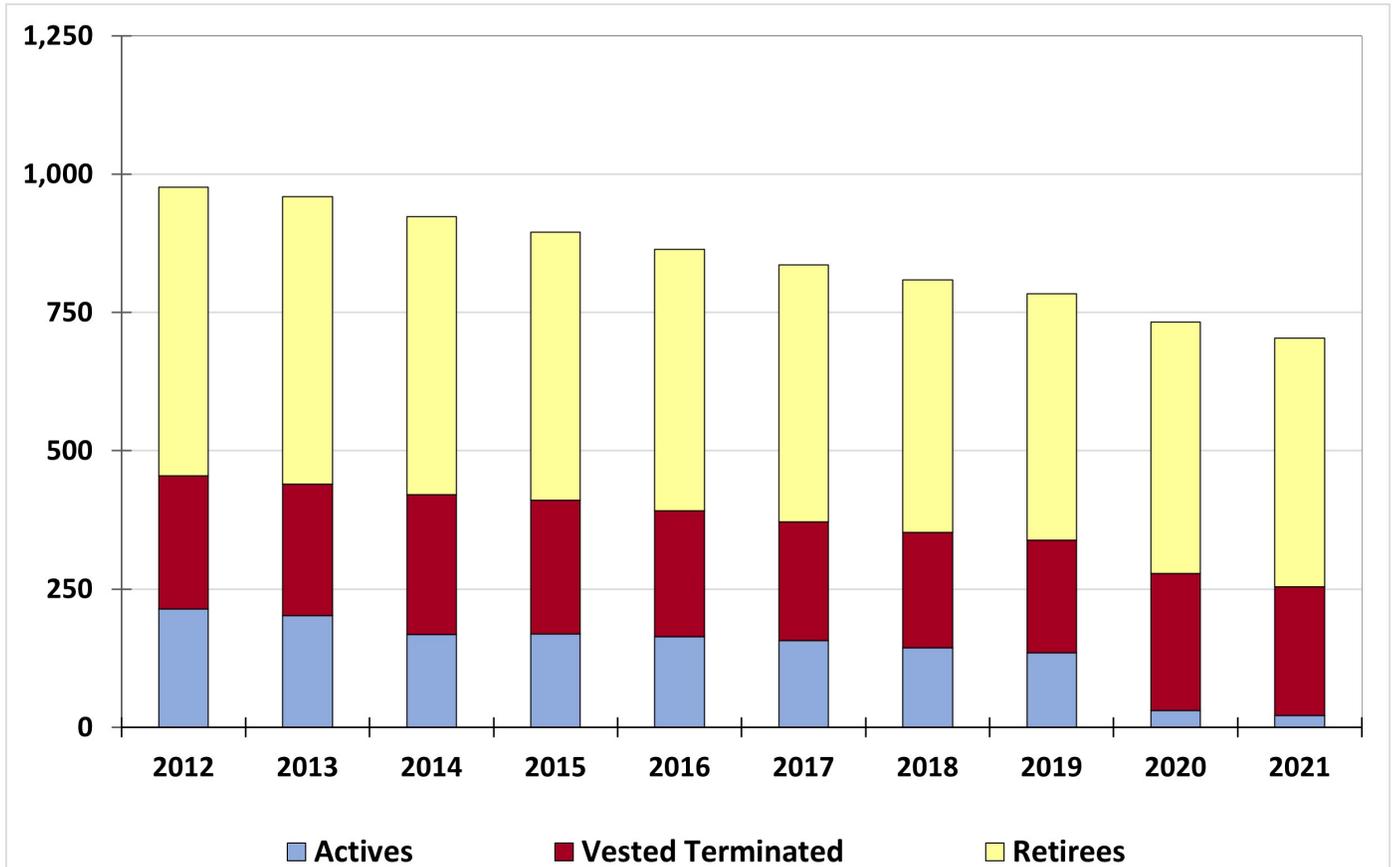
	<u>January 1, 2021</u>	<u>January 1, 2020</u>
(A) Active Participants		
(1) Number	21	31
(2) Average benefit service to date	18.2	19.6
(3) Average attained age	52.7	52.8
(4) Accrued annual pension		
(a) Total	\$ 56,701	\$ 94,794
(b) Average	\$ 2,700	\$ 3,058
(5) Projected annual pension		
(a) Total	\$ 93,153	\$ 150,833
(b) Average	\$ 4,436	\$ 4,866
(B) Vested terminated participants		
(1) Number	233	247
(2) Accrued annual pension		
(a) Total	\$ 507,453	\$ 589,389
(b) Average	\$ 2,178	\$ 2,386
(C) Disabled pensioners		
(1) Number	28	29
(2) Annual pension		
(a) Total	\$ 86,695	\$ 93,742
(b) Average	\$ 3,096	\$ 3,232
(D) Other pensioners and beneficiaries		
(1) Number	424*	428*
(2) Annual pension		
(a) Total	\$1,171,373	\$1,193,037
(b) Average	\$ 2,763	\$ 2,787

* Two participants are both a pensioner and a beneficiary. Pensioners include two alternate payees under a qualified domestic relations order (QDRO).

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART V

PARTICIPANT CENSUS COMPARISON



	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>
Actives	214	202	168	169	164	157	144	135	31	21
Vested Terminated	241	238	253	242	228	215	208	203	247	233
Retirees	521	519	502	484	472	464	457	446	455	450

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

X. RECONCILIATION OF CENSUS DATA

	<u>Actives</u>	<u>Terminated Vesteds</u>	<u>Retirees, Disabled Retirees and Beneficiaries*</u>	<u>Total</u>
Participants as of 1/1/2020	31	247	457	735
New participants	2	0	0	2
Reemployed participants	0	0	0	0
Nonvested terminations	0	(1)	0	(1)
Vested terminations	(9)	9	0	0
Retirements	(3)	(22)	25	0
Deaths with beneficiary	0	0	(3)	(3)
Deaths without beneficiary	0	(1)	(30)	(31)
Deaths with lump sum paid	0	0	0	0
New beneficiaries	0	0	3	3
Other	0	1	0	1
Benefits expired	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Participants as of 1/1/2021	21	233	452	706

*Retirees include two alternate payees under a qualified domestic relations order (QDRO) as of January 1, 2020 and January 1, 2021.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

ACTUARIAL METHODS AND ASSUMPTIONS

(A) Actuarial cost method

Entry age normal.

(B) Asset valuation method

Plan assets are valued using an actuarial smoothing method. Beginning with the January 1, 1995 plan year, the actuarial value of assets as of each valuation date is equal to the prior plan year's actuarial value adjusted to reflect contributions and disbursements, and then increased to reflect interest at the assumed investment rate. This value is then adjusted, up or down, by one-third of the difference between such value and the actual market value. In no event will the actuarial value of assets be less than 80% or more than 120% of the actual market value.

(C) Persons included

Based on data provided to us, all persons entitled to coverage under the plan as of the valuation date are included in the calculations.

(D) Significant actuarial assumptions

(1) Investment return

1.69% for 20 years and 1.66% thereafter, net of investment expenses.

(2) Retirement rates

<u>Age</u>	<u>Rate</u>
55 - 61	2%
62	15%
63	10%
64	10%
65	40%
66 - 69	33%
70	100%

Terminated vested participants are assumed to retire at age 65 or the valuation date, if later. Spouses of deceased terminated vested participants are assumed to retire when the participant would have attained age 65.

**BINDERY INDUSTRY EMPLOYERS
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(3) Mortality

The following headcount-weighted RPH-2014 Mortality Tables (Male/Female) are used:

(a) Pre-retirement - RPH-2014 Blue Collar Employee Mortality Table with a one-year setback to reflect expected mortality improvement.

(b) Post-retirement

Not disabled: RPH-2014 Blue Collar Healthy Annuitant Mortality Table with a one-year setforward (reduced from a prior two-year setforward) to reflect expected mortality improvement.

Disabled lives: 150% of the RPH-2014 Disabled Retiree Mortality Table.

(4) Withdrawal from service

(a) Select rates are used in the first 5 years of service.

<u>Years of Service</u>	<u>Rate</u>
0	30%
1	20%
2	15%
3	15%
4	13%

(b) After 5 years of service, turnover rates vary by attained age.

<u>Age</u>	<u>Rate</u>
25	8%
30	7%
35	7%
40	6%
45	6%
50	6%
55	3%
60	3%

**BINDERY INDUSTRY EMPLOYERS
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(5) Disability

100% of the rates developed in a 1955 study of experience among several large industrial employee groups.

(6) Hours of work

It was assumed that each participant will work the same number of shifts in each future year that he worked in the most recent plan year.

(7) Allowance for other expenses

Administrative expenses payable from the trust are assumed to be covered by a \$150,000 addition to the normal cost.

(8) Expected employer contributions

Employees are assumed to work the same number of shifts in future years that they worked in the most recent plan year. At an annual rate of 5,226 shifts (the 2020 total for actives) and the contribution rate of \$6.55 per shift for the remaining employer), expected contributions are \$34,230 for 2021.

(9) Marriage

It was assumed that 80% of active and terminated vested participants are married with females assumed to be three years younger than males.

(10) Terminated vested participants

Terminated vested participants over age 70 are assigned a 50% probability of collecting their benefits.

(E) Data qualifications

If the date of birth was missing, the participant was assumed to be hired at age 30.

(F) Change in actuarial methods and assumptions

The actuarial methods and assumptions are the same as those used in the prior valuation except as follows:

- The assumed interest rate was reduced from 2.12% for 20 years and 2.26% thereafter to 1.69% for 20 years and 1.66% thereafter, which reflects the PBGC interest assumption for terminated plans in effect as of the current valuation date.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

- The assumed annual administrative expenses were increased from \$125,000 to \$150,000.

(G) Justification for changes in actuarial methods and/or assumptions

- The plan has not terminated nor has a mass withdrawal been declared by the Board of Trustees. However, the plan became insolvent as of April 1, 2020 and is now receiving financial assistance from the PBGC. The PBGC quarterly payments to the plan are just sufficient to cover benefit payments and expenses. Consequently, with the low value of assets, the investment return is minimal. The investment return in 2020, the first year of insolvency, was 0.3%.
- Since this plan is age-heavy with only one small contributing employer remaining, the liquidity of assets needed to pay the pension benefits provides no opportunity for long-term investment.
- Plan termination interest rate assumptions, which reflect rates at which annuities could be currently purchased, are now the best measure of the plan's liabilities in the absence of investable assets.
- The assumed annual administrative expenses were increased due to recent actual experience (\$168,000 in 2020) and expectations for 2021.

(H) Basis for selection of demographic assumptions

Demographic assumptions are based on national tables, as periodically updated, which are determined by the actuary to be appropriate for this plan. In the case of assumptions for which the experience of the plan is credible, plan experience is used. For example, administrative expenses are determined from recent experience, per the plan audit. The retirement assumption is determined from plan experience. These assumptions are periodically adjusted in light of developing experience.

(I) Basis for selection of economic assumptions

Interest assumptions are based on PBGC interest rates in the absence of investable assets. Hours worked in the coming year are assumed to be the same as the previous year. These assumptions are periodically adjusted in light of developing experience.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

PLAN SUMMARY

(As of January 1, 2021, after insolvency)

(A) Effective date and plan year

The effective date of the plan is January 1, 1962. As part of the Rehabilitation Plan, adjustable benefits were reduced effective January 1, 2011, including the change to the normal form of benefits from a five year certain and life annuity to a life annuity and the elimination of the disability benefit. Effective April 1, 2020, the plan became insolvent and pension benefit amounts, as needed, were reduced to the PBGC guaranteed benefit level.

The plan year is the calendar year.

(B) Eligibility for coverage

An employee who is a member of an Eligible Employee Classification becomes a participant in the plan on the first day of the month coincident with or next following the completion of one year of service. Journeymen Bookbinders become participants on the date of covered employment.

(C) Employee contributions

None.

(D) Normal retirement date

The normal retirement date is the first day of the month coincident with or next following the later of the attainment of age 65 or the 5th anniversary of plan participation. A participant cannot retire prior to participating in the plan for at least 5 years.

(E) Employment after normal retirement date

If employment continues beyond the normal retirement date, pension payments will not commence until actual retirement. However, pension payments will commence no later than April 1 of the calendar year following the year in which the participant attains age 70-1/2, if employment continues beyond such date. Additional pension credits continue to accrue until the actual retirement date.

**BINDERY INDUSTRY EMPLOYERS
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(F) Break in service

A temporary break in service occurs if less than 60 shifts are worked in two consecutive plan years and less than 52 shifts in at least one of them. No break shall occur, however, during periods of authorized leaves of absence, military service, sickness, accident or job-protected leave under the Family Medical Leave Act of 1993. A temporary break in service becomes a permanent break in service when the period of temporary break equals or exceeds the greater of five years or credited service accumulated prior to the temporary break. A permanent break results in forfeiture of all credited service unless the participant has at least 5 years of vesting service.

(G) Credited service

Benefit accrual - one full year is credited for each plan year in which the participant is credited with at least 220 shifts. Fractional years are credited in years in which a participant works fewer than 220 shifts. Credited service is reduced by 1/10 for each 22 shifts less than 220 that the participant works in each plan year. No service credit is counted until a participant has completed two years of continuous service. Once two years of continuous service have been earned, service is retroactively credited.

Vesting - one year of Vesting Service is credited for each plan year in which at least 103 shifts (equivalent of 750 hours) are credited. No partial years are credited for vesting purposes.

(H) Normal retirement pension

- (1) Eligibility requirements - must be a participant at Normal Retirement Date and retire on or after that date.
- (2) Monthly pension - \$14.00 per month per year of Credited Service with no maximum on service. For valuation purposes, this benefit rate was reduced to the PBGC maximum guaranteed benefit level of \$13.25 per month effective April 1, 2020, the date the plan became insolvent.

(I) Early retirement pension

- (1) Eligibility requirements - must have reached age 55 with at least 5 years of Vesting Service.
- (2) Monthly pension - The normal retirement pension accrued to the early retirement date reduced by ½% for each month that the early retirement date precedes the Normal Retirement Date.

**BINDERY INDUSTRY EMPLOYERS
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(J) Disability retirement pension

- (1) Effective for disability eligibility prior to January 1, 2011
 - (a) Eligibility requirements - must have at least 5 years of Credited Service. The disability must be total and permanent as defined in the plan and the participant must be entitled to a Social Security disability pension award.
 - (b) Monthly pension - the normal retirement pension accrued to the date of disability, unreduced for early commencement and payable as of the effective date of the Social Security disability award.
- (2) Effective January 1, 2011, the disability retirement pension is eliminated for participants who meet the eligibility requirements in (J)(1)(a) on and after January 1, 2011.

(K) Benefits payable on other termination of employment

- (1) Eligibility requirements - must have completed 5 or more years of Vesting Service.
- (2) Monthly pension - the normal retirement pension accrued to the date of termination reduced for early commencement as in (I)(2), if applicable.

(L) Pre-retirement death benefit

- (1) Eligibility requirements - an active or terminated vested participant who has completed 5 years of Vesting Service.
- (2) Nonmarried participant (*effective for deaths prior to April 1, 2020, the date the plan became insolvent*) - lump sum payment equal to \$108 per year that contributions were made between January 1, 1962 and December 31, 1973, plus \$126 per year that contributions were made between January 1, 1974 and December 31, 1975 plus \$157.50 per year that contributions were made on and after January 1, 1976. The maximum single sum payable is \$5,512.50, subject to any restrictions under Code Section 432(f)(2).
- (3) Married participant - If eligible for early retirement at death, the eligible spouse will receive a monthly benefit equal to 50% of the normal retirement pension computed as of the date of death, reduced for early commencement as if the participant had retired the day before his death, and further reduced as if he had elected the continuation to the spouse under the 50% joint and survivor annuity option. If younger than early retirement age at death, the benefit will be determined as of the date of death but reduced as if he had retired at the earliest retirement age and further reduced as if the participant had

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

elected the continuation to the spouse under the 50% joint and survivor annuity. For deaths prior to April 1, 2020, if the value of this benefit is less than the lump sum death benefit in (2) above, the excess will be paid to the surviving spouse in a lump sum.

Monthly payments commence on the first day of the month following the later of the participant's death or the month the participant would have attained early retirement age and will be payable during the surviving spouse's lifetime.

(M) Normal and optional forms of payment

(1) Normal form

- (a) Married participant - automatic surviving spouse annuity providing a reduced pension payable to the retired participant during his lifetime with 50% continuing monthly for the life of his surviving spouse after his death. This is automatic unless the participant elects otherwise with the consent of his spouse.
- (b) Single participant (for benefits commencing on or after January 1, 2011) - life annuity.

(2) Optional forms

- (a) 75% Joint and Survivor Annuity - a reduced amount of pension is payable to the retired participant during his lifetime with the provision that after his death 75% of such reduced benefit shall continue to and for the lifetime of his eligible surviving spouse.
- (b) Five Year Certain and Life Annuity (for benefits commencing on or after January 1, 2011) A reduced pension is payable to the retired participant during his lifetime, with the provision that if his death occurs before he has received 60 monthly payments, such payments will continue to his designated beneficiary until a total of 60 monthly payments have been made.

- (3) Lump sum - payable if the actuarially equivalent present value of the vested accrued benefit is \$2,500 or less, subject to PBGC approval.

(N) Suspension of benefits

The retirement benefit otherwise payable to a pensioner shall be permanently suspended for each calendar month in which the pensioner completes 40 or more hours of service in the bookbinding industry, in an occupation in which the pensioner was employed at any time under the plan, and in the geographic area covered by the plan (as defined in Department of Labor Regulations Section 2530.203-3) at the time payment of benefits to the pensioner commenced.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(O) Increases for retired participants

- (1) Effective October 1, 1987 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on October 1, 1987 received a 10% increase in his monthly benefit.
- (2) Effective January 1, 1992 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 1992 received a 10% increase in his monthly benefit.
- (3) Effective January 1, 2002 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 2002 received a 5% increase in his monthly benefit.

(P) Changes in plan provisions since January 1, 2020

Effective April 1, 2020, the plan became insolvent and pension benefit amounts, as needed, were reduced to the PBGC guaranteed benefit level.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**Actuarial Valuation
as of January 1, 2021**

richard Gabriel associates
Employee Benefits Consultants and Actuaries



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601 Dresher Road, Suite 201

Horsham, Pennsylvania 19044-2203

September 24, 2021

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
601 Dresher Road, Suite 201
Horsham, PA 19044

Dear Board of Trustees:

This letter presents the results of our actuarial valuation of the Bindery Industry Employers GCC/IBT Pension Plan as of January 1, 2021. The plan became insolvent on April 1, 2020 and began receiving financial assistance from the Pension Benefit Guaranty Corporation (PBGC). The valuation was based on the plan provisions in effect on January 1, 2021 and reflects the reduction of benefits to the PBGC maximum guaranteed level.

The draft financial data was provided by the plan's auditor and the basic participant data by the plan administrator. The actuarial values were calculated by us on the basis of this data, our interpretation of the plan provisions, and the actuarial assumptions as disclosed in Appendix A. Highlights of the valuation appear in the Executive Summary.

The actuarial experience of the plan since the last valuation was more favorable than anticipated by the actuarial assumptions, producing a net actuarial gain of \$1,439,914. This gain was due almost entirely to the PBGC financial assistance of \$1,416,200 received in 2020 after the plan became insolvent on April 1, 2020. The plan assets earned 2.0% in 2020 on an actuarial value basis and 0.3% on a market value basis, compared to the assumed rate of return of 2.12%.

Plan benefits were reduced to the level of the PBGC guarantee upon the plan's insolvency. This change reduced the plan's unfunded accrued liability by \$770,932.

In order to better reflect actual experience of this plan and reasonable future expectations, we have made the following changes to the actuarial assumptions:

- The assumed interest rate was reduced from 2.12% for 20 years and 2.26% thereafter to 1.69% for 20 years and 1.66% thereafter, which mirrors the PBGC interest assumption for terminated plans in effect as of the valuation date.
- The assumed annual administrative expenses were increased from \$125,000 to \$150,000.

These changes increased the plan's unfunded accrued liability by \$1,177,598 and the normal cost by \$25,000.

The minimum required contribution has increased from \$10,856,200 in 2020 to \$12,720,616 in 2021 due to the plan's accumulated funding deficiency. The funding deficiency has increased from \$8,851,421 as of December 31, 2019 to \$10,815,012 as of December 31, 2020.

The expected employer contributions of \$34,230 for the 2021 plan year are insufficient to meet the minimum funding requirements. The maximum deductible contribution is \$29,611,760 for the 2021 plan year.

The Rehabilitation Plan ended upon the plan becoming insolvent on April 1, 2020. Also, due to the plan's insolvency, annual zone status certifications are not required after 2020.

A common measure of the level of funding of a pension plan is the ratio of the market value of plan assets to the value of accrued benefits. This ratio is 2.1% as compared to 2.0% on the last valuation. The above-mentioned assumption change significantly increased the liabilities, but this was mostly offset by the PBGC financial assistance and the reduction of benefits to the level of the PBGC guarantee.

ACTUARIAL CERTIFICATION

The information and results contained in this actuarial valuation report as of January 1, 2021 were prepared for the use of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and its auditors. The actuarial computations made are for purposes of determining the plan's funding requirements and accounting disclosures under FASB Accounting Standards Codification 960 (ASC 960). The report has been prepared for the purposes outlined herein and should not be relied upon for any other purpose. Determinations for purposes other than meeting the plan's funding and financial accounting requirements may be significantly different than the results presented in this report. To avoid misrepresentation, the report is intended to be used in its entirety.

Our calculations were based upon the participant data as of December 31, 2020, as provided by the plan's administrator, and the draft financial data as of December 31, 2020 received from the plan's auditor. While the scope of our engagement did not call for us to perform an audit or independent verification of this information, we have reviewed this information for reasonableness. The accuracy of the results is dependent upon the accuracy and completeness of the underlying information, which is the responsibility of those who supply the data.

The actuarial cost method and assumptions, other than those prescribed by law or regulations, are selected by the actuary. In our opinion, the actuarial methods used are appropriate for the purposes of the valuation, and each economic assumption (other than those prescribed by law or regulation) was selected from a range which represents our best estimate of anticipated experience under the plan.

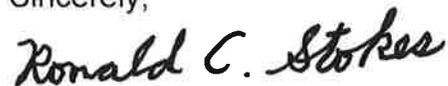
Furthermore, the demographic assumptions used, in the aggregate, are reasonable (taking into account the experience of the plan and reasonable expectations). In our opinion, the actuarial methods used are appropriate for purposes of the valuation and the actuarial assumptions used represent our best estimate of anticipated experience of this group.

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
September 24, 2021
Page Three

Future actuarial measurements may differ significantly from current measurements presented in this report due to such factors as the following: plan experience different from that anticipated by the economic or demographic assumptions, changes in economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for these measurements (such as the end of an amortization period or additional cost or contribution requirements based on the plan's funded status) and changes in plan provisions, accounting standards or applicable law. Due to the limited scope of the actuary's assignment, the actuary did not perform an analysis of the potential range of such future measurements.

We certify this report has been prepared in accordance with generally accepted actuarial principles and practices and, to the best of our knowledge, fairly presents the actuarial position of the plan as of January 1, 2021. The actuary and the firm responsible for this report have no conflicts of interest that may impair the objectivity of our work. We further certify that we meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.

Sincerely,



Ronald C. Stokes, FSA, MAAA
Enrolled Actuary No. 20-05287

RCS/vmd

binsreport2021-nc.wpd

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

EXECUTIVE SUMMARY

A summary of the principal results of the current and preceding actuarial valuations follows:

	<u>January 1, 2021</u>	<u>January 1, 2020</u>
(A) Number of participants		
• Active	21	31
• Vested terminated	233	247
• Retired and disabled	<u>450</u>	<u>455</u>
• Total	704	733
(B) Normal cost	\$ 172,039	\$ 155,006
(C) Unfunded accrued liability at the beginning of the plan year	\$20,588,783	\$21,058,487
(D) Various contribution levels		
• Contribution rate per shift	\$ 6.55	\$ 6.55
• Expected Employer contribution	\$ 34,230	\$ 50,016
• Actual Employer contribution	To be determined	\$ 40,756
• PBGC financial assistance	To be determined	\$ 1,416,200
• Minimum required as of the end of the plan year	\$12,720,616	\$10,856,200
• Maximum deductible contribution	\$29,611,760	\$29,029,339
• Amortization period	Infinite	Infinite
(E) Plan assets at the beginning of the plan year		
• Market value	\$ 436,712	\$ 436,930
• Actuarial value	\$ 434,755	\$ 427,480
(F) Value of accumulated plan benefits at the beginning of the plan year		
• Vested	\$20,924,315	\$21,337,651
• Nonvested	<u>15,759</u>	<u>13,867</u>
• Total	\$20,940,074	\$21,351,518
(G) Unfunded vested benefits	\$20,487,603	\$20,900,721
(H) Plan assets as a percentage of accumulated benefits		
• Market value	2.1%	2.0%
• Actuarial value	2.1%	2.0%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

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**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

I. PLAN ASSETS
(per draft Audit)

(A) Statement of plan assets as of December 31, 2020 at market value

Cash and equivalents	\$ 468,966
Mutual funds - Fixed income	36
Employers' contributions receivable	3,137
Accrued income	4
Prepaid expenses	<u>792</u>
Total assets	\$ 472,935
Administrative expenses payable	<u>(36,223)</u>
Net assets available for benefits	\$ 436,712

(B) Statement of changes in plan assets (market value)

Receipts	
Employers' contributions	\$ 40,756
PBGC funding	1,416,200
Interest and dividends	944
Net realized and unrealized gains/(losses)	<u>301</u>
Total receipts	\$ 1,458,201
Disbursements	
Benefit payments	\$ 1,290,005
Administrative expenses	168,414
Investment expenses	<u>0</u>
Total disbursements	\$ 1,458,419
Net receipts	\$ (218)
Plan assets	
January 1, 2020	\$ 436,930
December 31, 2020	\$ 436,712

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Determination of actuarial value of assets as of January 1, 2021

(1)	Actuarial value of Fund assets at January 1, 2020	\$ 427,480
(2)	(1) x 1.0212	\$ 436,543
(3)	Contributions to the Fund during year (including PBGC funding)	\$ 1,456,956
(4)	Interest on (3) from date of payment to December 31, 2020 at 2.12% per annum*	\$ 15,444
(5)	Disbursements (excluding investment expenses)	\$ 1,458,419
(6)	Interest on (5) to December 31, 2020 at 2.12% per annum**	\$ 16,748
(7)	Expected actuarial value at December 31, 2020 = (2) + (3) + (4) - (5) - (6)	\$ 433,776
(8)	Market value of Fund assets at December 31, 2020	\$ 436,712
(9)	Difference between market value and expected actuarial value = (8) - (7)	\$ 2,936
(10)	Preliminary actuarial value of assets = (7) + 1/3 of (9)	\$ 434,755
(11)	(8) x 1.20	\$ 524,054
(12)	(8) x 0.80	\$ 349,370
(13)	Actuarial value of Fund assets at January 1, 2021 = (10), but not more than (11) or less than (12)	\$ 434,755

(D) Valuation assets

For purposes of this valuation, the actuarial value of plan assets in (C)(13) of \$434,755 is used.

(E) Asset returns

Rate of return on market value of plan assets (net of investment expenses)	0.3%
Rate of return on actuarial value of plan assets (net of investment expenses)	2.0%

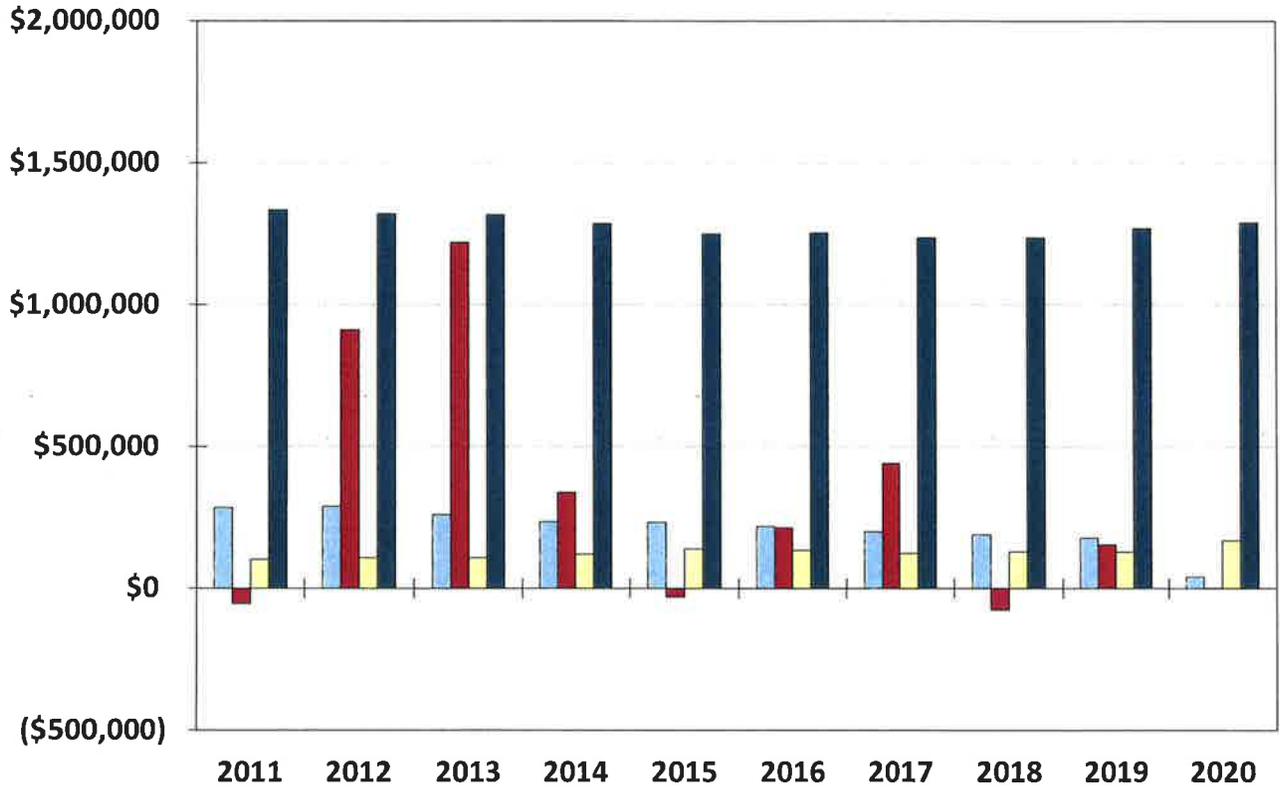
*Assumes that contributions occur on July 1, on average.

**Assumes disbursements are paid on the first day of the month.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART I

**HISTORY OF RECEIPTS AND DISBURSEMENTS
FOR PLAN YEARS ENDING DECEMBER 31**



■ Employer Contributions

■ Investment Earnings

■ Administrative Expenses

■ Benefit Payments

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

II. UNFUNDED ACCRUED LIABILITY

(A)	Unfunded accrued liability as of January 1, 2020	\$ 21,058,487
(B)	Normal cost for the plan year (with expenses)	\$ 155,006
(C)	Interest on (A) and (B) for one year	\$ 449,726
(D)	Employer contributions on account of the plan year	\$ 40,756
(E)	Interest on (D) from the dates paid to the end of the plan year*	\$ 432
(F)	Expected unfunded accrued liability as of January 1, 2021 = (A) + (B) + (C) - (D) - (E)	\$ 21,622,031
(G)	Actual unfunded accrued liability as of January 1, 2021, before changes	\$ 20,182,117
(H)	Actuarial gain (loss) = (F) - (G)	\$ 1,439,914
(I)	Change in unfunded accrued liability due to plan amendment**	\$ (770,932)
(J)	Change in unfunded accrued liability due to assumption change	\$ 1,177,598
(K)	Unfunded accrued liability as of January 1, 2021, after changes = (G) + (I) + (J)	\$ 20,588,783

* Contributions are assumed paid on July 1, 2020, on average.

** For valuation purposes, benefits were reduced to the PBGC maximum guaranteed benefit level effective April 1, 2020, the date of the plan's insolvency.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

III. FUNDING STANDARD ACCOUNT
(Plan year ending December 31, 2020)

(A)	Charges to Funding Standard Account	
(1)	Prior year funding deficiency	\$ 8,851,421
(2)	Normal cost for the plan year (with expenses)	155,006
(3)	Amortization charges (on \$13,895,441)	1,803,792
(4)	Interest on (1), (2) and (3)	<u>229,177</u>
(5)	Total charges	\$ 11,039,396
(B)	Credits to Funding Standard Account	
(1)	Prior year credit balance	\$ 0
(2)	Contributions for the plan year	40,756
(3)	Amortization credits (on \$1,688,375)	179,393
(4)	Interest on (1), (2) and (3)	<u>4,235</u>
(5)	Total credits	\$ 224,384
(C)	Credit balance (funding deficiency) as of December 31, 2020 = (B)(5) - (A)(5)	\$(10,815,012)

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IV. SUMMARY OF VALUATION RESULTS

All values shown are as of January 1, 2021

(A)	Normal cost (with expenses)	\$ 172,039
(B)	Accrued liability	
(1)	Present value of all benefits payable in future years:	
(a)	Active participants (21)	\$ 975,508
(b)	Vested terminated participants (233)	6,394,299
(c)	Retired participants (450)	<u>13,821,726</u>
(d)	Total (704)	\$ 21,191,533
(2)	Present value of future normal costs	\$ 167,995
(3)	Accrued liability = (1)(d) - (2)	\$ 21,023,538
(C)	Valuation assets	\$ 434,755
(D)	Unfunded accrued liability = (B)(3) - (C), but not less than zero	\$ 20,588,783

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

V. DEVELOPMENT OF CONTRIBUTION LEVELS

(A)	The minimum required contribution to avoid a funding deficiency in the funding standard account for the 2021 plan year is determined as follows:	
(1)	Charges to Funding Standard Account	
(a)	Prior year funding deficiency	\$10,815,012
(b)	Normal cost for the plan year	172,039
(c)	Amortization charges (on \$13,525,590)	1,863,778
(d)	Interest on (a), (b) and (c)	<u>217,179</u>
(e)	Total charges	\$13,068,008
(2)	Credits to Funding Standard Account	
(a)	Prior year credit balance	\$ 0
(b)	Amortization credits (on \$3,751,819)	341,619
(c)	Interest on (a) and (b)	<u>5,773</u>
(d)	Total credits	\$ 347,392
(3)	Minimum required contribution to be made at the end of the plan year equals excess, if any, of (1)(e) over (2)(d)	\$12,720,616

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(B) The maximum deductible contribution for the plan year ending December 31, 2021 is determined as follows:

(1)	Normal cost for the plan year	\$ 172,039
(2)	10 year amortization of unfunded actuarial accrued liability	2,217,582
(3)	Interest on (1) and (2)	<u>40,385</u>
(4)	Total	\$ 2,430,006
(5)	Minimum required contribution = (A)(3)	\$ 12,720,616
(6)	Full funding limitation = (C)(3)	\$ 21,111,680
(7)	Tax deductible limit equals (4), but not less than (5), nor more than (6); or (C)(2)(e), if greater	\$ 29,611,760

(C) Development of full funding limitation for maximum deductible purposes

(1)	Based on accrued liability	
(a)	Accrued liability (including normal cost)	\$ 21,195,577
(b)	Applicable assets (lesser of actuarial or market value)	\$ 434,755
(c)	Full funding limitation at end of year = [(a) - (b)] x 1.0169, but not less than zero	\$ 21,111,680
(2)	Based on 90% of RPA 94 current liability*	
(a)	Current liability projected to end of year	\$ 21,151,257
(b)	90% of (a)	\$ 19,036,131
(c)	Applicable assets projected to end of year	\$ 0
(d)	Full funding limitation = (b) - (c), but not less than zero	\$ 19,036,131
(e)	Unfunded current liability = [1.4 x (a)] - (c), but not less than zero	\$ 29,611,760
(3)	Full funding limit = greater of (1)(c) or (2)(d)	\$ 21,111,680

* Based on 2.08% interest, the RP-2014 Mortality Table with projected improvements for all healthy participants, and other assumptions as described in Appendix A.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(D) Schedule of amortization bases

<u>Why Established</u>	<u>Date Established</u>	<u>Initial Amount</u>	<u>Outstanding Balance</u>	<u>Years Remaining</u>	<u>Charge (Credit)</u>
Initial base	1/1/1977	\$ N/A	\$ 232,267	1	\$ 232,267
Plan amendment	1/1/1988	N/A	289,714	2	146,071
Plan amendment	1/1/1989	N/A	75,471	3	25,580
Plan amendment	1/1/1991	N/A	105,104	5	21,731
Plan amendment	1/1/1992	N/A	310,542	6	53,949
Assumption change	1/1/1994	N/A	39,321	3	13,327
Plan amendment	1/1/1998	N/A	60,929	12	5,558
Plan amendment	1/1/2001	N/A	608,419	15	45,491
Actuarial loss	1/1/2002	N/A	24,519	1	24,519
Plan amendment	1/1/2002	N/A	258,493	16	18,265
Actuarial loss	1/1/2003	N/A	123,983	2	62,511
Actuarial loss	1/1/2004	N/A	33,600	3	11,388
Actuarial loss	1/1/2005	233,248	70,567	4	18,088
Actuarial loss	1/1/2006	336,011	125,455	5	25,939
Actuarial gain	1/1/2007	(91,813)	(9,393)	1	(9,393)
Actuarial gain	1/1/2008	(98,446)	(19,452)	2	(9,807)
Actuarial loss	1/1/2009	2,784,110	797,256	3	270,218
Actuarial loss	1/1/2010	75,068	27,700	4	7,100
Actuarial loss	1/1/2011	141,739	63,211	5	13,069
Plan amendment	1/1/2011	(202,795)	(90,444)	5	(18,700)
Actuarial loss	1/1/2012	232,919	120,568	6	20,946
Assumption change	1/1/2012	310,195	160,575	6	27,896
Actuarial loss	1/1/2013	102,851	60,108	7	9,025
Assumption change	1/1/2013	(70,724)	(41,331)	7	(6,205)
Actuarial gain	1/1/2014	(397,300)	(256,893)	8	(34,026)
Actuarial gain	1/1/2015	(151,251)	(106,559)	9	(12,649)
Assumption change	1/1/2015	694,920	489,588	9	58,116
Actuarial gain	1/1/2016	(142,718)	(108,250)	10	(11,659)
Actuarial loss	1/1/2017	87,021	70,378	11	6,947
Actuarial gain	1/1/2018	(80,329)	(68,727)	12	(6,270)
Assumption change	1/1/2018	604,140	516,889	12	47,154
Actuarial gain	1/1/2019	(176,342)	(158,809)	13	(13,482)
Actuarial gain	1/1/2020	(722,535)	(681,115)	14	(54,127)
Assumption change	1/1/2020	8,150,575	7,683,335	14	610,576
Actuarial gain	1/1/2021	(1,439,914)	(1,439,914)	15	(107,660)
Plan amendment	1/1/2021	(770,932)	(770,932)	15	(57,641)
Assumption change	1/1/2021	1,177,598	1,177,598	15	88,047
Total			\$ 9,773,771		\$ 1,522,159

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(D) Schedule of amortization bases *(cont'd)*

Notes:

- (1) Outstanding balances are shown as of January 1, 2021, before any payments on account of the plan year.
- (2) Net outstanding balance of \$9,773,771 less credit balance/(funding deficiency) of \$(10,815,012) equals the unfunded accrued liability of \$20,588,783.
- (3) The years remaining for certain charge bases established on or before January 1, 2008 (including the initial base, actuarial losses and plan amendments) reflect the 5-year automatic extension effective January 1, 2008 approved by the IRS on March 18, 2009.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VI. ACTUARIAL PRESENT VALUE OF ACCUMULATED PLAN BENEFITS

(A) Actuarial Present Value of Accumulated Plan Benefits as of January 1, 2021

(1)	Vested benefits	
	(a) Retired participants and beneficiaries receiving payments (450)	\$ 13,821,726
	(b) Terminated vested participants (233)	6,394,299
	(c) Active participants (17)	<u>708,290</u>
	(d) Total (700)	\$ 20,924,315
(2)	Nonvested benefits (4)	<u>15,759</u>
(3)	Total accumulated plan benefits (704)	\$ 20,940,074
(4)	Plan assets (market value)	\$ 436,712
(5)	Unfunded vested benefits = (1)(d) - (4)	\$ 20,487,603
(6)	Plan assets as a percentage of the value of vested benefits = (4) ÷ (1)(d)	2.1%

(B) Change in Actuarial Present Value of Accumulated Plan Benefits

(1)	Actuarial present value of accumulated plan benefits as of January 1, 2020	\$ 21,351,518
(2)	Increase (decrease) during the year attributable to:	
	(a) Plan amendment*	\$ (766,157)
	(b) Change in actuarial assumptions	1,178,146
	(c) Benefits accumulated and actuarial (gains)/losses	27,594
	(d) Increase for interest due to the decrease in the discount period	438,978
	(e) Benefits paid	<u>(1,290,005)</u>
	(f) Net increase (decrease)	\$ (411,444)
(3)	Actuarial present value of accumulated plan benefits as of January 1, 2021	\$ 20,940,074

* For valuation purposes, benefits were reduced to the PBGC maximum guaranteed benefit level effective April 1, 2020, the date of the plan's insolvency.

Note: The present values shown above were calculated in accordance with Interpretations 1 and 2 of the American Academy of Actuaries. The assumed investment rate of return is based on an interest assumption of 1.69% for 20 years and 1.66% thereafter.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART II

COMPARISON OF LIABILITIES TO ASSETS FOR PLAN YEARS BEGINNING JANUARY 1

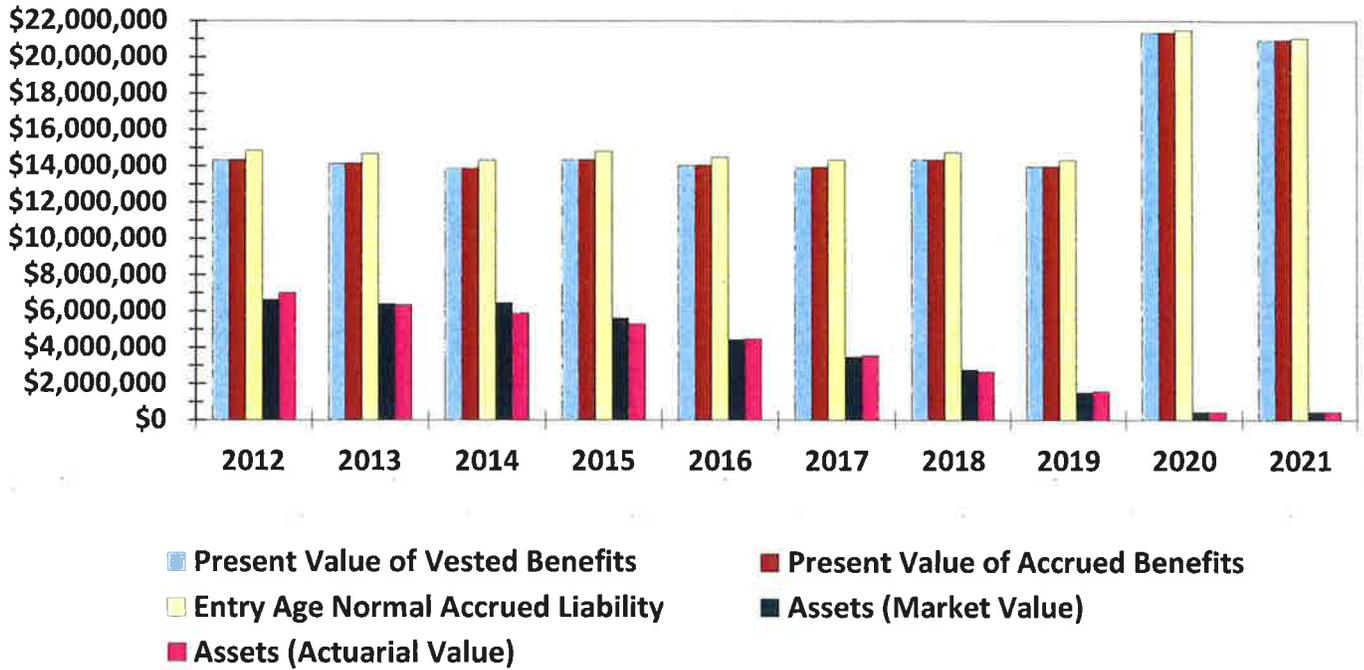
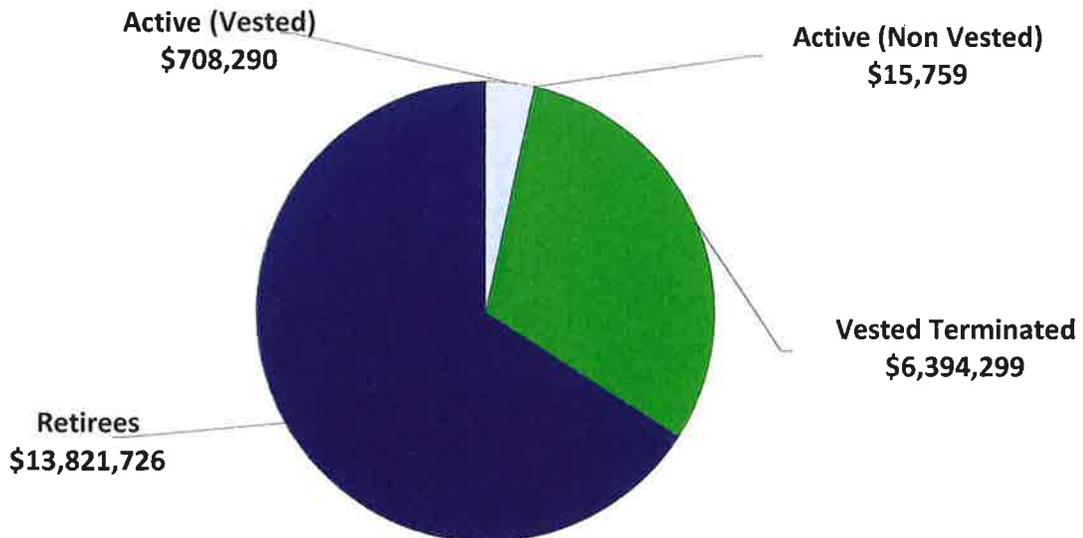


CHART III

BREAKDOWN OF PRESENT VALUE OF ACCUMULATED BENEFITS BY CATEGORY



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Unfunded Vested Benefits (Presumptive Method)

<u>Date</u>	<u>Vested Benefits Interest Rate</u>	<u>Value of Vested Benefits</u>	<u>Asset Value⁽¹⁾</u>	<u>Unfunded Vested Benefits⁽²⁾</u>
12/31/2000	8.0%	\$ 13,161,490	\$ 13,765,888	\$ (604,398)
12/31/2001	8.0%	13,729,764	12,855,490	874,274
12/31/2002	8.0%	13,966,603	11,234,306	2,732,297
12/31/2003	7.5%	14,352,701	12,245,649	2,107,052
12/31/2004	7.5%	14,617,090	12,500,580	2,116,510
12/31/2005	7.5%	14,525,963	12,170,594	2,355,369
12/31/2006	7.5%	14,482,705	12,569,788	1,912,917
12/31/2007	7.5%	14,391,719	12,337,060	2,054,659
12/31/2008	7.5%	14,644,094	7,591,676	7,052,418
12/31/2009	7.5%	14,419,795	8,014,810	6,404,985
12/31/2010	7.5%	14,402,684 ⁽³⁾	7,831,775	6,570,909
12/31/2011	7.5%	14,511,116 ⁽³⁾	6,626,197	7,884,919
12/31/2012	7.5%	14,306,141 ⁽³⁾	6,398,374	7,907,767
12/31/2013	7.5%	14,033,278 ⁽³⁾	6,451,692	7,581,586
12/31/2014 ⁽⁴⁾	7.5%	13,811,434 ⁽³⁾	5,618,297	8,193,137
12/31/2015	7.5%	14,171,573 ⁽³⁾	4,430,843	9,740,730
12/31/2016	7.5%	14,059,344 ⁽³⁾	3,475,390	10,583,954
12/31/2017	7.5%	13,881,391 ⁽³⁾	2,756,882	11,124,509
12/31/2018	7.0%	14,078,232 ⁽³⁾	1,503,084	12,575,148
12/31/2019	7.0%	13,337,287 ⁽³⁾	436,930	12,900,357
12/31/2020	2.12%/2.26%	19,828,945 ⁽³⁾	436,712	19,392,233

Employer Withdrawal Liability is expected for any employer who withdraws from the plan prior to January 1, 2022.

Notes:

- (1) Asset values are market values.
- (2) The amount of Unfunded Vested Benefits is obtained by subtracting the market value of the plan assets from the value of vested benefits determined using ongoing plan assumptions as outlined in Appendix A.
- (3) Includes the additional value of vested adjustable benefits as of January 1, 2011 of \$182,312. For withdrawal liability purposes, this amount is being amortized over 15 years.
- (4) Effective December 31, 2014, excludes effect of any assumption changes effective on the first day of the next plan year.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VII. PROJECTED PENSION PAYMENTS

<u>Year</u>	<u>Number of Recipients</u>	<u>Amount</u>
2021	452	\$ 1,238,000
2022	432	1,214,000
2023	412	1,187,000
2024	391	1,154,000
2025	371	1,133,000
2026	351	1,094,000
2027	331	1,074,000
2028	310	1,061,000
2029	290	1,038,000
2030	270	1,014,000

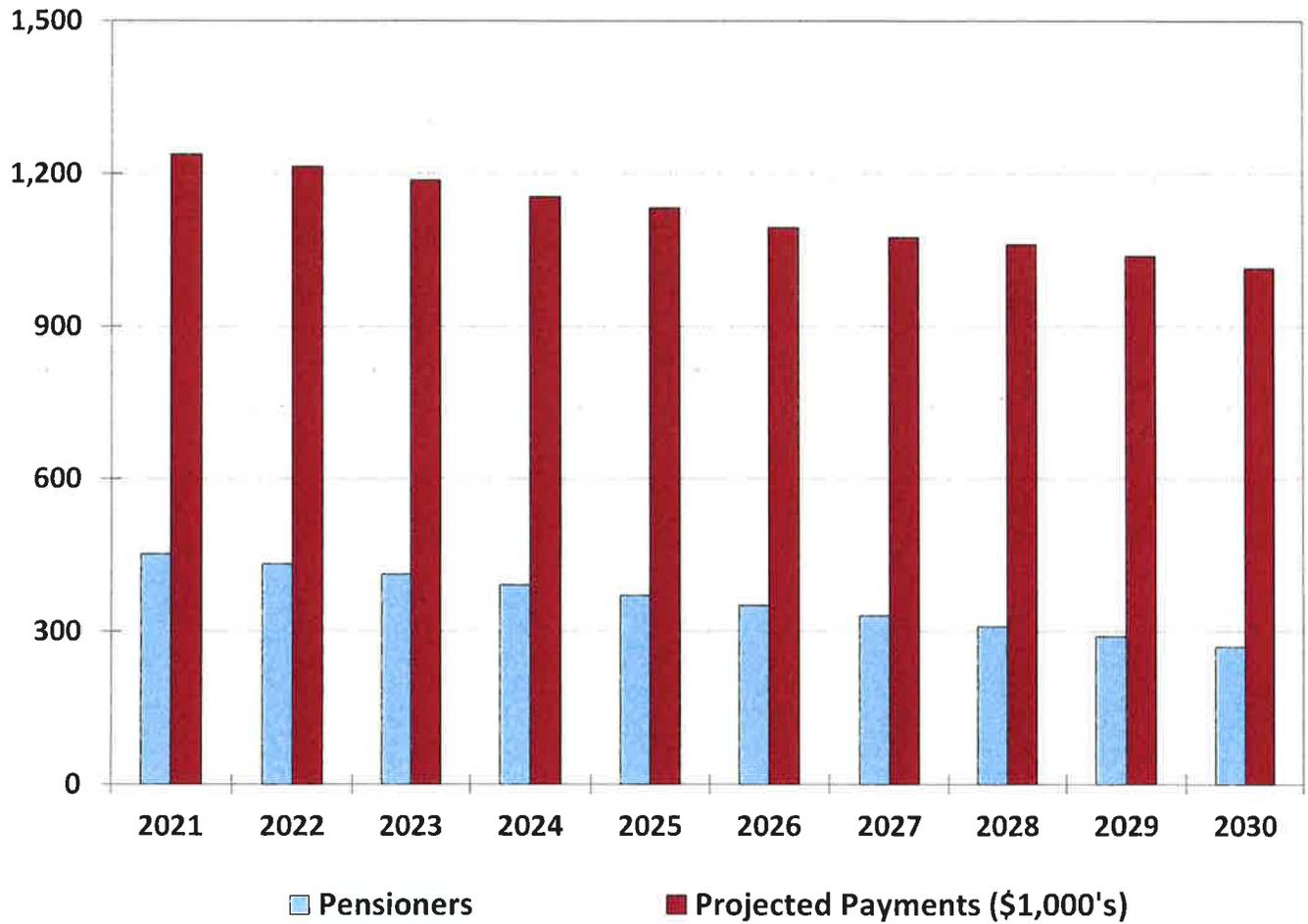
Notes:

- (1) Survivorship is based on the valuation assumptions.
- (2) For actives and those who have terminated with a vested deferred pension, this projection reflects only normal retirement pension benefits commencing at the normal retirement age. All current pension recipients are included.
- (3) No payments resulting from future terminations, disablements or deaths are reflected.
- (4) It is assumed that no future new entrants will be eligible for pension benefits during the next ten years.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART IV

PROJECTED PENSIONERS AND ANNUAL PENSION PAYMENTS



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VIII. PARTICIPANT DATA

**TABLE 1. DISTRIBUTION OF ACTIVE PARTICIPANTS
BY AGE AND SERVICE GROUPS**

As of January 1, 2021

Age Last Birthday	Completed Years of Credited Service									
	1-4	5-9	10-14	15-19	20-24	25-29	30-34	35-39	40+	Total
Under 25	1									1
25 - 29										0
30 - 34										0
35 - 39	1	1								2
40 - 44					1					1
45 - 49		2		1						3
50 - 54	1		1	1						3
55 - 59	1		1			2		2		6
60 - 64	1						1	1	1	4
65 - 69			1							1
70 & over										0
Total	5	3	3	2	1	2	1	3	1	21

Note: No active participant has less than one year of benefit service.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**TABLE 2. DISTRIBUTION OF INACTIVE PARTICIPANTS
BY AGE GROUP**

Terminated Vested Participants and Beneficiaries with Rights to Future Benefits

<u>Age Last Birthday</u>	<u>Number of Participants</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 30	1	\$ 55.65	\$ 55.65
30 - 34	3	363.06	121.02
35 - 39	11	1,172.66	106.61
40 - 44	22	3,799.92	172.72
45 - 49	21	3,813.41	181.59
50 - 54	52	9,412.44	181.01
55 - 59	66	11,773.90	178.39
60 - 64	40	9,424.43	235.61
65 & over	<u>17</u>	<u>2,939.53</u>	<u>172.91</u>
Total	233	\$42,755.00	\$183.50

Normal, Early & Disability Retirements and Beneficiaries

<u>Age Last Birthday</u>	<u>Number of Participants*</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 55	3	\$ 580.75	\$193.58
55 - 59	20	2,858.85	142.94
60 - 64	44	9,631.06	218.89
65 - 69	81	21,291.76	262.86
70 - 74	72	19,342.90	268.65
75 - 79	86	19,891.30	231.29
80 - 84	76	18,980.44	249.74
85 - 89	39	7,595.18	194.75
90 & over	<u>31</u>	<u>4,666.75</u>	<u>150.54</u>
Total	452	\$104,838.99	\$231.94

*Includes two alternate payees under a qualified domestic relations order (QDRO).

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IX. SUMMARY OF PARTICIPANT DATA

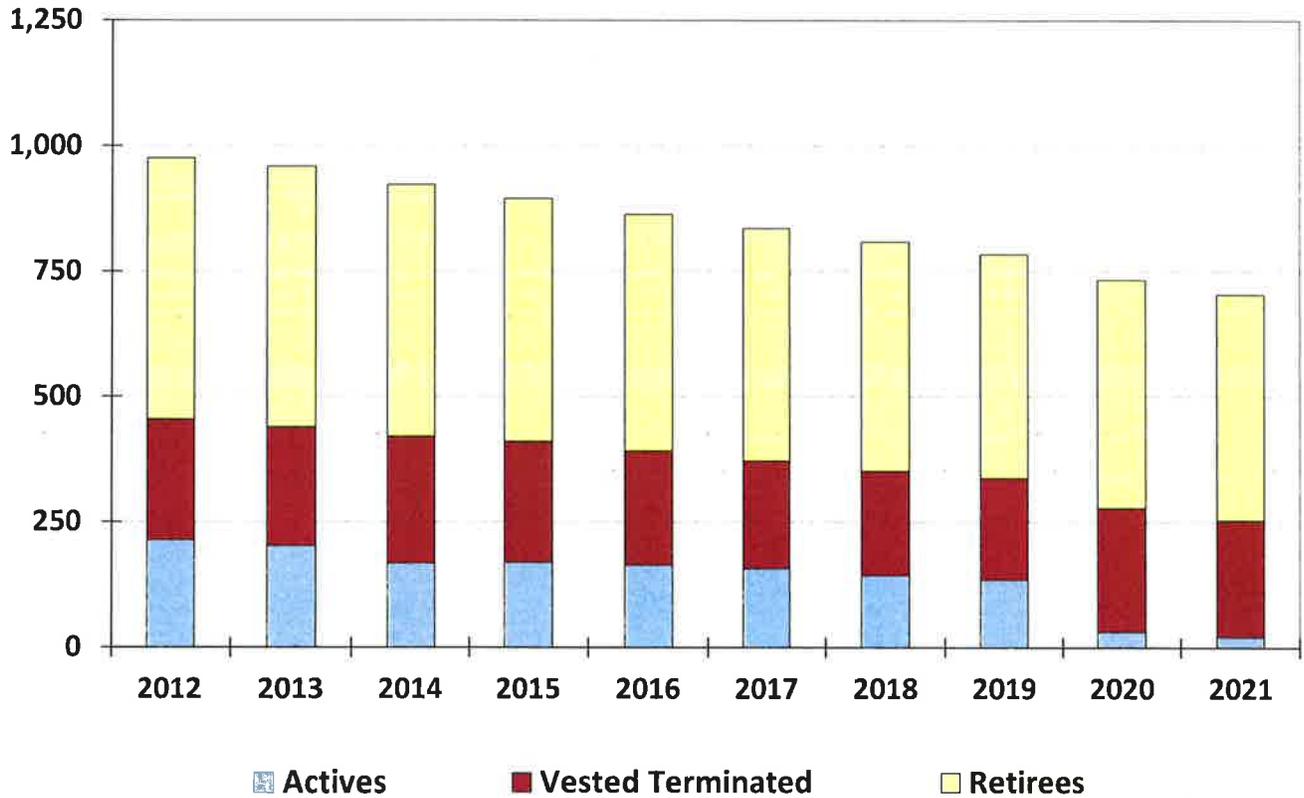
	<u>January 1, 2021</u>	<u>January 1, 2020</u>
(A) Active Participants		
(1) Number	21	31
(2) Average benefit service to date	18.2	19.6
(3) Average attained age	52.7	52.8
(4) Accrued annual pension		
(a) Total	\$ 56,701	\$ 94,794
(b) Average	\$ 2,700	\$ 3,058
(5) Projected annual pension		
(a) Total	\$ 93,153	\$ 150,833
(b) Average	\$ 4,436	\$ 4,866
(B) Vested terminated participants		
(1) Number	233	247
(2) Accrued annual pension		
(a) Total	\$ 507,453	\$ 589,389
(b) Average	\$ 2,178	\$ 2,386
(C) Disabled pensioners		
(1) Number	28	29
(2) Annual pension		
(a) Total	\$ 86,695	\$ 93,742
(b) Average	\$ 3,096	\$ 3,232
(D) Other pensioners and beneficiaries		
(1) Number	424*	428*
(2) Annual pension		
(a) Total	\$1,171,373	\$1,193,037
(b) Average	\$ 2,763	\$ 2,787

* Two participants are both a pensioner and a beneficiary. Pensioners include two alternate payees under a qualified domestic relations order (QDRO).

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART V

PARTICIPANT CENSUS COMPARISON



	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>
Actives	214	202	168	169	164	157	144	135	31	21
Vested Terminated	241	238	253	242	228	215	208	203	247	233
Retirees	521	519	502	484	472	464	457	446	455	450

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

X. RECONCILIATION OF CENSUS DATA

	<u>Actives</u>	<u>Terminated Vesteds</u>	<u>Retirees, Disabled Retirees and Beneficiaries*</u>	<u>Total</u>
Participants as of 1/1/2020	31	247	457	735
New participants	2	0	0	2
Reemployed participants	0	0	0	0
Nonvested terminations	0	(1)	0	(1)
Vested terminations	(9)	9	0	0
Retirements	(3)	(22)	25	0
Deaths with beneficiary	0	0	(3)	(3)
Deaths without beneficiary	0	(1)	(30)	(31)
Deaths with lump sum paid	0	0	0	0
New beneficiaries	0	0	3	3
Other	0	1	0	1
Benefits expired	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Participants as of 1/1/2021	21	233	452	706

*Retirees include two alternate payees under a qualified domestic relations order (QDRO) as of January 1, 2020 and January 1, 2021.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

ACTUARIAL METHODS AND ASSUMPTIONS

(A) Actuarial cost method

Entry age normal.

(B) Asset valuation method

Plan assets are valued using an actuarial smoothing method. Beginning with the January 1, 1995 plan year, the actuarial value of assets as of each valuation date is equal to the prior plan year's actuarial value adjusted to reflect contributions and disbursements, and then increased to reflect interest at the assumed investment rate. This value is then adjusted, up or down, by one-third of the difference between such value and the actual market value. In no event will the actuarial value of assets be less than 80% or more than 120% of the actual market value.

(C) Persons included

Based on data provided to us, all persons entitled to coverage under the plan as of the valuation date are included in the calculations.

(D) Significant actuarial assumptions

(1) Investment return

1.69% for 20 years and 1.66% thereafter, net of investment expenses.

(2) Retirement rates

<u>Age</u>	<u>Rate</u>
55 - 61	2%
62	15%
63	10%
64	10%
65	40%
66 - 69	33%
70	100%

Terminated vested participants are assumed to retire at age 65 or the valuation date, if later. Spouses of deceased terminated vested participants are assumed to retire when the participant would have attained age 65.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(3) Mortality

The following headcount-weighted RPH-2014 Mortality Tables (Male/Female) are used:

- (a) Pre-retirement - RPH-2014 Blue Collar Employee Mortality Table with a one-year setback to reflect expected mortality improvement.
- (b) Post-retirement

Not disabled: RPH-2014 Blue Collar Healthy Annuitant Mortality Table with a one-year setforward (reduced from a prior two-year setforward) to reflect expected mortality improvement.

Disabled lives: 150% of the RPH-2014 Disabled Retiree Mortality Table.

(4) Withdrawal from service

- (a) Select rates are used in the first 5 years of service.

<u>Years of Service</u>	<u>Rate</u>
0	30%
1	20%
2	15%
3	15%
4	13%

- (b) After 5 years of service, turnover rates vary by attained age.

<u>Age</u>	<u>Rate</u>
25	8%
30	7%
35	7%
40	6%
45	6%
50	6%
55	3%
60	3%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(5) Disability

100% of the rates developed in a 1955 study of experience among several large industrial employee groups.

(6) Hours of work

It was assumed that each participant will work the same number of shifts in each future year that he worked in the most recent plan year.

(7) Allowance for other expenses

Administrative expenses payable from the trust are assumed to be covered by a \$150,000 addition to the normal cost.

(8) Expected employer contributions

Employees are assumed to work the same number of shifts in future years that they worked in the most recent plan year. At an annual rate of 5,226 shifts (the 2020 total for actives) and the contribution rate of \$6.55 per shift for the remaining employer), expected contributions are \$34,230 for 2021.

(9) Marriage

It was assumed that 80% of active and terminated vested participants are married with females assumed to be three years younger than males.

(10) Terminated vested participants

Terminated vested participants over age 70 are assigned a 50% probability of collecting their benefits.

(E) Data qualifications

If the date of birth was missing, the participant was assumed to be hired at age 30.

(F) Change in actuarial methods and assumptions

The actuarial methods and assumptions are the same as those used in the prior valuation except as follows:

- The assumed interest rate was reduced from 2.12% for 20 years and 2.26% thereafter to 1.69% for 20 years and 1.66% thereafter, which reflects the PBGC interest assumption for terminated plans in effect as of the current valuation date.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

- The assumed annual administrative expenses were increased from \$125,000 to \$150,000.

(G) Justification for changes in actuarial methods and/or assumptions

- The plan has not terminated nor has a mass withdrawal been declared by the Board of Trustees. However, the plan became insolvent as of April 1, 2020 and is now receiving financial assistance from the PBGC. The PBGC quarterly payments to the plan are just sufficient to cover benefit payments and expenses. Consequently, with the low value of assets, the investment return is minimal. The investment return in 2020, the first year of insolvency, was 0.3%.
- Since this plan is age-heavy with only one small contributing employer remaining, the liquidity of assets needed to pay the pension benefits provides no opportunity for long-term investment.
- Plan termination interest rate assumptions, which reflect rates at which annuities could be currently purchased, are now the best measure of the plan's liabilities in the absence of investable assets.
- The assumed annual administrative expenses were increased due to recent actual experience (\$168,000 in 2020) and expectations for 2021.

(H) Basis for selection of demographic assumptions

Demographic assumptions are based on national tables, as periodically updated, which are determined by the actuary to be appropriate for this plan. In the case of assumptions for which the experience of the plan is credible, plan experience is used. For example, administrative expenses are determined from recent experience, per the plan audit. The retirement assumption is determined from plan experience. These assumptions are periodically adjusted in light of developing experience.

(I) Basis for selection of economic assumptions

Interest assumptions are based on PBGC interest rates in the absence of investable assets. Hours worked in the coming year are assumed to be the same as the previous year. These assumptions are periodically adjusted in light of developing experience.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

PLAN SUMMARY

(As of January 1, 2021, after insolvency)

(A) Effective date and plan year

The effective date of the plan is January 1, 1962. As part of the Rehabilitation Plan, adjustable benefits were reduced effective January 1, 2011, including the change to the normal form of benefits from a five year certain and life annuity to a life annuity and the elimination of the disability benefit. Effective April 1, 2020, the plan became insolvent and pension benefit amounts, as needed, were reduced to the PBGC guaranteed benefit level.

The plan year is the calendar year.

(B) Eligibility for coverage

An employee who is a member of an Eligible Employee Classification becomes a participant in the plan on the first day of the month coincident with or next following the completion of one year of service. Journeymen Bookbinders become participants on the date of covered employment.

(C) Employee contributions

None.

(D) Normal retirement date

The normal retirement date is the first day of the month coincident with or next following the later of the attainment of age 65 or the 5th anniversary of plan participation. A participant cannot retire prior to participating in the plan for at least 5 years.

(E) Employment after normal retirement date

If employment continues beyond the normal retirement date, pension payments will not commence until actual retirement. However, pension payments will commence no later than April 1 of the calendar year following the year in which the participant attains age 70-1/2, if employment continues beyond such date. Additional pension credits continue to accrue until the actual retirement date.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(F) Break in service

A temporary break in service occurs if less than 60 shifts are worked in two consecutive plan years and less than 52 shifts in at least one of them. No break shall occur, however, during periods of authorized leaves of absence, military service, sickness, accident or job-protected leave under the Family Medical Leave Act of 1993. A temporary break in service becomes a permanent break in service when the period of temporary break equals or exceeds the greater of five years or credited service accumulated prior to the temporary break. A permanent break results in forfeiture of all credited service unless the participant has at least 5 years of vesting service.

(G) Credited service

Benefit accrual - one full year is credited for each plan year in which the participant is credited with at least 220 shifts. Fractional years are credited in years in which a participant works fewer than 220 shifts. Credited service is reduced by 1/10 for each 22 shifts less than 220 that the participant works in each plan year. No service credit is counted until a participant has completed two years of continuous service. Once two years of continuous service have been earned, service is retroactively credited.

Vesting - one year of Vesting Service is credited for each plan year in which at least 103 shifts (equivalent of 750 hours) are credited. No partial years are credited for vesting purposes.

(H) Normal retirement pension

- (1) Eligibility requirements - must be a participant at Normal Retirement Date and retire on or after that date.
- (2) Monthly pension - \$14.00 per month per year of Credited Service with no maximum on service. For valuation purposes, this benefit rate was reduced to the PBGC maximum guaranteed benefit level of \$13.25 per month effective April 1, 2020, the date the plan became insolvent.

(I) Early retirement pension

- (1) Eligibility requirements - must have reached age 55 with at least 5 years of Vesting Service.
- (2) Monthly pension - The normal retirement pension accrued to the early retirement date reduced by ½% for each month that the early retirement date precedes the Normal Retirement Date.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(J) Disability retirement pension

- (1) Effective for disability eligibility prior to January 1, 2011
 - (a) Eligibility requirements - must have at least 5 years of Credited Service. The disability must be total and permanent as defined in the plan and the participant must be entitled to a Social Security disability pension award.
 - (b) Monthly pension - the normal retirement pension accrued to the date of disability, unreduced for early commencement and payable as of the effective date of the Social Security disability award.
- (2) Effective January 1, 2011, the disability retirement pension is eliminated for participants who meet the eligibility requirements in (J)(1)(a) on and after January 1, 2011.

(K) Benefits payable on other termination of employment

- (1) Eligibility requirements - must have completed 5 or more years of Vesting Service.
- (2) Monthly pension - the normal retirement pension accrued to the date of termination reduced for early commencement as in (I)(2), if applicable.

(L) Pre-retirement death benefit

- (1) Eligibility requirements - an active or terminated vested participant who has completed 5 years of Vesting Service.
- (2) Nonmarried participant (*effective for deaths prior to April 1, 2020, the date the plan became insolvent*) - lump sum payment equal to \$108 per year that contributions were made between January 1, 1962 and December 31, 1973, plus \$126 per year that contributions were made between January 1, 1974 and December 31, 1975 plus \$157.50 per year that contributions were made on and after January 1, 1976. The maximum single sum payable is \$5,512.50, subject to any restrictions under Code Section 432(f)(2).
- (3) Married participant - If eligible for early retirement at death, the eligible spouse will receive a monthly benefit equal to 50% of the normal retirement pension computed as of the date of death, reduced for early commencement as if the participant had retired the day before his death, and further reduced as if he had elected the continuation to the spouse under the 50% joint and survivor annuity option. If younger than early retirement age at death, the benefit will be determined as of the date of death but reduced as if he had retired at the earliest retirement age and further reduced as if the participant had

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

elected the continuation to the spouse under the 50% joint and survivor annuity. For deaths prior to April 1, 2020, if the value of this benefit is less than the lump sum death benefit in (2) above, the excess will be paid to the surviving spouse in a lump sum.

Monthly payments commence on the first day of the month following the later of the participant's death or the month the participant would have attained early retirement age and will be payable during the surviving spouse's lifetime.

(M) Normal and optional forms of payment

(1) Normal form

(a) Married participant - automatic surviving spouse annuity providing a reduced pension payable to the retired participant during his lifetime with 50% continuing monthly for the life of his surviving spouse after his death. This is automatic unless the participant elects otherwise with the consent of his spouse.

(b) Single participant (for benefits commencing on or after January 1, 2011) - life annuity.

(2) Optional forms

(a) 75% Joint and Survivor Annuity - a reduced amount of pension is payable to the retired participant during his lifetime with the provision that after his death 75% of such reduced benefit shall continue to and for the lifetime of his eligible surviving spouse.

(b) Five Year Certain and Life Annuity (for benefits commencing on or after January 1, 2011) A reduced pension is payable to the retired participant during his lifetime, with the provision that if his death occurs before he has received 60 monthly payments, such payments will continue to his designated beneficiary until a total of 60 monthly payments have been made.

(3) Lump sum - payable if the actuarially equivalent present value of the vested accrued benefit is \$2,500 or less, subject to PBGC approval.

(N) Suspension of benefits

The retirement benefit otherwise payable to a pensioner shall be permanently suspended for each calendar month in which the pensioner completes 40 or more hours of service in the bookbinding industry, in an occupation in which the pensioner was employed at any time under the plan, and in the geographic area covered by the plan (as defined in Department of Labor Regulations Section 2530.203-3) at the time payment of benefits to the pensioner commenced.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(O) Increases for retired participants

- (1) Effective October 1, 1987 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on October 1, 1987 received a 10% increase in his monthly benefit.
- (2) Effective January 1, 1992 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 1992 received a 10% increase in his monthly benefit.
- (3) Effective January 1, 2002 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 2002 received a 5% increase in his monthly benefit.

Form 5500Department of the Treasury
Internal Revenue ServiceDepartment of Labor
Employee Benefits Security
Administration

Pension Benefit Guaranty Corporation

Annual Return/Report of Employee Benefit Plan

This form is required to be filed for employee benefit plans under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and sections 6057(b) and 6058(a) of the Internal Revenue Code (the Code).

▶ **Complete all entries in accordance with the instructions to the Form 5500.**OMB Nos. 1210-0110
1210-0089**2021****This Form is Open to Public Inspection****Part I Annual Report Identification Information**For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021

- A** This return/report is for: a multiemployer plan a multiple-employer plan (Filers checking this box must attach a list of participating employer information in accordance with the form instructions.)
- a single-employer plan a DFE (specify) _____
- B** This return/report is: the first return/report the final return/report
- an amended return/report a short plan year return/report (less than 12 months)
- C** If the plan is a collectively-bargained plan, check here. ▶
- D** Check box if filing under: Form 5558 automatic extension the DFVC program
- special extension (enter description)
- E** If this is a retroactively adopted plan permitted by SECURE Act section 201, check here. ▶

Part II Basic Plan Information—enter all requested information

1a Name of plan <u>BINDERY INDUSTRY EMPLOYERS GCC / IBT PENSION PLAN</u>	1b Three-digit plan number (PN) ▶ <u>001</u>
	1c Effective date of plan <u>01/01/1962</u>
2a Plan sponsor's name (employer, if for a single-employer plan) Mailing address (include room, apt., suite no. and street, or P.O. Box) City or town, state or province, country, and ZIP or foreign postal code (if foreign, see instructions) <u>BOT-BIE GCC / IBT PENSION PLAN</u> <u>601 DRESHER ROAD</u> <u>SUITE 201</u> <u>HORSHAM, PA 19044-2203</u>	2b Employer Identification Number (EIN) <u>23-6209755</u>
	2c Plan Sponsor's telephone number <u>215-773-0900</u>
	2d Business code (see instructions) <u>323100</u>

Caution: A penalty for the late or incomplete filing of this return/report will be assessed unless reasonable cause is established.

Under penalties of perjury and other penalties set forth in the instructions, I declare that I have examined this return/report, including accompanying schedules, statements and attachments, as well as the electronic version of this return/report, and to the best of my knowledge and belief, it is true, correct, and complete.

SIGN HERE	<u>Filed with authorized/valid electronic signature.</u>	<u>10/14/2022</u>	<u>JOHN POTTS</u>
	Signature of plan administrator	Date	Enter name of individual signing as plan administrator
SIGN HERE			
	Signature of employer/plan sponsor	Date	Enter name of individual signing as employer or plan sponsor
SIGN HERE			
	Signature of DFE	Date	Enter name of individual signing as DFE

For Paperwork Reduction Act Notice, see the Instructions for Form 5500.

Form 5500 (2021)
v. 210624

3a Plan administrator's name and address <input checked="" type="checkbox"/> Same as Plan Sponsor	3b Administrator's EIN 3c Administrator's telephone number <div style="background-color: #cccccc; height: 40px; width: 100%;"></div>																		
4 If the name and/or EIN of the plan sponsor or the plan name has changed since the last return/report filed for this plan, enter the plan sponsor's name, EIN, the plan name and the plan number from the last return/report: a Sponsor's name c Plan Name	4b EIN 4d PN																		
5 Total number of participants at the beginning of the plan year	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">5</td> <td style="text-align: right;">704</td> </tr> </table>	5	704																
5	704																		
6 Number of participants as of the end of the plan year unless otherwise stated (welfare plans complete only lines 6a(1) , 6a(2) , 6b , 6c , and 6d). a(1) Total number of active participants at the beginning of the plan year..... a(2) Total number of active participants at the end of the plan year b Retired or separated participants receiving benefits..... c Other retired or separated participants entitled to future benefits d Subtotal. Add lines 6a(2) , 6b , and 6c e Deceased participants whose beneficiaries are receiving or are entitled to receive benefits. f Total. Add lines 6d and 6e g Number of participants with account balances as of the end of the plan year (only defined contribution plans complete this item) h Number of participants who terminated employment during the plan year with accrued benefits that were less than 100% vested	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">6a(1)</td> <td style="text-align: right;">21</td> </tr> <tr> <td>6a(2)</td> <td style="text-align: right;">23</td> </tr> <tr> <td>6b</td> <td style="text-align: right;">411</td> </tr> <tr> <td>6c</td> <td style="text-align: right;">211</td> </tr> <tr> <td>6d</td> <td style="text-align: right;">645</td> </tr> <tr> <td>6e</td> <td style="text-align: right;">41</td> </tr> <tr> <td>6f</td> <td style="text-align: right;">686</td> </tr> <tr> <td>6g</td> <td></td> </tr> <tr> <td>6h</td> <td style="text-align: right;">0</td> </tr> </table>	6a(1)	21	6a(2)	23	6b	411	6c	211	6d	645	6e	41	6f	686	6g		6h	0
6a(1)	21																		
6a(2)	23																		
6b	411																		
6c	211																		
6d	645																		
6e	41																		
6f	686																		
6g																			
6h	0																		
7 Enter the total number of employers obligated to contribute to the plan (only multiemployer plans complete this item).....	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">7</td> <td style="text-align: right;">1</td> </tr> </table>	7	1																
7	1																		
8a If the plan provides pension benefits, enter the applicable pension feature codes from the List of Plan Characteristics Codes in the instructions: 1B b If the plan provides welfare benefits, enter the applicable welfare feature codes from the List of Plan Characteristics Codes in the instructions:																			
9a Plan funding arrangement (check all that apply) (1) <input type="checkbox"/> Insurance (2) <input type="checkbox"/> Code section 412(e)(3) insurance contracts (3) <input checked="" type="checkbox"/> Trust (4) <input type="checkbox"/> General assets of the sponsor	9b Plan benefit arrangement (check all that apply) (1) <input type="checkbox"/> Insurance (2) <input type="checkbox"/> Code section 412(e)(3) insurance contracts (3) <input checked="" type="checkbox"/> Trust (4) <input type="checkbox"/> General assets of the sponsor																		
10 Check all applicable boxes in 10a and 10b to indicate which schedules are attached, and, where indicated, enter the number attached. (See instructions)																			
a Pension Schedules (1) <input checked="" type="checkbox"/> R (Retirement Plan Information) (2) <input checked="" type="checkbox"/> MB (Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information) - signed by the plan actuary (3) <input type="checkbox"/> SB (Single-Employer Defined Benefit Plan Actuarial Information) - signed by the plan actuary	b General Schedules (1) <input checked="" type="checkbox"/> H (Financial Information) (2) <input type="checkbox"/> I (Financial Information – Small Plan) (3) <input type="checkbox"/> A (Insurance Information) (4) <input checked="" type="checkbox"/> C (Service Provider Information) (5) <input type="checkbox"/> D (DFE/Participating Plan Information) (6) <input type="checkbox"/> G (Financial Transaction Schedules)																		

Part III Form M-1 Compliance Information (to be completed by welfare benefit plans)

11a If the plan provides welfare benefits, was the plan subject to the Form M-1 filing requirements during the plan year? (See instructions and 29 CFR 2520.101-2.) Yes No

If "Yes" is checked, complete lines 11b and 11c.

11b Is the plan currently in compliance with the Form M-1 filing requirements? (See instructions and 29 CFR 2520.101-2.) Yes No

11c Enter the Receipt Confirmation Code for the 2021 Form M-1 annual report. If the plan was not required to file the 2021 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. (Failure to enter a valid Receipt Confirmation Code will subject the Form 5500 filing to rejection as incomplete.)

Receipt Confirmation Code _____

**SCHEDULE MB
(Form 5500)**

Department of the Treasury
Internal Revenue Service

Department of Labor
Employee Benefits Security Administration
Pension Benefit Guaranty Corporation

**Multiemployer Defined Benefit Plan and Certain
Money Purchase Plan Actuarial Information**

This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA) and section 6059 of the Internal Revenue Code (the Code).

▶ **File as an attachment to Form 5500 or 5500-SF.**

OMB No. 1210-0110

2021

**This Form is Open to Public
Inspection**

For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021

▶ **Round off amounts to nearest dollar.**

▶ **Caution:** A penalty of \$1,000 will be assessed for late filing of this report unless reasonable cause is established.

A Name of plan <u>BINDERY INDUSTRY EMPLOYERS GCC / IBT PENSION PLAN</u>	B Three-digit plan number (PN) ▶ <u>001</u>
C Plan sponsor's name as shown on line 2a of Form 5500 or 5500-SF <u>BOT-BIE GCC / IBT PENSION PLAN</u>	D Employer Identification Number (EIN) <u>23-6209755</u>

E Type of plan: (1) Multiemployer Defined Benefit (2) Money Purchase (see instructions)

1a Enter the valuation date: Month 01 Day 01 Year 2021

b Assets

(1) Current value of assets.....	1b(1)	<u>436712</u>
(2) Actuarial value of assets for funding standard account	1b(2)	<u>434755</u>
c (1) Accrued liability for plan using immediate gain methods	1c(1)	<u>21566656</u>
(2) Information for plans using spread gain methods:		
(a) Unfunded liability for methods with bases	1c(2)(a)	
(b) Accrued liability under entry age normal method	1c(2)(b)	
(c) Normal cost under entry age normal method	1c(2)(c)	
(3) Accrued liability under unit credit cost method	1c(3)	<u>21508380</u>
d Information on current liabilities of the plan:		
(1) Amount excluded from current liability attributable to pre-participation service (see instructions)	1d(1)	
(2) "RPA '94" information:		
(a) Current liability.....	1d(2)(a)	<u>22437988</u>
(b) Expected increase in current liability due to benefits accruing during the plan year.....	1d(2)(b)	<u>182127</u>
(c) Expected release from "RPA '94" current liability for the plan year.....	1d(2)(c)	<u>1277406</u>
(3) Expected plan disbursements for the plan year.....	1d(3)	<u>1277406</u>

Statement by Enrolled Actuary

To the best of my knowledge, the information supplied in this schedule and accompanying schedules, statements and attachments, if any, is complete and accurate. Each prescribed assumption was applied in accordance with applicable law and regulations. In my opinion, each other assumption is reasonable (taking into account the experience of the plan and reasonable expectations) and such other assumptions, in combination, offer my best estimate of anticipated experience under the plan.

SIGN HERE		<u>10/04/2022</u>
	Signature of actuary <u>RONALD C. STOKES</u>	Date <u>20-05287</u>
	Type or print name of actuary <u>RICHARD GABRIEL ASSOCIATES</u>	Most recent enrollment number <u>215-773-0900</u>
	Firm name <u>601 DRESHER ROAD, SUITE 201, HORSHAM, PA 19044-2203</u>	Telephone number (including area code)
	Address of the firm	

If the actuary has not fully reflected any regulation or ruling promulgated under the statute in completing this schedule, check the box and see instructions

For Paperwork Reduction Act Notice, see the Instructions for Form 5500 or 5500-SF.

**Schedule MB (Form 5500) 2021
v. 201209**

2 Operational information as of beginning of this plan year:

a Current value of assets (see instructions)	2a	436712
b "RPA '94" current liability/participant count breakdown:	(1) Number of participants	(2) Current liability
(1) For retired participants and beneficiaries receiving payment	450	14979830
(2) For terminated vested participants	233	6724587
(3) For active participants:		
(a) Non-vested benefits.....		4191
(b) Vested benefits.....		729380
(c) Total active	21	733571
(4) Total	704	22437988
c If the percentage resulting from dividing line 2a by line 2b(4), column (2), is less than 70%, enter such percentage	2c	1.95 %

3 Contributions made to the plan for the plan year by employer(s) and employees:

(a) Date (MM-DD-YYYY)	(b) Amount paid by employer(s)	(c) Amount paid by employees	(a) Date (MM-DD-YYYY)	(b) Amount paid by employer(s)	(c) Amount paid by employees
07/01/2021	36064	0			
			Totals ▶	3(b)	3(c)
				36064	0
(d) Total withdrawal liability amounts included in line 3(b) total					3(d)
					0

4 Information on plan status:

a Funded percentage for monitoring plan's status (line 1b(2) divided by line 1c(3))	4a	2.0 %
b Enter code to indicate plan's status (see instructions for attachment of supporting evidence of plan's status). If entered code is "N," go to line 5	4b	D
c Is the plan making the scheduled progress under any applicable funding improvement or rehabilitation plan?		<input type="checkbox"/> Yes <input type="checkbox"/> No
d If the plan is in critical status or critical and declining status, were any benefits reduced (see instructions)?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
e If line d is "Yes," enter the reduction in liability resulting from the reduction in benefits (see instructions), measured as of the valuation date	4e	
f If the rehabilitation plan projects emergence from critical status or critical and declining status, enter the plan year in which it is projected to emerge. If the rehabilitation plan is based on forestalling possible insolvency, enter the plan year in which insolvency is expected and check here <input checked="" type="checkbox"/>	4f	2021

5 Actuarial cost method used as the basis for this plan year's funding standard account computations (check all that apply):

- a** Attained age normal
- b** Entry age normal
- c** Accrued benefit (unit credit)
- d** Aggregate
- e** Frozen initial liability
- f** Individual level premium
- g** Individual aggregate
- h** Shortfall
- i** Other (specify):

j If box h is checked, enter period of use of shortfall method	5j	
k Has a change been made in funding method for this plan year?.....		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
l If line k is "Yes," was the change made pursuant to Revenue Procedure 2000-40 or other automatic approval?		<input type="checkbox"/> Yes <input type="checkbox"/> No
m If line k is "Yes," and line l is "No," enter the date (MM-DD-YYYY) of the ruling letter (individual or class) approving the change in funding method.....	5m	

6 Checklist of certain actuarial assumptions:

a Interest rate for "RPA '94" current liability.....			6a	2.08 %
b Rates specified in insurance or annuity contracts.....	Pre-retirement		Post-retirement	
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		
c Mortality table code for valuation purposes:				
(1) Males	6c(1)	13-1		13+1
(2) Females	6c(2)	13F-1		13F+1
d Valuation liability interest rate	6d	1.69 %		1.69 %
e Expense loading	6e	589.5 %	<input type="checkbox"/> N/A	0.0 % <input checked="" type="checkbox"/> N/A
f Salary scale.....	6f	%	<input checked="" type="checkbox"/> N/A	
g Estimated investment return on actuarial value of assets for year ending on the valuation date.....	6g			2.0 %
h Estimated investment return on current value of assets for year ending on the valuation date	6h			0.3 %

7 New amortization bases established in the current plan year:

(1) Type of base	(2) Initial balance	(3) Amortization Charge/Credit
1	-907523	-67854
3	-791269	-59162
4	1208662	90370

8 Miscellaneous information:

a If a waiver of a funding deficiency has been approved for this plan year, enter the date (MM-DD-YYYY) of the ruling letter granting the approval.....	8a	
b(1) Is the plan required to provide a projection of expected benefit payments? (See the instructions.) If "Yes," attach a schedule.....		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b(2) Is the plan required to provide a Schedule of Active Participant Data? (See the instructions.) If "Yes," attach a schedule.....		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
c Are any of the plan's amortization bases operating under an extension of time under section 412(e) (as in effect prior to 2008) or section 431(d) of the Code?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
d If line c is "Yes," provide the following additional information:		
(1) Was an extension granted automatic approval under section 431(d)(1) of the Code?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(2) If line 8d(1) is "Yes," enter the number of years by which the amortization period was extended	8d(2)	5
(3) Was an extension approved by the Internal Revenue Service under section 412(e) (as in effect prior to 2008) or 431(d)(2) of the Code?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(4) If line 8d(3) is "Yes," enter number of years by which the amortization period was extended (not including the number of years in line (2)).....	8d(4)	
(5) If line 8d(3) is "Yes," enter the date of the ruling letter approving the extension	8d(5)	
(6) If line 8d(3) is "Yes," is the amortization base eligible for amortization using interest rates applicable under section 6621(b) of the Code for years beginning after 2007?		<input type="checkbox"/> Yes <input type="checkbox"/> No
e If box 5h is checked or line 8c is "Yes," enter the difference between the minimum required contribution for the year and the minimum that would have been required without using the shortfall method or extending the amortization base(s)	8e	-545434

9 Funding standard account statement for this plan year:

Charges to funding standard account:

a Prior year funding deficiency, if any	9a	10815012
b Employer's normal cost for plan year as of valuation date.....	9b	175447
c Amortization charges as of valuation date:	Outstanding balance	
(1) All bases except funding waivers and certain bases for which the amortization period has been extended	9c(1)	13556654
(2) Funding waivers	9c(2)	0
(3) Certain bases for which the amortization period has been extended	9c(3)	0
d Interest as applicable on lines 9a, 9b, and 9c.....	9d	217276
e Total charges. Add lines 9a through 9d.....	9e	13073836

Credits to funding standard account:

f Prior year credit balance, if any.....	9f	0
g Employer contributions. Total from column (b) of line 3.....	9g	36064
	Outstanding balance	
h Amortization credits as of valuation date.....	9h	3239765
i Interest as applicable to end of plan year on lines 9f, 9g, and 9h.....	9i	5431
j Full funding limitation (FFL) and credits:		
(1) ERISA FFL (accrued liability FFL).....	9j(1)	10669657
(2) "RPA '94" override (90% current liability FFL).....	9j(2)	19482413
(3) FFL credit.....	9j(3)	0
k (1) Waived funding deficiency.....	9k(1)	0
(2) Other credits.....	9k(2)	0
l Total credits. Add lines 9f through 9i, 9j(3), 9k(1), and 9k(2).....	9l	344829
m Credit balance: If line 9l is greater than line 9e, enter the difference.....	9m	
n Funding deficiency: If line 9e is greater than line 9l, enter the difference.....	9n	12729007
9o Current year's accumulated reconciliation account:		
(1) Due to waived funding deficiency accumulated prior to the 2021 plan year.....	9o(1)	0
(2) Due to amortization bases extended and amortized using the interest rate under section 6621(b) of the Code:		
(a) Reconciliation outstanding balance as of valuation date.....	9o(2)(a)	0
(b) Reconciliation amount (line 9c(3) balance minus line 9o(2)(a)).....	9o(2)(b)	0
(3) Total as of valuation date.....	9o(3)	0
10 Contribution necessary to avoid an accumulated funding deficiency. (See instructions.).....	10	12729007
11 Has a change been made in the actuarial assumptions for the current plan year? If "Yes," see instructions.....		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

SCHEDULE C (Form 5500) <small>Department of the Treasury Internal Revenue Service</small> <small>Department of Labor Employee Benefits Security Administration</small> <small>Pension Benefit Guaranty Corporation</small>	Service Provider Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA). ▶ File as an attachment to Form 5500.	<small>OMB No. 1210-0110</small> 2021 This Form is Open to Public Inspection.
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For calendar plan year 2021 or fiscal plan year beginning **01/01/2021** and ending **12/31/2021**

A Name of plan BINDERY INDUSTRY EMPLOYERS GCC / IBT PENSION PLAN	B Three-digit plan number (PN) ▶	001
C Plan sponsor's name as shown on line 2a of Form 5500 BOT-BIE GCC / IBT PENSION PLAN	D Employer Identification Number (EIN) 23-6209755	

Part I Service Provider Information (see instructions)

You must complete this Part, in accordance with the instructions, to report the information required for **each person** who received, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of monetary value) in connection with services rendered to the plan or the person's position with the plan during the plan year. If a person received **only** eligible indirect compensation for which the plan received the required disclosures, you are required to answer line 1 but are not required to include that person when completing the remainder of this Part.

1 Information on Persons Receiving Only Eligible Indirect Compensation

a Check "Yes" or "No" to indicate whether you are excluding a person from the remainder of this Part because they received only eligible indirect compensation for which the plan received the required disclosures (see instructions for definitions and conditions)..... Yes No

b If you answered line 1a "Yes," enter the name and EIN or address of each person providing the required disclosures for the service providers who received only eligible indirect compensation. Complete as many entries as needed (see instructions).

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

FIRST AMERICAN FUNDS **P.O. BOX 701**
MILWAUKEE, WI 53201

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

PGIM INVESTMENTS **C/O PRUDENTIAL MUTUAL FUND SERVICES**
PO BOX 9658
PROVIDENCE, RI 02940

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

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2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

RICHARD GABRIEL ASSOCIATES

23-2817579

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
11 13 17 38 50	NONE	49980	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>		Yes <input type="checkbox"/> No <input type="checkbox"/>

(a) Enter name and EIN or address (see instructions)

MARKOWITZ & RICHMAN

23-2111581

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
29 50	NONE	35770	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>		Yes <input type="checkbox"/> No <input type="checkbox"/>

(a) Enter name and EIN or address (see instructions)

FISCHER DORWART, P.C.

23-2247478

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
10 50	NONE	12500	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>		Yes <input type="checkbox"/> No <input type="checkbox"/>

2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

US BANK, N.A.

31-0841368

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
15 18 19 50	NONE	9143	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	0	Yes <input type="checkbox"/> No <input type="checkbox"/>

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>		Yes <input type="checkbox"/> No <input type="checkbox"/>

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>		Yes <input type="checkbox"/> No <input type="checkbox"/>

Part I Service Provider Information (continued)

3. If you reported on line 2 receipt of indirect compensation, other than eligible indirect compensation, by a service provider, and the service provider is a fiduciary or provides contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services, answer the following questions for (a) each source from whom the service provider received \$1,000 or more in indirect compensation and (b) each source for whom the service provider gave you a formula used to determine the indirect compensation instead of an amount or estimated amount of the indirect compensation. Complete as many entries as needed to report the required information for each source.

(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	
(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	
(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.	

Part II Service Providers Who Fail or Refuse to Provide Information

4 Provide, to the extent possible, the following information for each service provider who failed or refused to provide the information necessary to complete this Schedule.

(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide

(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide

Part III	Termination Information on Accountants and Enrolled Actuaries (see instructions) (complete as many entries as needed)
-----------------	---

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

**SCHEDULE H
(Form 5500)**

Department of the Treasury
Internal Revenue Service

Department of Labor
Employee Benefits Security Administration

Pension Benefit Guaranty Corporation

Financial Information

This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA), and section 6058(a) of the Internal Revenue Code (the Code).

▶ **File as an attachment to Form 5500.**

OMB No. 1210-0110

2021

This Form is Open to Public Inspection

For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021

A Name of plan <u>BINDERY INDUSTRY EMPLOYERS GCC / IBT PENSION PLAN</u>		B Three-digit plan number (PN) ▶	<u>001</u>
C Plan sponsor's name as shown on line 2a of Form 5500 <u>BOT-BIE GCC / IBT PENSION PLAN</u>		D Employer Identification Number (EIN) <u>23-6209755</u>	

Part I Asset and Liability Statement

1 Current value of plan assets and liabilities at the beginning and end of the plan year. Combine the value of plan assets held in more than one trust. Report the value of the plan's interest in a commingled fund containing the assets of more than one plan on a line-by-line basis unless the value is reportable on lines 1c(9) through 1c(14). Do not enter the value of that portion of an insurance contract which guarantees, during this plan year, to pay a specific dollar benefit at a future date. **Round off amounts to the nearest dollar.** MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 1b(1), 1b(2), 1c(8), 1g, 1h, and 1i. CCTs, PSAs, and 103-12 IEs also do not complete lines 1d and 1e. See instructions.

Assets		(a) Beginning of Year	(b) End of Year
a Total noninterest-bearing cash.....	1a		
b Receivables (less allowance for doubtful accounts):			
(1) Employer contributions	1b(1)	3137	3065
(2) Participant contributions.....	1b(2)		
(3) Other	1b(3)	796	1067
c General investments:			
(1) Interest-bearing cash (include money market accounts & certificates of deposit)	1c(1)	468966	456763
(2) U.S. Government securities	1c(2)		
(3) Corporate debt instruments (other than employer securities):			
(A) Preferred	1c(3)(A)		
(B) All other	1c(3)(B)		
(4) Corporate stocks (other than employer securities):			
(A) Preferred	1c(4)(A)		
(B) Common	1c(4)(B)		
(5) Partnership/joint venture interests	1c(5)		
(6) Real estate (other than employer real property)	1c(6)		
(7) Loans (other than to participants)	1c(7)		
(8) Participant loans	1c(8)		
(9) Value of interest in common/collective trusts	1c(9)		
(10) Value of interest in pooled separate accounts	1c(10)		
(11) Value of interest in master trust investment accounts	1c(11)		
(12) Value of interest in 103-12 investment entities	1c(12)		
(13) Value of interest in registered investment companies (e.g., mutual funds)	1c(13)	36	35
(14) Value of funds held in insurance company general account (unallocated contracts).....	1c(14)		
(15) Other.....	1c(15)		

		(a) Beginning of Year	(b) End of Year
1d	Employer-related investments:		
(1)	Employer securities.....	1d(1)	
(2)	Employer real property.....	1d(2)	
e	Buildings and other property used in plan operation.....	1e	
f	Total assets (add all amounts in lines 1a through 1e).....	1f	472935 460930
Liabilities			
g	Benefit claims payable.....	1g	
h	Operating payables.....	1h	36223 22302
i	Acquisition indebtedness.....	1i	
j	Other liabilities.....	1j	
k	Total liabilities (add all amounts in lines 1g through 1j).....	1k	36223 22302
Net Assets			
l	Net assets (subtract line 1k from line 1f).....	1l	436712 438628

Part II Income and Expense Statement

2 Plan income, expenses, and changes in net assets for the year. Include all income and expenses of the plan, including any trust(s) or separately maintained fund(s) and any payments/receipts to/from insurance carriers. Round off amounts to the nearest dollar. MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 2a, 2b(1)(E), 2e, 2f, and 2g.

		(a) Amount	(b) Total
Income			
a	Contributions:		
(1)	Received or receivable in cash from: (A) Employers.....	2a(1)(A)	36064
	(B) Participants.....	2a(1)(B)	
	(C) Others (including rollovers).....	2a(1)(C)	
(2)	Noncash contributions.....	2a(2)	
(3)	Total contributions. Add lines 2a(1)(A) , (B) , (C) , and line 2a(2)	2a(3)	36064
b	Earnings on investments:		
(1)	Interest:		
	(A) Interest-bearing cash (including money market accounts and certificates of deposit).....	2b(1)(A)	61
	(B) U.S. Government securities.....	2b(1)(B)	
	(C) Corporate debt instruments.....	2b(1)(C)	
	(D) Loans (other than to participants).....	2b(1)(D)	
	(E) Participant loans.....	2b(1)(E)	
	(F) Other.....	2b(1)(F)	
	(G) Total interest. Add lines 2b(1)(A) through (F)	2b(1)(G)	61
(2)	Dividends: (A) Preferred stock.....	2b(2)(A)	
	(B) Common stock.....	2b(2)(B)	
	(C) Registered investment company shares (e.g. mutual funds).....	2b(2)(C)	1
	(D) Total dividends. Add lines 2b(2)(A) , (B) , and (C)	2b(2)(D)	1
(3)	Rents.....	2b(3)	
(4)	Net gain (loss) on sale of assets: (A) Aggregate proceeds.....	2b(4)(A)	25
	(B) Aggregate carrying amount (see instructions).....	2b(4)(B)	0
	(C) Subtract line 2b(4)(B) from line 2b(4)(A) and enter result.....	2b(4)(C)	25
(5)	Unrealized appreciation (depreciation) of assets: (A) Real estate.....	2b(5)(A)	
	(B) Other.....	2b(5)(B)	
	(C) Total unrealized appreciation of assets. Add lines 2b(5)(A) and (B)	2b(5)(C)	0

		(a) Amount	(b) Total
(6) Net investment gain (loss) from common/collective trusts.....	2b(6)		
(7) Net investment gain (loss) from pooled separate accounts.....	2b(7)		
(8) Net investment gain (loss) from master trust investment accounts.....	2b(8)		
(9) Net investment gain (loss) from 103-12 investment entities.....	2b(9)		
(10) Net investment gain (loss) from registered investment companies (e.g., mutual funds).....	2b(10)		-2
c Other income.....	2c		1372000
d Total income. Add all income amounts in column (b) and enter total.....	2d		1408149
Expenses			
e Benefit payment and payments to provide benefits:			
(1) Directly to participants or beneficiaries, including direct rollovers.....	2e(1)	1288240	
(2) To insurance carriers for the provision of benefits.....	2e(2)		
(3) Other.....	2e(3)		
(4) Total benefit payments. Add lines 2e(1) through (3).....	2e(4)		1288240
f Corrective distributions (see instructions).....	2f		
g Certain deemed distributions of participant loans (see instructions).....	2g		
h Interest expense.....	2h		
i Administrative expenses: (1) Professional fees.....	2i(1)	58750	
(2) Contract administrator fees.....	2i(2)	39500	
(3) Investment advisory and management fees.....	2i(3)		
(4) Other.....	2i(4)	19743	
(5) Total administrative expenses. Add lines 2i(1) through (4).....	2i(5)		117993
j Total expenses. Add all expense amounts in column (b) and enter total.....	2j		1406233
Net Income and Reconciliation			
k Net income (loss). Subtract line 2j from line 2d.....	2k		1916
l Transfers of assets:			
(1) To this plan.....	2l(1)		
(2) From this plan.....	2l(2)		

Part III Accountant's Opinion

3 Complete lines 3a through 3c if the opinion of an independent qualified public accountant is attached to this Form 5500. Complete line 3d if an opinion is not attached.

a The attached opinion of an independent qualified public accountant for this plan is (see instructions):

- (1) Unmodified (2) Qualified (3) Disclaimer (4) Adverse

b Check the appropriate box(es) to indicate whether the IQPA performed an ERISA section 103(a)(3)(C) audit. Check both boxes (1) and (2) if the audit was performed pursuant to both 29 CFR 2520.103-8 and 29 CFR 2520.103-12(d). Check box (3) if pursuant to neither.

- (1) DOL Regulation 2520.103-8 (2) DOL Regulation 2520.103-12(d) (3) neither DOL Regulation 2520.103-8 nor DOL Regulation 2520.103-12(d).

c Enter the name and EIN of the accountant (or accounting firm) below:

(1) Name: FISCHER DORWART, PC

(2) EIN: 23-2247478

d The opinion of an independent qualified public accountant is **not attached** because:

- (1) This form is filed for a CCT, PSA, or MTIA. (2) It will be attached to the next Form 5500 pursuant to 29 CFR 2520.104-50.

Part IV Compliance Questions

4 CCTs and PSAs do not complete Part IV. MTIAs, 103-12 IEs, and GIAs do not complete lines 4a, 4e, 4f, 4g, 4h, 4k, 4m, 4n, or 5. 103-12 IEs also do not complete lines 4j and 4l. MTIAs also do not complete line 4l.

During the plan year:

a Was there a failure to transmit to the plan any participant contributions within the time period described in 29 CFR 2510.3-102? Continue to answer "Yes" for any prior year failures until fully corrected. (See instructions and DOL's Voluntary Fiduciary Correction Program.).....

	Yes	No	Amount
4a		X	

		Yes	No		Amount
b Were any loans by the plan or fixed income obligations due the plan in default as of the close of the plan year or classified during the year as uncollectible? Disregard participant loans secured by participant's account balance. (Attach Schedule G (Form 5500) Part I if "Yes" is checked.)	4b		X		
c Were any leases to which the plan was a party in default or classified during the year as uncollectible? (Attach Schedule G (Form 5500) Part II if "Yes" is checked.)	4c		X		
d Were there any nonexempt transactions with any party-in-interest? (Do not include transactions reported on line 4a. Attach Schedule G (Form 5500) Part III if "Yes" is checked.)	4d		X		
e Was this plan covered by a fidelity bond?	4e	X			750000
f Did the plan have a loss, whether or not reimbursed by the plan's fidelity bond, that was caused by fraud or dishonesty?	4f		X		
g Did the plan hold any assets whose current value was neither readily determinable on an established market nor set by an independent third party appraiser?	4g		X		
h Did the plan receive any noncash contributions whose value was neither readily determinable on an established market nor set by an independent third party appraiser?	4h		X		
i Did the plan have assets held for investment? (Attach schedule(s) of assets if "Yes" is checked, and see instructions for format requirements.).....	4i	X			
j Were any plan transactions or series of transactions in excess of 5% of the current value of plan assets? (Attach schedule of transactions if "Yes" is checked and see instructions for format requirements.).....	4j	X			
k Were all the plan assets either distributed to participants or beneficiaries, transferred to another plan, or brought under the control of the PBGC?	4k		X		
l Has the plan failed to provide any benefit when due under the plan?	4l		X		
m If this is an individual account plan, was there a blackout period? (See instructions and 29 CFR 2520.101-3.).....	4m				
n If 4m was answered "Yes," check the "Yes" box if you either provided the required notice or one of the exceptions to providing the notice applied under 29 CFR 2520.101-3.....	4n				

5a Has a resolution to terminate the plan been adopted during the plan year or any prior plan year?..... Yes No
 If "Yes," enter the amount of any plan assets that reverted to the employer this year _____.

5b If, during this plan year, any assets or liabilities were transferred from this plan to another plan(s), identify the plan(s) to which assets or liabilities were transferred. (See instructions.)

5b(1) Name of plan(s)	5b(2) EIN(s)	5b(3) PN(s)

5c Was the plan a defined benefit plan covered under the PBGC insurance program at any time during this plan year? (See ERISA section 4021 and instructions.) Yes No Not determined
 If "Yes" is checked, enter the My PAA confirmation number from the PBGC premium filing for this plan year 449408.

SCHEDULE R (Form 5500) <small>Department of the Treasury Internal Revenue Service</small> <small>Department of Labor Employee Benefits Security Administration</small> <small>Pension Benefit Guaranty Corporation</small>	Retirement Plan Information This schedule is required to be filed under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and section 6058(a) of the Internal Revenue Code (the Code). ▶ File as an attachment to Form 5500.	<small>OMB No. 1210-0110</small> 2021 This Form is Open to Public Inspection.
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For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021

A Name of plan <u>BINDERY INDUSTRY EMPLOYERS GCC / IBT PENSION PLAN</u>	B Three-digit plan number (PN) ▶	<u>001</u>
C Plan sponsor's name as shown on line 2a of Form 5500 <u>BOT-BIE GCC / IBT PENSION PLAN</u>	D Employer Identification Number (EIN) <u>23-6209755</u>	

Part I	Distributions
---------------	----------------------

All references to distributions relate only to payments of benefits during the plan year.

1 Total value of distributions paid in property other than in cash or the forms of property specified in the instructions.....	1	<u>0</u>
2 Enter the EIN(s) of payor(s) who paid benefits on behalf of the plan to participants or beneficiaries during the year (if more than two, enter EINs of the two payors who paid the greatest dollar amounts of benefits): EIN(s): <u>41-6271370</u>		
Profit-sharing plans, ESOPs, and stock bonus plans, skip line 3.		
3 Number of participants (living or deceased) whose benefits were distributed in a single sum, during the plan year	3	<u>0</u>

Part II	Funding Information (If the plan is not subject to the minimum funding requirements of section 412 of the Internal Revenue Code or ERISA section 302, skip this Part.)
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4 Is the plan administrator making an election under Code section 412(d)(2) or ERISA section 302(d)(2)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
If the plan is a defined benefit plan, go to line 8.			
5 If a waiver of the minimum funding standard for a prior year is being amortized in this plan year, see instructions and enter the date of the ruling letter granting the waiver. Date: Month _____ Day _____ Year _____ If you completed line 5, complete lines 3, 9, and 10 of Schedule MB and do not complete the remainder of this schedule.			
6 a Enter the minimum required contribution for this plan year (include any prior year accumulated funding deficiency not waived)	6a		
b Enter the amount contributed by the employer to the plan for this plan year	6b		
c Subtract the amount in line 6b from the amount in line 6a. Enter the result (enter a minus sign to the left of a negative amount)	6c		
If you completed line 6c, skip lines 8 and 9.			
7 Will the minimum funding amount reported on line 6c be met by the funding deadline?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
8 If a change in actuarial cost method was made for this plan year pursuant to a revenue procedure or other authority providing automatic approval for the change or a class ruling letter, does the plan sponsor or plan administrator agree with the change?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A

Part III	Amendments
-----------------	-------------------

9 If this is a defined benefit pension plan, were any amendments adopted during this plan year that increased or decreased the value of benefits? If yes, check the appropriate box. If no, check the "No" box.....	<input type="checkbox"/> Increase	<input type="checkbox"/> Decrease	<input type="checkbox"/> Both	<input checked="" type="checkbox"/> No
--	-----------------------------------	-----------------------------------	-------------------------------	--

Part IV	ESOPs (see instructions). If this is not a plan described under section 409(a) or 4975(e)(7) of the Internal Revenue Code, skip this Part.
----------------	---

10 Were unallocated employer securities or proceeds from the sale of unallocated securities used to repay any exempt loan?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
11 a Does the ESOP hold any preferred stock?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b If the ESOP has an outstanding exempt loan with the employer as lender, is such loan part of a "back-to-back" loan? (See instructions for definition of "back-to-back" loan.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
12 Does the ESOP hold any stock that is not readily tradable on an established securities market?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Part V Additional Information for Multiemployer Defined Benefit Pension Plans

13 Enter the following information for each employer that contributed more than 5% of total contributions to the plan during the plan year (measured in dollars). See instructions. Complete as many entries as needed to report all applicable employers.

a Name of contributing employer SMITH EDWARDS DUNLAP COMPANY

b EIN 23-0539350 **c** Dollar amount contributed by employer 36064

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month 03 Day 04 Year 2023

e Contribution rate information (If more than one rate applies, check this box and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) 6.55

(2) Base unit measure: Hourly Weekly Unit of production Other (specify): PER SHIFT

a Name of contributing employer _____

b EIN _____ **c** Dollar amount contributed by employer _____

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: Hourly Weekly Unit of production Other (specify): _____

a Name of contributing employer _____

b EIN _____ **c** Dollar amount contributed by employer _____

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: Hourly Weekly Unit of production Other (specify): _____

a Name of contributing employer _____

b EIN _____ **c** Dollar amount contributed by employer _____

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: Hourly Weekly Unit of production Other (specify): _____

a Name of contributing employer _____

b EIN _____ **c** Dollar amount contributed by employer _____

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: Hourly Weekly Unit of production Other (specify): _____

a Name of contributing employer _____

b EIN _____ **c** Dollar amount contributed by employer _____

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: Hourly Weekly Unit of production Other (specify): _____

14 Enter the number of deferred vested and retired participants (inactive participants), as of the beginning of the plan year, whose contributing employer is no longer making contributions to the plan for:

a The current plan year. Check the box to indicate the counting method used to determine the number of inactive participants: <input checked="" type="checkbox"/> last contributing employer <input type="checkbox"/> alternative <input type="checkbox"/> reasonable approximation (see instructions for required attachment).....	14a	636
b The plan year immediately preceding the current plan year. <input type="checkbox"/> Check the box if the number reported is a change from what was previously reported (see instructions for required attachment).....	14b	656
c The second preceding plan year. <input type="checkbox"/> Check the box if the number reported is a change from what was previously reported (see instructions for required attachment).....	14c	383

15 Enter the ratio of the number of participants under the plan on whose behalf no employer had an obligation to make an employer contribution during the current plan year to:

a The corresponding number for the plan year immediately preceding the current plan year.....	15a	0.99
b The corresponding number for the second preceding plan year.....	15b	1.10

16 Information with respect to any employers who withdrew from the plan during the preceding plan year:

a Enter the number of employers who withdrew during the preceding plan year.....	16a	
b If line 16a is greater than 0, enter the aggregate amount of withdrawal liability assessed or estimated to be assessed against such withdrawn employers.....	16b	

17 If assets and liabilities from another plan have been transferred to or merged with this plan during the plan year, check box and see instructions regarding supplemental information to be included as an attachment.....

Part VI Additional Information for Single-Employer and Multiemployer Defined Benefit Pension Plans

18 If any liabilities to participants or their beneficiaries under the plan as of the end of the plan year consist (in whole or in part) of liabilities to such participants and beneficiaries under two or more pension plans as of immediately before such plan year, check box and see instructions regarding supplemental information to be included as an attachment.....

19 If the total number of participants is 1,000 or more, complete lines (a) through (c)

a Enter the percentage of plan assets held as:
 Stock: _____% Investment-Grade Debt: _____% High-Yield Debt: _____% Real Estate: _____% Other: _____%

b Provide the average duration of the combined investment-grade and high-yield debt:
 0-3 years 3-6 years 6-9 years 9-12 years 12-15 years 15-18 years 18-21 years 21 years or more

c What duration measure was used to calculate line 19(b)?
 Effective duration Macaulay duration Modified duration Other (specify): _____

20 PBGC missed contribution reporting requirements. If this is a multiemployer plan or a single-employer plan that is not covered by PBGC, skip line 20.

a Is the amount of unpaid minimum required contributions for all years from Schedule SB (Form 5500) line 40 greater than zero? Yes No

b If line 20a is "Yes," has PBGC been notified as required by ERISA sections 4043(c)(5) and/or 303(k)(4)? Check the applicable box:
 Yes.
 No. Reporting was waived under 29 CFR 4043.25(c)(2) because contributions equal to or exceeding the unpaid minimum required contribution were made by the 30th day after the due date.
 No. The 30-day period referenced in 29 CFR 4043.25(c)(2) has not yet ended, and the sponsor intends to make a contribution equal to or exceeding the unpaid minimum required contribution by the 30th day after the due date.
 No. Other. Provide explanation _____

BINDERY INDUSTRY
EMPLOYERS GCC/IBT
PENSION FUND

Financial Statements
Supplemental Schedules
and
Independent Auditor's Report
For the Years December 31, 2021 and 2020

* * * * *

BINDERY INDUSTRY EMPLOYERS GCC/IBT

PENSION FUND

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INDEPENDENT AUDITOR'S REPORT

To the Board of Trustees
Bindery Industry Employers GCC/IBT
Pension Fund
Horsham, Pennsylvania

Opinion

We have audited the accompanying financial statements of Bindery Industry Employers GCC/IBT Pension Fund, an employee benefit plan subject to the Employee Retirement Income Security Act of 1974 (ERISA), which comprise the statements of net assets available for benefits as of December 31, 2021 and 2020, and the related statement of changes in net assets available for benefits for the years then ended, and the related notes to the financial statements.

In our opinion, the financial statements referred to above present fairly, in all material respects, the net assets available for benefits of Bindery Industry Employers GCC/IBT Pension Fund as of December 31, 2021 and 2020, and the changes in its net assets available for benefits for the years then ended, in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the plan and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the plan's ability to continue as a going concern within one year after the date that the financial statements are available to be issued.

Management is also responsible for maintaining a current plan instrument, including all plan amendments; administering the plan; and determining that the plan's transactions that are presented and disclosed in the financial statements are in conformity with the plan's provisions, including maintaining sufficient records with respect to each of the participants, to determine the benefits due or which may become due to such participants.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements, including omissions, are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the plan's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the plan's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.

Supplemental Schedules

Our audits were conducted for the purpose of forming an opinion on the financial statements as a whole. The supplemental schedule of administrative expenses is presented for purposes of additional analysis and is not a required part of the financial statements. The supplemental schedule of assets held at end of year and reportable transactions are presented for the purpose of additional analysis and are not a required part of the basic financial statements but is supplementary information required by the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974. Such information is the responsibility of the plan's management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with generally accepted auditing standards.

In forming our opinion on the supplemental schedules, we evaluated whether the supplemental schedules, including their form and content, are presented in conformity with the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA.

In our opinion, the information in the accompanying schedules is fairly stated, in all material respects, in relation to the financial statements as a whole, and the form and content are presented in conformity with the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA.


Fischer Dorwart, P.C.

October 14, 2022

**BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
STATEMENT OF NET ASSETS AVAILABLE FOR BENEFITS
DECEMBER 31, 2021 AND 2020**

	2021	2020
<i>Assets:</i>		
Investments at Fair Value		
Mutual Funds	\$ 35	\$ 36
Cash and Equivalents	456,763	468,966
Total Investments at Fair Value	<u>456,798</u>	<u>469,002</u>
Receivables:		
Accrued Income	3	4
Employer Contributions	3,065	3,137
Total Receivables	<u>3,068</u>	<u>3,141</u>
Other Asset:		
Prepaid Expenses	1,064	792
Total Assets	<u>460,930</u>	<u>472,935</u>
<i>Liabilities:</i>		
Accrued Expenses	22,302	36,223
Total Liabilities	<u>22,302</u>	<u>36,223</u>
Net Assets Available for Benefits	<u>\$ 438,628</u>	<u>\$ 436,712</u>

The Accompanying Notes are an Integral
Part of the Financial Statements

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS
FOR THE YEARS DECEMBER 31, 2021 AND 2020

	2021	2020
Additions to Net Assets Attributed to:		
Investment Income:		
Net Appreciation in Fair Value of Investments	\$ 23	\$ 301
Interest & Dividends	62	944
Totals	85	1,245
Less: Investment Advisory Fees	-	-
Net Investment Income	85	1,245
Employer Contributions	36,064	40,756
Pension Benefit Guaranty Corporation Funding	1,372,000	1,416,200
Total Additions	1,408,149	1,458,201
Deductions from Net Assets Attributed to:		
Benefits Paid Directly to Participants	1,288,240	1,290,005
Administrative Expenses	117,993	168,414
Total Deductions	1,406,233	1,458,419
Net Change in Net Assets Available for Benefits	1,916	(218)
Net Assets Available for Benefits:		
Beginning of Year	436,712	436,930
End of Year	\$ 438,628	\$ 436,712

The Accompanying Notes are an Integral
Part of the Financial Statements

BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND

NOTES TO FINANCIAL STATEMENTS

1. DESCRIPTION OF THE PLAN

The following brief description of the Bindery Industry Employers GCC/IBT Pension Plan (Plan) is provided for general information purposes only. Participants should refer to the Plan agreement for more complete information.

General

The Plan is a multiemployer defined benefit pension plan covering all eligible members of the Graphic Communications Conference of the International Brotherhood of Teamsters Union Local 14-M and the former Graphic Communications Conference of the International Brotherhood of Teamsters Union Local 4-C pursuant to various collective bargaining agreements. The Plan sponsor and Plan administrator is the Bindery Industry Employers GCC/IBT Pension Plan Board of Trustees. The Board of Trustees is composed of two trustees, one designated by the employers and one designated by the Union as their representatives in accordance with the Agreement and Declaration of Trust. The Board of Trustees has overall responsibility for the operation and administration of the Plan. The Plan is subject to the provisions of the Employee Retirement Income Security Act of 1974 (ERISA). Participation normally begins after the completion of one year of service.

Vesting

Effective January 1, 1999, the following vesting schedule applies to any participant who completes an hour of service on or after January 1, 1999: less than 5 years of service, 0%; 5 or more years of service, 100%. A participant in the Plan whose termination of employment date is prior to January 1, 1999 is subject to the vesting schedule in effect as of the date of termination of employment.

Pension Benefits

If a participant's last day of covered employment is on or after January 1, 2001, his accrued monthly pension is equal to his credited service as of such date multiplied by \$14.00. If a participant's last day of covered employment is prior to January 1, 2001, his accrued monthly pension is equal to his credited service as of such date multiplied by the benefit rate(s) in effect on such date. For retirements on or after January 1, 2011, pension benefits are payable monthly in the normal form of a life annuity for single participants. Participants who are married at retirement will receive reduced benefits in a joint and 50% survivor annuity form unless another option is elected. A participant's normal retirement age is the later of the date on which he attains age 65, or the fifth anniversary of the date participation commenced. A terminated participant who is eligible for a deferred vested monthly pension is eligible for early retirement after attaining age 55. The early retirement benefit is the normal monthly benefit accrued as of the early retirement date reduced by 0.5% for each month that the early retirement date precedes the normal retirement date.

Pre-Retirement Death Benefits

Pre-Retirement Death Benefits are provided to eligible active or terminated vested participants who have completed 5 years of Vesting Service. For married participants, the benefit is in the form of a Qualified Pre-Retirement Survivor Annuity. If eligible for early retirement at death, the eligible spouse will receive a monthly benefit equal to 50% of the normal retirement pension

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

DESCRIPTION OF THE PLAN (Continued)

Pre-Retirement Death Benefits (Continued)

computed as of the date of death, reduced for early commencement as if the participant had retired the day before his death and further reduced as if the participant had elected the joint and 50% survivor annuity option. If younger than early retirement age at death, the benefit will be determined as of the date of death but reduced as if he had retired at the earliest retirement age. This benefit begins on the first day of the month following the later of the participant's death or the month the participant would have attained early retirement age and continues for the surviving spouse's lifetime. For non-married participants who die prior to April 1, 2020 with 5 years of contributory service, the death benefit is a lump sum benefit based on a formula that incorporates the actual years of employer contributions to the Plan for such participant. The maximum single sum payable is \$5,512.50, subject to any restrictions under Code Section 432(f)(2).

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting

The accompanying financial statements are prepared on the accrual basis of accounting.

Investment Valuation and Income Recognition

The Plan's investments are stated at fair value. Purchase and sales of securities are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date. Net appreciation (depreciation) in value includes the Plan's realized gains and losses on investments bought and sold as well as held during the year.

Employer Receivables

Contributions due and not paid prior to the year end are recorded as contributions receivable. Allowance for uncollectible accounts is considered unnecessary and is not provided.

Funding Policy

The Plan benefits are funded by contributions from the participating employers pursuant to the applicable collective bargaining agreements. No employee contributions are required.

Financial assistance amounts received from the PBGC are recorded as income when received.

Actuarial Present Value of Accumulated Plan Benefits

Accumulated plan benefits are those future periodic payments, including lump-sum distributions, that are attributable under the Plan's provisions to the service which employees have rendered. Accumulated plan benefits include benefits expected to be paid to (a) retired or terminated employees or their beneficiaries, (b) beneficiaries of employees who have died, and (c) present employees or their beneficiaries.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

Risks and Uncertainties

The Plan utilizes various investment instruments which are exposed to various risks, such as interest rate, credit, and overall market volatility. Due to the level of risk associated with certain investment securities, it is reasonably possible that changes in the values of investment securities will occur in the near term and that such changes could materially affect the amounts reported in the financial statement. The Plan's investments are not insured or protected by the Plan's Trustee, the Pension Benefit Guaranty Corporation, or any other governmental agency; accordingly, the Plan is subject to the normal investment risks associated with money market funds, mutual funds, stocks, bonds, and other similar types of investments.

Subsequent Events

Management has evaluated events and transactions occurring subsequent to December 31, 2021 for items that should potentially be recognized or disclosed in these financial statements. The evaluation was conducted through October 14, 2022, the date these financial statements were available for issue.

3. PRIORITIES UPON TERMINATION

It is the intent of the Trustees to continue the Plan in full force and effect; however, the right to discontinue the Plan is reserved to the Trustees. Termination shall not permit any part of the Plan assets to be used for or diverted to purposes other than the exclusive benefit of the pensioners, beneficiaries, and participants. In the event of termination, the net assets of the Plan will be allocated to pay benefits in priorities as prescribed by ERISA and its related regulations.

Whether or not a particular participant will receive full benefits should the Plan terminate at some future time will depend on the sufficiency of the Plan's net assets at that time and the priority of those benefits.

In addition, certain benefits under the Plan are insured by the PBGC if the Plan terminates. Generally, the PBGC guarantees most vested normal age retirement benefits, early retirement benefits, and certain disability and survivor's pensions. However, the PBGC does not guarantee all types of benefits under the Plan, and the amount of benefit protection is subject to certain limitations. Vested benefits under the Plan are guaranteed at the level in effect on the date of the Plan's termination, subject to a statutory ceiling or the amount of an individual's monthly benefit. Therefore, a participant may receive less than 100% of his vested benefit should the Plan terminate and be subject to the PBGC guarantee.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

4. TAX STATUS

The Plan obtained its latest determination letter on August 17, 2015, in which the Internal Revenue Service stated that the Plan, as then designed, was in compliance with the applicable requirements under Section 401(a) of the Internal Revenue Code and was, therefore, exempt from federal income taxes under the provisions of Section 501(a). The Plan's administrator and the Plan's tax counsel believe that the Plan is currently designed and being operated in compliance with the applicable requirements of the Internal Revenue Code.

Accounting principles generally accepted in the United States of America require Plan management to evaluate tax positions taken by the Plan and recognize a tax liability if the Plan has taken an uncertain position that more likely than not would not be sustained upon examination by the Internal Revenue Service. The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax periods in progress.

5. FAIR VALUE MEASUREMENTS

ASC 820, *Fair Value Measurements and Disclosures*, establishes a framework for measuring fair value. The framework provides a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets (Level 1) and the lowest priority to unobservable inputs (Level 3). The Plan uses appropriate valuation techniques based on the available inputs to measure the fair value of its investments. When available, the Plan measures fair value using Level 1 inputs because they generally provide the most reliable evidence of fair value. Level 3 inputs were used only when Level 1 or Level 2 inputs were not available. An asset's level within the fair value hierarchy is based on the lowest level of input that is significant to the fair value measurement.

The three levels of the fair value hierarchy under ASC 820 are as follows:

- Level 1: Unadjusted quoted prices in active markets that are accessible at the measurement date for identical unrestricted assets.
- Level 2: Quoted prices in markets that are not active, or inputs that are observable either directly or indirectly, for substantially the full term of the asset.
- Level 3: Prices or valuation techniques that require inputs that are both significant to the fair value measurement and unobservable (i.e. supported with little or no market activity).

Following is a description of the valuation methodologies used for assets measured at fair value. There have been no changes in the methodologies used at December 31, 2021 and 2020:

Mutual funds are valued at the quoted net asset value ("NAV") of shares held by the Plan at year end.

Short-term investments, except for non-interest-bearing cash, are valued at their carrying value which approximates fair value based on their short-term maturity.

Investment securities measured at fair value on a recurring basis for which the plan has elected the fair value option, are summarized below as of December 31, 2021 and 2020:

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

5. FAIR VALUE MEASUREMENTS (Continued)

	<u>Fair Value Measurements at Reporting Date Using:</u>			
	Quoted Prices In Active Markets For Identical Assets (Level 1)	Significant Order Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)	Total Fair Value
<u>December 31, 2021</u>				
Mutual Funds	\$ 35	\$ -	\$ -	\$ 35
Cash and Equivalents	456,763	-	-	456,763
Total investments at fair value	<u>\$ 456,798</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 456,798</u>
 <u>December 31, 2020</u>				
Mutual Funds	\$ 36	\$ -	\$ -	\$ 36
Cash and Equivalents	468,966	-	-	468,966
Total investments at fair value	<u>\$ 469,002</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 469,002</u>

Gains and losses (realized and unrealized) included in changes in net assets available for benefits for the years ended December 31, 2021 and 2020, are included in net appreciation in fair value of investments.

6. ACTUARIAL INFORMATION

Accumulated plan benefits are those future periodic payments, including lump sum distributions that are attributable under the Plan's provisions to the service employees have rendered. Accumulated plan benefits include benefits expected to be paid to (a) retired or terminated employees or their beneficiaries, (b) beneficiaries of employees who have died, and (c) present employees or their beneficiaries. Benefits payable are included to the extent they are deemed attributable to employee service rendered to the valuation date. The actuarial present value of the accumulated plan benefits is determined by an independent actuary and is that amount that results from applying actuarial assumptions to adjust the accumulated plan benefits to reflect the time value of money (through discounts for interest) and the probability of payment (by means of decrements such as for death, disability, withdrawal, or retirement) between the valuation date and expected date of payment.

The computations of the actuarial present value of accumulated plan benefits as presented in these notes were made as of January 1, 2021. Had the valuation been performed as of December 31, 2020, there would be no material difference.

The following actuarial assumptions are based on the presumption that the Plan will continue. Were the Plan to terminate, different actuarial assumptions and other factors might be applicable in determining the actuarial present value of accumulated plan benefits.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

6. ACTUARIAL INFORMATION (Continued)

The significant actuarial assumptions used in the valuation as of January 1, 2021 (presented below as of December 31, 2020) were: (a) Pre-retirement mortality: RPH-2014 Blue Collar Employee Mortality Table with a one-year setback, (b) Post-retirement (not disabled): RPH-2014 Blue Collar Healthy Annuitant Mortality Table with a one-year set forward, (c) Marriage assumption: 80% of active and terminated vested participants are married with females assumed to be three years younger than males, (d) Terminated vested participants: Those over age 70 are assigned a 50% probability of collecting their benefits, (e) Disabled lives mortality: 150% of the RPH-2014 Disabled Retiree Mortality Table, (f) Investment return: 1.69% for 20 years and 1.66% thereafter, (g) Asset valuation method: actuarial smoothing method, (h) Withdrawal and retirement rates: age based rates based on experience studies, (i) Actuarial cost method: entry age normal, and (j) Administrative expense: \$150,000 annually.

The actuarial present value of accumulated plan benefits as of December 31, 2020 is as follows:

Actuarial present value of accumulated plan benefits:

Vested benefits:	
Participants and beneficiaries currently receiving benefits	\$ 14,280,687
Terminated vested participants	6,522,305
Active participants	<u>701,544</u>
	21,504,536
Nonvested benefits	<u>3,844</u>
Total actuarial present value of accumulated plan benefits	<u>\$ 21,508,380</u>

As reported by the actuary, the changes in the present value of accumulated plan benefits during the year ended December 31, 2020 were as follows:

Actuarial present value of accumulated plan benefits at beginning of year	<u>\$ 21,351,518</u>
Increase (decrease) during the year attributable to:	
Plan amendment*	(785,948)
Interest	438,978
Benefits paid	(1,290,005)
Benefits accumulated, including experience (gains) losses	585,258
Change in actuarial assumptions (a)	<u>1,208,579</u>
Net increase	<u>156,862</u>
Actuarial present value of accumulated plan benefits at end of year	<u>\$ 21,508,380</u>

* For valuation purposes, benefits were reduced to the PBGC maximum guaranteed benefit level effective April 1, 2020, the date of the plan's insolvency.

(a) The assumed interest rate was reduced from 2.12% for 20 years and 2.26% thereafter to 1.69% for 20 years and 1.66% thereafter. The assumed annual administrative expenses were increased from \$125,000 to \$150,000.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

7. CONCENTRATIONS

The Plan's participating employees and the Plan's participating employers are concentrated in the Philadelphia Pennsylvania area. They are also in an industry that has experienced significant reductions in active employees and active employers in the region.

8. FUNDING STATUS OF THE PLAN

ERISA imposes a minimum funding standard that requires the Plan to maintain a Funding Standard Account. Contributions meet the legal requirement on a cumulative basis if that account shows no deficiency. The accumulation of the actual contributions in excess of the minimum required contributions under ERISA is called the credit balance; whereas should contributions fall below the minimum levels, a funding deficiency results. The minimum funding requirements of ERISA were not met for 2021 and 2020. However, the Plan is not required to meet minimum funding requirements for years the Plan is in critical status as long as the Plan adopts a Rehabilitation Plan and complies with such Rehabilitation Plan.

The Pension Protection Act of 2006 (PPA) amended ERISA and the Internal Revenue Code to, among other things, impose additional funding rules for multiemployer plans with the goal of improving the financial condition of these plans. PPA also developed status categories based on a plan's funding level. The Plan's actuary is required to annually certify to the Secretary of the Treasury and the Plan's Board of Trustees. The Multiemployer Pension Reform Act of 2014 created a new status for underfunded plans called "Critical and Declining Status". The Plan's actuary has certified that the Plan is in Critical and Declining Status because it is below the minimum funding level and there is a projected insolvency within 20 years. The Plan's actuary projected that it will become insolvent in 2020.

A plan certified to be in Critical and Declining Status shall not emerge from that status until the plan is certified to no longer be in critical status and the plan is projected to avoid insolvency. A plan in Critical and Declining Status also is required to disclose the plan's projected date of insolvency, a statement that benefit reductions are possible, and whether the trustees have taken actions to avoid insolvency.

Plans in Critical or Critical and Declining Status must 1) develop a rehabilitation plan to stabilize the plan's funding status, 2) present the bargaining parties with one or more schedules of contribution increases and/or benefit reductions, and 3) impose temporary surcharges on contribution rates for contributing employers pending their adoption of a rehabilitation plan. In November 2010, the Board of Trustees adopted a Rehabilitation Plan that increased employer contribution rates and eliminated adjustable benefits. A revised Rehabilitation Plan was adopted in December 2012 and amended in December 2014 and October 2017 with the expectation of delaying insolvency. The Plan has made scheduled progress with the amended Rehabilitation Plan. The Rehabilitation Plan ended upon the Plan becoming insolvent on April 1, 2020.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION FUND
NOTES TO FINANCIAL STATEMENTS**

9. WITHDRAWAL LIABILITY

One of the two remaining employers closed on December 30, 2019. All active employee participants terminated that day except for a few employees who were kept on to help with the shut-down process. The company filed for Chapter 11 bankruptcy on April 13, 2020. The remaining employees were terminated by May 31, 2020. This employer accounted for 80% of 2019 employer contributions to the Plan.

A demand letter for withdrawal liability in the amount of \$10,611,992 was sent on May 20, 2020 and a proof of claim for the withdrawal liability was filed for the court. The ultimate realization of withdrawal liability assessments is not reasonably estimable. The Plan recognizes withdrawal liability income only when received and/or any pending arbitration and litigation have been settled.

10. INSOLVENCY AND THE PENSION BENEFIT GUARANTY CORPORATION

The Plan became insolvent in April 2020. In accordance with PBGC regulations, the Plan submitted the Application for Financial Assistance to PBGC. On March 13, 2020 the Trustees signed the PBGC Promissory Note and Security Agreement. Effective April 1, 2020, PBGC began providing financial assistance to the Plan, and during the year ended December 31, 2021 and 2020, the Plan received \$1,372,000 and \$1,416,200, respectively.

Amounts received from the PBGC are recognized as an addition to net assets in the period received. Supplemental funding provided by PBGC is technically a loan. However, due to the circumstances, repayment is considered no more than a contingency and no liability has been recorded. The ability of the Plan to continue operations and to pay benefits is dependent on PBGC continuing to provide financial assistance.

In the event that the Plan becomes solvent, the amount owed to PBGC (including interest) would be \$2,866,106 as of December 31, 2021.

The Plan is planning to file an application for Special Financial Assistance under the American Rescue Plan Act of 2021 (ARPA) in the Plan year beginning January 1, 2022.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
SCHEDULE OF ADMINISTRATIVE EXPENSES
FOR THE YEARS DECEMBER 31, 2021 AND 2020

	<u>2021</u>	<u>2020</u>
Administrative Expenses:		
Administrative Fee	\$ 39,500	\$ 37,367
Actuarial and Consulting Services	10,480	50,952
Insurance Expense	7,462	8,275
Accounting	12,500	12,500
Legal	35,770	45,654
PBGC Premium	-	-
Bank Trustee Fees	9,143	9,600
Miscellaneous	3,138	4,066
Total Administrative Expenses	<u>\$ 117,993</u>	<u>\$ 168,414</u>

The Accompanying Notes are an Integral
Part of the Financial Statements

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
EIN: 23-6209755, PLAN #001
SCHEDULE OF ASSETS HELD AT END OF YEAR
FORM 5500, SCHEDULE H, PART IV, ITEM 4(i)
DECEMBER 31, 2021

(a)	(b)	(c)		(d)	(e)
Identity of issue, borrower, lessor or similar party	Description of investment, maturity date, rate of interest, number of shares	Historical Cost	Current Value		
<u>Cash and Equivalents:</u>					
First American Gov't Obligation Fund	Cash and Equivalents	456,763	Shares	\$ 456,763	\$ 456,763
<u>Mutual Funds:</u>					
PGIM Total Return Bond Fund	Mutual Fund	2	Shares	36	35
Total Assets Held for Investment Purposes				<u>\$ 456,799</u>	<u>\$ 456,798</u>

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
EIN: 23-6209755, Plan #001
SCHEDULE OF REPORTABLE TRANSACTIONS*
FORM 5500, SCHEDULE H, PART IV, ITEM 4(j)
DECEMBER 31, 2021

(a) Party Involved	(b) Description of asset	(c) Purchase Price	(d) Selling Price	(e) Lease rental	(f) Expense incurred	(g) Cost of Asset	(h) Current Value	(i) Net Gain (Loss)
<u>Category 3 - Series of Transactions Exceeds 5% of Value</u>								
	First American Gov't Obligation Fund	1,405,713		-	-		1,405,713	
	First American Gov't Obligation Fund		1,417,658	-	-	1,417,658	1,417,658	-

*Represents a transaction or a series of transactions in securities of the same issue in excess of 5% of the plan assets as of December 31, 2020.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001
ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB - Statement by Enrolled Actuary

ADDITIONAL INFORMATION

- ▶ A schedule of active participant data providing age/service groups is attached.
- ▶ A maintenance schedule of the funding standard account bases amortized in items 9c and 9h is attached.
- ▶ A statement of the actuarial assumptions and methods used to determine the figures shown in items 1, 2, and 9 is attached.
- ▶ A schedule of projected benefit payments on a frozen plan basis (line 8b(1)) and a schedule of active participant data providing age/service groups (line 8b(2)) are attached.
- ▶ A summary of the principal eligibility and benefit provisions upon which the valuation was based is attached.
- ▶ Identification of significant benefits not included in the calculations: None.
- ▶ Interest on the employer contributions made to the plan has been calculated assuming an average payment on July 1 of the plan year.
- ▶ The investment return rates shown in items 6g and 6h are net of investment expenses but not of administrative expenses.
- ▶ The disbursements in item 1d(3) include administrative expenses expected to be paid from the trust during the year.
- ▶ This plan became insolvent on April 1, 2020. Since one contributing employer remains, the Plan has not terminated. Therefore, minimum funding requirements continue to apply.

STIPULATIONS

- ▶ For purposes of the valuation, reliance is placed on the financial information provided by the plan's auditor.
- ▶ We have relied on the correctness of the employee census data as provided by the plan administrator.
- ▶ The valuation is based on our interpretation of the plan provisions as described in the attached summary.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001
ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 4b - Illustration Supporting Actuarial Certification of Status
Schedule MB, Line 4c - Documentation Regarding Progress under Rehabilitation Plan
Schedule MB, Line 4f - Cash Flow Projections

Per the Rehabilitation Plan, as last amended by the Board of Trustees on October 18, 2017, scheduled progress is met if insolvency is projected not to occur before 2020. Per the 2019 zone status certification, insolvency was projected to occur in April 2020 and insolvency actually occurred in that month. Since the Plan did not become insolvent before the first day of the 2020 plan year, the Plan was certified as making scheduled progress for the 2019 plan year.

Due to the Plan's insolvency in April 2020, the rehabilitation plan and the rehabilitation period both ended in 2020.

Due to the Plan's insolvency in April 2020, no further zone status certifications are required starting with plan year beginning January 1, 2021.

Due to the Plan's insolvency in April 2020, no cash flow projections are provided.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001
ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 4b - Illustration Supporting Actuarial Certification of Status
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Due to the Plan's insolvency in April 2020, no further zone status certifications are required starting with plan year beginning January 1, 2021.

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BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 6 - Statement of Actuarial Assumptions/Methods

(A) Actuarial cost method

Entry age normal.

(B) Asset valuation method

Plan assets are valued using an actuarial smoothing method. Beginning with the January 1, 1995 plan year, the actuarial value of assets as of each valuation date is equal to the prior plan year's actuarial value adjusted to reflect contributions and disbursements, and then increased to reflect interest at the assumed investment rate. This value is then adjusted, up or down, by one-third of the difference between such value and the actual market value. In no event will the actuarial value of assets be less than 80% or more than 120% of the actual market value.

(C) Persons included

Based on data provided to us, all persons entitled to coverage under the plan as of the valuation date are included in the calculations.

(D) Significant actuarial assumptions

(1) Investment return

1.69% for 20 years and 1.66% thereafter, net of investment expenses.

(2) Retirement rates

<u>Age</u>	<u>Rate</u>
55 - 61	2%
62	15%
63	10%
64	10%
65	40%
66 - 69	33%
70	100%

Terminated vested participants are assumed to retire at age 65 or the valuation date, if later. Spouses of deceased terminated vested participants are assumed to retire when the participant would have attained age 65.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

Schedule MB, Line 6 - Statement of Actuarial Assumptions/Methods

(3) Mortality

The following headcount-weighted RPH-2014 Mortality Tables (Male/Female) are used:

- (a) Pre-retirement - RPH-2014 Blue Collar Employee Mortality Table with a one-year setback to reflect expected mortality improvement.
- (b) Post-retirement

Not disabled: RPH-2014 Blue Collar Healthy Annuitant Mortality Table with a one-year setforward (reduced from a prior two-year setforward) to reflect expected mortality improvement.

Disabled lives: 150% of the RPH-2014 Disabled Retiree Mortality Table.

(4) Withdrawal from service

- (a) Select rates are used in the first 5 years of service.

<u>Years of Service</u>	<u>Rate</u>
0	30%
1	20%
2	15%
3	15%
4	13%

- (b) After 5 years of service, turnover rates vary by attained age.

<u>Age</u>	<u>Rate</u>
25	8%
30	7%
35	7%
40	6%
45	6%
50	6%
55	3%
60	3%

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

Schedule MB, Line 6 - Statement of Actuarial Assumptions/Methods

(5) Disability

100% of the rates developed in a 1955 study of experience among several large industrial employee groups.

(6) Hours of work

It was assumed that each participant will work the same number of shifts in each future year that he worked in the most recent plan year.

(7) Allowance for other expenses

Administrative expenses payable from the trust are assumed to be covered by a \$150,000 addition to the normal cost.

(8) Expected employer contributions

Employees are assumed to work the same number of shifts in future years that they worked in the most recent plan year. At an annual rate of 5,226 shifts (the 2020 total for actives) and the contribution rate of \$6.55 per shift for the remaining employer), expected contributions are \$34,230 for 2021.

(9) Marriage

It was assumed that 80% of active and terminated vested participants are married with females assumed to be three years younger than males.

(10) Terminated vested participants

Terminated vested participants over age 70 are assigned a 50% probability of collecting their benefits.

(E) Data qualifications

If the date of birth was missing, the participant was assumed to be hired at age 30.

(F) Change in actuarial methods and assumptions

The actuarial methods and assumptions are the same as those used in the prior valuation except as follows:

- The assumed interest rate was reduced from 2.12% for 20 years and 2.26% thereafter to 1.69% for 20 years and 1.66% thereafter, which reflects the PBGC interest assumption for terminated plans in effect as of the current valuation date.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

Schedule MB, Line 6 - Statement of Actuarial Assumptions/Methods

(5) Disability

100% of the rates developed in a 1955 study of experience among several large industrial employee groups.

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Administrative expenses payable from the trust are assumed to be covered by a \$150,000 addition to the normal cost.

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Employees are assumed to work the same number of shifts in future years that they worked in the most recent plan year. At an annual rate of 5,226 shifts (the 2020 total for actives) and the contribution rate of \$6.55 per shift for the remaining employer), expected contributions are \$34,230 for 2021.

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It was assumed that 80% of active and terminated vested participants are married with females assumed to be three years younger than males.

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If the date of birth was missing, the participant was assumed to be hired at age 30.

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The actuarial methods and assumptions are the same as those used in the prior valuation except as follows:

- The assumed interest rate was reduced from 2.12% for 20 years and 2.26% thereafter to 1.69% for 20 years and 1.66% thereafter, which reflects the PBGC interest assumption for terminated plans in effect as of the current valuation date.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

Schedule MB, Line 6 - Statement of Actuarial Assumptions/Methods

- The assumed annual administrative expenses were increased from \$125,000 to \$150,000.

(G) Justification for changes in actuarial methods and/or assumptions

- The Plan has not terminated nor has a mass withdrawal been declared by the Board of Trustees. However, the Plan became insolvent as of April 1, 2020 and is now receiving financial assistance from the PBGC. The PBGC quarterly payments to the Plan are just sufficient to cover benefit payments and expenses. Consequently, with the low value of assets, the investment return is minimal. The investment return in 2020, the first year of insolvency, was 0.3%.
- Since this Plan is age-heavy with only one small contributing employer remaining, the liquidity of assets needed to pay the pension benefits provides no opportunity for long-term investment.
- Plan termination interest rate assumptions, which reflect rates at which annuities could be currently purchased, are now the best measure of the plan's liabilities in the absence of investable assets.
- The assumed annual administrative expenses were increased due to recent actual experience (\$168,000 in 2020) and expectations for 2021.

(H) Basis for selection of demographic assumptions

Demographic assumptions are based on national tables, as periodically updated, which are determined by the actuary to be appropriate for this plan. In the case of assumptions for which the experience of the plan is credible, plan experience is used. For example, administrative expenses are determined from recent experience, per the plan audit. The retirement assumption is determined from plan experience. These assumptions are periodically adjusted in light of developing experience.

(I) Basis for selection of economic assumptions

Interest assumptions are based on PBGC interest rates in the absence of investable assets. Hours worked in the coming year are assumed to be the same as the previous year. These assumptions are periodically adjusted in light of developing experience.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 6 - Summary of Plan Provisions

(As of January 1, 2021, after insolvency)

(A) Effective date and plan year

The effective date of the plan is January 1, 1962. As part of the Rehabilitation Plan, adjustable benefits were reduced effective January 1, 2011, including the change to the normal form of benefits from a five year certain and life annuity to a life annuity and the elimination of the disability benefit. Effective April 1, 2020, the plan became insolvent and pension benefit amounts, as needed, were reduced to the PBGC guaranteed benefit level.

The plan year is the calendar year.

(B) Eligibility for coverage

An employee who is a member of an Eligible Employee Classification becomes a participant in the plan on the first day of the month coincident with or next following the completion of one year of service. Journeymen Bookbinders become participants on the date of covered employment.

(C) Employee contributions

None.

(D) Normal retirement date

The normal retirement date is the first day of the month coincident with or next following the later of the attainment of age 65 or the 5th anniversary of plan participation. A participant cannot retire prior to participating in the plan for at least 5 years.

(E) Employment after normal retirement date

If employment continues beyond the normal retirement date, pension payments will not commence until actual retirement. However, pension payments will commence no later than April 1 of the calendar year following the year in which the participant attains age 70-1/2, if employment continues beyond such date. Additional pension credits continue to accrue until the actual retirement date.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 6 - Summary of Plan Provisions

(F) Break in service

A temporary break in service occurs if less than 60 shifts are worked in two consecutive plan years and less than 52 shifts in at least one of them. No break shall occur, however, during periods of authorized leaves of absence, military service, sickness, accident or job-protected leave under the Family Medical Leave Act of 1993. A temporary break in service becomes a permanent break in service when the period of temporary break equals or exceeds the greater of five years or credited service accumulated prior to the temporary break. A permanent break results in forfeiture of all credited service unless the participant has at least 5 years of vesting service.

(G) Credited service

Benefit accrual - one full year is credited for each plan year in which the participant is credited with at least 220 shifts. Fractional years are credited in years in which a participant works fewer than 220 shifts. Credited service is reduced by 1/10 for each 22 shifts less than 220 that the participant works in each plan year. No service credit is counted until a participant has completed two years of continuous service. Once two years of continuous service have been earned, service is retroactively credited.

Vesting - one year of Vesting Service is credited for each plan year in which at least 103 shifts (equivalent of 750 hours) are credited. No partial years are credited for vesting purposes.

(H) Normal retirement pension

- (1) Eligibility requirements - must be a participant at Normal Retirement Date and retire on or after that date.
- (2) Monthly pension - \$14.00 per month per year of Credited Service with no maximum on service. For valuation purposes, this benefit rate was reduced to the PBGC maximum guaranteed benefit level of \$13.25 per month effective April 1, 2020, the date the plan became insolvent.

(I) Early retirement pension

- (1) Eligibility requirements - must have reached age 55 with at least 5 years of Vesting Service.
- (2) Monthly pension - The normal retirement pension accrued to the early retirement date reduced by 1/2% for each month that the early retirement date precedes the Normal Retirement Date.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 6 - Summary of Plan Provisions

(J) Disability retirement pension

- (1) Effective for disability eligibility prior to January 1, 2011
 - (a) Eligibility requirements - must have at least 5 years of Credited Service. The disability must be total and permanent as defined in the plan and the participant must be entitled to a Social Security disability pension award.
 - (b) Monthly pension - the normal retirement pension accrued to the date of disability, unreduced for early commencement and payable as of the effective date of the Social Security disability award.
- (2) Effective January 1, 2011, the disability retirement pension is eliminated for participants who meet the eligibility requirements in (J)(1)(a) on and after January 1, 2011.

(K) Benefits payable on other termination of employment

- (1) Eligibility requirements - must have completed 5 or more years of Vesting Service.
- (2) Monthly pension - the normal retirement pension accrued to the date of termination reduced for early commencement as in (I)(2), if applicable.

(L) Pre-retirement death benefit

- (1) Eligibility requirements - an active or terminated vested participant who has completed 5 years of Vesting Service.
- (2) Nonmarried participant (*effective for deaths prior to April 1, 2020, the date the plan became insolvent*) - lump sum payment equal to \$108 per year that contributions were made between January 1, 1962 and December 31, 1973, plus \$126 per year that contributions were made between January 1, 1974 and December 31, 1975 plus \$157.50 per year that contributions were made on and after January 1, 1976. The maximum single sum payable is \$5,512.50, subject to any restrictions under Code Section 432(f)(2).
- (3) Married participant - If eligible for early retirement at death, the eligible spouse will receive a monthly benefit equal to 50% of the normal retirement pension computed as of the date of death, reduced for early commencement as if the participant had retired the day before his death. If younger than early retirement age at death, the benefit will be determined as of the date of death but reduced as if he had retired at the earliest retirement age and further reduced as if the participant had elected the continuation to the spouse under the 50% joint and survivor annuity. If the value of this benefit is less

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 6 - Summary of Plan Provisions

than the lump sum death benefit in (2) above, the excess will be paid to the surviving spouse in a lump sum.

Monthly payments commence on the first day of the month following the later of the participant's death or the month the participant would have attained early retirement age and will be payable during the surviving spouse's lifetime.

(M) Normal and optional forms of payment

(1) Normal form

(a) Married participant - automatic surviving spouse annuity providing a reduced pension payable to the retired participant during his lifetime with 50% continuing monthly for the life of his surviving spouse after his death. This is automatic unless the participant elects otherwise with the consent of his spouse.

(b) Single participant (for benefits commencing on or after January 1, 2011) - life annuity.

(2) Optional forms

(a) 75% Joint and Survivor Annuity - a reduced amount of pension is payable to the retired participant during his lifetime with the provision that after his death 75% of such reduced benefit shall continue to and for the lifetime of his eligible surviving spouse.

(b) Five Year Certain and Life Annuity (for benefits commencing on or after January 1, 2011) A reduced pension is payable to the retired participant during his lifetime, with the provision that if his death occurs before he has received 60 monthly payments, such payments will continue to his designated beneficiary until a total of 60 monthly payments have been made.

(3) Lump sum - payable if the actuarially equivalent present value of the vested accrued benefit is \$2,500 or less, subject to PBGC approval.

(N) Suspension of benefits

The retirement benefit otherwise payable to a pensioner shall be permanently suspended for each calendar month in which the pensioner completes 40 or more hours of service in the bookbinding industry, in an occupation in which the pensioner was employed at any time under the plan, and in the geographic area covered by the plan (as defined in Department of Labor Regulations Section 2530.203-3) at the time payment of benefits to the pensioner commenced.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE MB
Schedule MB, Line 6 - Summary of Plan Provisions

(O) Increases for retired participants

- (1) Effective October 1, 1987 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on October 1, 1987 received a 10% increase in his monthly benefit.
- (2) Effective January 1, 1992 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 1992 received a 10% increase in his monthly benefit.
- (3) Effective January 1, 2002 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 2002 received a 5% increase in his monthly benefit.

(P) Changes in plan provisions since January 1, 2020

Effective April 1, 2020, the Plan became insolvent and pension benefit amounts were reduced to the PBGC guaranteed benefit levels.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 8b(1) - Schedule of Projection of Expected Benefit Payments

<u>Year</u>	<u>Number of Recipients</u>	<u>Amount</u>
2021	452	\$ 1,278,000
2022	432	1,248,000
2023	412	1,217,000
2024	391	1,188,000
2025	371	1,159,000
2026	351	1,123,000
2027	331	1,099,000
2028	310	1,085,000
2029	290	1,058,000
2030	270	1,036,000

Notes:

- (1) Survivorship is based on the valuation assumptions.
- (2) For actives and those who have terminated with a vested deferred pension, this projection reflects only normal retirement pension benefits commencing at the normal retirement age. All current pension recipients are included.
- (3) No payments resulting from future terminations, disablements or deaths are reflected.
- (4) It is assumed that no future new entrants will be eligible for pension benefits during the next ten years.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001**

ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 8b(2) - Schedule of Active Participant Data

As of January 1, 2021

Age Last Birthday	Completed Years of Credited Service									
	1-4	5-9	10-14	15-19	20-24	25-29	30-34	35-39	40+	Total
Under 25	1									1
25 - 29										0
30 - 34										0
35 - 39	1	1								2
40 - 44					1					1
45 - 49		2		1						3
50 - 54	1		1	1						3
55 - 59	1		1			2		2		6
60 - 64	1						1	1	1	4
65 - 69			1							1
70 & over										0
Total	5	3	3	2	1	2	1	3	1	21

Note: No active participant has less than one year of benefit service.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Lines 9c and 9h - Schedule of Funding Standard Account Bases

Why Established	Date Established	Initial Amount	Outstanding Balance	Years Remaining	Charge (Credit)
Initial base	1/1/1977	\$ N/A	\$ 232,267	1	\$ 232,267
Plan amendment	1/1/1988	N/A	289,714	2	146,071
Plan amendment	1/1/1989	N/A	75,471	3	25,580
Plan amendment	1/1/1991	N/A	105,104	5	21,731
Plan amendment	1/1/1992	N/A	310,542	6	53,949
Assumption change	1/1/1994	N/A	39,321	3	13,327
Plan amendment	1/1/1998	N/A	60,929	12	5,558
Plan amendment	1/1/2001	N/A	608,419	15	45,491
Actuarial loss	1/1/2002	N/A	24,519	1	24,519
Plan amendment	1/1/2002	N/A	258,493	16	18,265
Actuarial loss	1/1/2003	N/A	123,983	2	62,511
Actuarial loss	1/1/2004	N/A	33,600	3	11,388
Actuarial loss	1/1/2005	233,248	70,567	4	18,088
Actuarial loss	1/1/2006	336,011	125,455	5	25,939
Actuarial gain	1/1/2007	(91,813)	(9,393)	1	(9,393)
Actuarial gain	1/1/2008	(98,446)	(19,452)	2	(9,807)
Actuarial loss	1/1/2009	2,784,110	797,256	3	270,218
Actuarial loss	1/1/2010	75,068	27,700	4	7,100
Actuarial loss	1/1/2011	141,739	63,211	5	13,069
Plan amendment	1/1/2011	(202,795)	(90,444)	5	(18,700)
Actuarial loss	1/1/2012	232,919	120,568	6	20,946
Assumption change	1/1/2012	310,195	160,575	6	27,896
Actuarial loss	1/1/2013	102,851	60,108	7	9,025
Assumption change	1/1/2013	(70,724)	(41,331)	7	(6,205)
Actuarial gain	1/1/2014	(397,300)	(256,893)	8	(34,026)
Actuarial gain	1/1/2015	(151,251)	(106,559)	9	(12,649)
Assumption change	1/1/2015	694,920	489,588	9	58,116
Actuarial gain	1/1/2016	(142,718)	(108,250)	10	(11,659)
Actuarial loss	1/1/2017	87,021	70,378	11	6,947
Actuarial gain	1/1/2018	(80,329)	(68,727)	12	(6,270)
Assumption change	1/1/2018	604,140	516,889	12	47,154
Actuarial gain	1/1/2019	(176,342)	(158,809)	13	(13,482)
Actuarial gain	1/1/2020	(722,535)	(681,115)	14	(54,127)
Assumption change	1/1/2020	8,150,575	7,683,335	14	610,576
Actuarial gain	1/1/2021	(907,523)	(907,523)	15	(67,854)
Plan amendment	1/1/2021	(791,269)	(791,269)	15	(59,162)
Assumption change	1/1/2021	1,208,662	<u>1,208,662</u>	15	<u>90,370</u>
Total			\$ 10,316,889		\$ 1,562,767

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE MB

Notes:

- (1) Outstanding balances are shown as of January 1, 2021, before any payments on account of the plan year.
- (2) Net outstanding balance of \$10,316,890 less credit balance/(funding deficiency) of \$(10,815,012) equals the unfunded accrued liability of \$21,131,902.
- (3) The years remaining for certain charge bases established on or before January 1, 2008 (including the initial base, actuarial losses and plan amendments) reflect the 5-year automatic extension effective January 1, 2008 approved by the IRS on March 18, 2009.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001
ATTACHMENT TO 2021 SCHEDULE MB

Schedule MB, Line 11 - Justification for Change in Actuarial Assumptions

Change in actuarial methods and assumptions

The actuarial methods and assumptions are the same as those used in the prior valuation except as follows:

- The assumed interest rate was reduced from 2.12% for 20 years and 2.26% thereafter to 1.69% for 20 years and 1.66% thereafter, which reflects the PBGC interest assumption for terminated plans in effect as of the current valuation date.
- The assumed annual administrative expenses were increased from \$125,000 to \$150,000.

Justification for changes in actuarial methods and/or assumptions

- The Plan has not terminated nor has a mass withdrawal been declared by the Board of Trustees. However, the Plan became insolvent as of April 1, 2020 and is now receiving financial assistance from the PBGC. The PBGC quarterly payments to the Plan are just sufficient to cover benefit payments and expenses. Consequently, with the low value of assets, the investment return is minimal. The investment return in 2020, the first year of insolvency, was 0.3%.
- Since this Plan is age-heavy with only one small contributing employer remaining, the liquidity of assets needed to pay the pension benefits provides no opportunity for long-term investment.
- Plan termination interest rate assumptions, which reflect rates at which annuities could be currently purchased, are now the best measure of the plan's liabilities in the absence of investable assets.
- The assumed annual administrative expenses were increased due to recent actual experience (\$168,000 in 2020) and expectations for 2021.

**SCHEDULE MB
(Form 5500)**

Department of the Treasury
Internal Revenue Service

Department of Labor
Employee Benefits Security Administration
Pension Benefit Guaranty Corporation

**Multiemployer Defined Benefit Plan and Certain
Money Purchase Plan Actuarial Information**

This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA) and section 6059 of the Internal Revenue Code (the Code).

▶ **File as an attachment to Form 5500 or 5500-SF.**

OMB No. 1210-0110

2021

**This Form is Open to Public
Inspection**

For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021

▶ **Round off amounts to nearest dollar.**

▶ **Caution:** A penalty of \$1,000 will be assessed for late filing of this report unless reasonable cause is established.

A Name of plan BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN	B Three-digit plan number (PN) ▶	001
C Plan sponsor's name as shown on line 2a of Form 5500 or 5500-SF BOT-BIE GCC/IBT PENSION PLAN	D Employer Identification Number (EIN) 23-6209755	

E Type of plan: (1) Multiemployer Defined Benefit (2) Money Purchase (see instructions)

1a Enter the valuation date: Month 01 Day 01 Year 2021

b Assets

(1) Current value of assets.....	1b(1)	436,712
(2) Actuarial value of assets for funding standard account	1b(2)	434,755

c (1) Accrued liability for plan using immediate gain methods	1c(1)	21,566,656
--	--------------	------------

(2) Information for plans using spread gain methods:

(a) Unfunded liability for methods with bases	1c(2)(a)	
(b) Accrued liability under entry age normal method	1c(2)(b)	
(c) Normal cost under entry age normal method	1c(2)(c)	
(3) Accrued liability under unit credit cost method	1c(3)	21,508,380

d Information on current liabilities of the plan:

(1) Amount excluded from current liability attributable to pre-participation service (see instructions)	1d(1)	
(2) "RPA '94" information:		
(a) Current liability.....	1d(2)(a)	22,437,988
(b) Expected increase in current liability due to benefits accruing during the plan year.....	1d(2)(b)	182,127
(c) Expected release from "RPA '94" current liability for the plan year.....	1d(2)(c)	1,277,406
(3) Expected plan disbursements for the plan year.....	1d(3)	1,277,406

Statement by Enrolled Actuary

To the best of my knowledge, the information supplied in this schedule and accompanying schedules, statements and attachments, if any, is complete and accurate. Each prescribed assumption was applied in accordance with applicable law and regulations. In my opinion, each other assumption is reasonable (taking into account the experience of the plan and reasonable expectations) and such other assumptions, in combination, offer my best estimate of anticipated experience under the plan.

SIGN HERE	RONALD C. STOKES <i>R.S.</i>	10/04/2022
	Signature of actuary	Date
	RONALD C. STOKES	2005287
	Type or print name of actuary	Most recent enrollment number
	RICHARD GABRIEL ASSOCIATES	215-773-0900
	Firm name	Telephone number (including area code)
	601 DRESHER ROAD SUITE 201 HORSHAM PA 19044-2203	
	Address of the firm	

If the actuary has not fully reflected any regulation or ruling promulgated under the statute in completing this schedule, check the box and see instructions

For Paperwork Reduction Act Notice, see the Instructions for Form 5500 or 5500-SF.

Schedule MB (Form 5500) 2021
v. 201209

j If box h is checked, enter period of use of shortfall method 5j

k Has a change been made in funding method for this plan year? Yes No

l If line k is "Yes," was the change made pursuant to Revenue Procedure 2000-40 or other automatic approval? Yes No

m If line k is "Yes," and line l is "No," enter the date (MM-DD-YYYY) of the ruling letter (Individual or class) approving the change in funding method 5m

6 Checklist of certain actuarial assumptions:

a Interest rate for "RPA '94" current liability..... 6a 2.08 %

	Pre-retirement	Post-retirement
b Rates specified in insurance or annuity contracts.....	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
c Mortality table code for valuation purposes:		
(1) Males	6c(1) 13-1	13+1
(2) Females	6c(2) 13F-1	13F+1
d Valuation liability interest rate	6d 1.69 %	1.69 %
e Expense loading	6e 589.5 % <input type="checkbox"/> N/A	0.0 % <input checked="" type="checkbox"/> N/A
f Salary scale.....	6f % <input checked="" type="checkbox"/> N/A	
g Estimated investment return on actuarial value of assets for year ending on the valuation date.....	6g	2.0 %
h Estimated investment return on current value of assets for year ending on the valuation date	6h	0.3 %

7 New amortization bases established in the current plan year:

(1) Type of base	(2) Initial balance	(3) Amortization Charge/Credit
1	-907,523	-67,854
3	-791,269	-59,162
4	1,208,662	90,370

8 Miscellaneous information:

a If a waiver of a funding deficiency has been approved for this plan year, enter the date (MM-DD-YYYY) of the ruling letter granting the approval 8a

b(1) Is the plan required to provide a projection of expected benefit payments? (See the instructions.) If "Yes," attach a schedule..... Yes No

b(2) Is the plan required to provide a Schedule of Active Participant Data? (See the instructions.) If "Yes," attach a schedule..... Yes No

c Are any of the plan's amortization bases operating under an extension of time under section 412(e) (as in effect prior to 2008) or section 431(d) of the Code?..... Yes No

d If line c is "Yes," provide the following additional information:

(1) Was an extension granted automatic approval under section 431(d)(1) of the Code?.....		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(2) If line 8d(1) is "Yes," enter the number of years by which the amortization period was extended	8d(2)	5
(3) Was an extension approved by the Internal Revenue Service under section 412(e) (as in effect prior to 2008) or 431(d)(2) of the Code?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(4) If line 8d(3) is "Yes," enter number of years by which the amortization period was extended (not including the number of years in line (2)).....	8d(4)	
(5) If line 8d(3) is "Yes," enter the date of the ruling letter approving the extension	8d(5)	
(6) If line 8d(3) is "Yes," is the amortization base eligible for amortization using interest rates applicable under section 6621(b) of the Code for years beginning after 2007?		<input type="checkbox"/> Yes <input type="checkbox"/> No

e If box 5h is checked or line 8c is "Yes," enter the difference between the minimum required contribution for the year and the minimum that would have been required without using the shortfall method or extending the amortization base(s) 8e -545,434

9 Funding standard account statement for this plan year:			
Charges to funding standard account:			
a Prior year funding deficiency, if any	9a		10,815,012
b Employer's normal cost for plan year as of valuation date.....	9b		175,447
c Amortization charges as of valuation date:	Outstanding balance		
(1) All bases except funding waivers and certain bases for which the amortization period has been extended	9c(1)	13,556,654	1,866,101
(2) Funding waivers	9c(2)	0	0
(3) Certain bases for which the amortization period has been extended	9c(3)	0	0
d Interest as applicable on lines 9a, 9b, and 9c.....	9d		217,276
e Total charges. Add lines 9a through 9d.....	9e		13,073,836
Credits to funding standard account:			
f Prior year credit balance, if any.....	9f		0
g Employer contributions. Total from column (b) of line 3.....	9g		36,064
	Outstanding balance		
h Amortization credits as of valuation date.....	9h	3,239,765	303,334
i Interest as applicable to end of plan year on lines 9f, 9g, and 9h	9i		5,431
j Full funding limitation (FFL) and credits:			
(1) ERISA FFL (accrued liability FFL).....	9j(1)	10,669,657	
(2) "RPA '94" override (90% current liability FFL)	9j(2)	19,482,413	
(3) FFL credit	9j(3)		0
k (1) Waived funding deficiency	9k(1)		0
(2) Other credits	9k(2)		0
l Total credits. Add lines 9f through 9i, 9j(3), 9k(1), and 9k(2)	9l		344,829
m Credit balance: If line 9l is greater than line 9e, enter the difference	9m		
n Funding deficiency: If line 9e is greater than line 9l, enter the difference.....	9n		12,729,007
9 o Current year's accumulated reconciliation account:			
(1) Due to waived funding deficiency accumulated prior to the 2021 plan year.....	9o(1)		0
(2) Due to amortization bases extended and amortized using the interest rate under section 6621(b) of the Code:			
(a) Reconciliation outstanding balance as of valuation date	9o(2)(a)		0
(b) Reconciliation amount (line 9c(3) balance minus line 9o(2)(a)).....	9o(2)(b)		0
(3) Total as of valuation date.....	9o(3)		0
10 Contribution necessary to avoid an accumulated funding deficiency. (See instructions.).....	10		12,729,007
11 Has a change been made in the actuarial assumptions for the current plan year? If "Yes," see instructions.....			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001

ATTACHMENT TO 2021 SCHEDULE R

Schedule R, Part V - Summary of Rehabilitation Plan

The Plan status was initially certified as Critical by the Plan actuary for the 2010 Plan Year, and the Plan remained in Critical status up to the 2014 plan year. With insolvency projected within 20 years based on the information available at the time the actuarial zone status was determined for the 2015 plan year, under the changes implemented by the Multiemployer Pension Reform Act of 2014, the plan status became Critical and Declining in 2015.

Due to the Plan's initial critical status, the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan adopted a Rehabilitation Plan on November 26, 2010. The original Rehabilitation Plan included employer contribution increases and the elimination of adjustable benefits. This original Rehabilitation Plan did not meet the targets of a regular Rehabilitation Plan, but it was intended to avoid insolvency.

The original Rehabilitation Period began on January 1, 2013 and was scheduled to end on December 31, 2022. Since annual contribution increases of \$2.50 per shift, which were necessary to avoid a funding deficiency by the end of the Rehabilitation Period, would have meant substantial business hardship for the contributing employers, the Trustees adopted an extended Rehabilitation Plan, in which the Plan was expected to avoid insolvency.

The original Rehabilitation Plan provided for an employer contribution increase effective January 1, 2011 of \$0.65 to the \$5.00 per shift contribution in 2010 and future annual increases of \$0.90 per shift and the reduction of two adjustable benefits. Effective January 1, 2011, the normal form of benefit was reduced from a five year certain and life annuity to a life annuity and the disability retirement benefit was eliminated. The Plan also applied for a five-year extension of most of its amortization charge bases, effective January 1, 2008.

The Board of Trustees recognized in 2012 that the Pension Plan may not be able to avoid insolvency but that it may only be able to delay insolvency under all of the circumstances considered, including but not limited to, the largest employer's stated intention to withdraw from the Plan in the absence of a modified Rehabilitation Plan with no future contribution increases. After consulting with the Fund's actuary, on December 14, 2012, the Trustees adopted new Employer Contribution Schedules which are applicable for collective bargaining agreements renewed or extended after December 14, 2012.

The revised Rehabilitation Plan as of December 14, 2012 is insufficient to prevent insolvency; its only goal is to delay insolvency. Based on projections as of January 1, 2013, the first day of the rehabilitation period, the Plan was projected to become insolvent in May of 2020.

**BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN/PN: 23-6209755/001**

ATTACHMENT TO 2021 SCHEDULE R

Schedule R, Part V - Summary of Rehabilitation Plan

The Board of Trustees, at its meeting on October 18, 2017, updated the Rehabilitation Plan, effective for plan years beginning on or after January 1, 2017, to amend the annual standard for measuring scheduled progress such that scheduled progress is made if the Plan does not become insolvent before 2020.

In spite of favorable asset performance of 17.3% in 2019, the plan still became insolvent in April of 2020 and began receiving financial assistance from the PBGC. Since insolvency did not occur before January 1, 2020, the Plan was certified as making scheduled progress for the 2019 plan year.

The Bindery Industry Employers GCC/IBT Pension Plan's Rehabilitation Plan and the Rehabilitation Period ended on April 1, 2020, the date the Plan became insolvent.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
EIN: 23-6209755, Plan #001
SCHEDULE OF REPORTABLE TRANSACTIONS*
FORM 5500, SCHEDULE H, PART IV, ITEM 4(j)
DECEMBER 31, 2021

(a) Party Involved	(b) Description of asset	(c) Purchase Price	(d) Selling Price	(e) Lease rental	(f) Expense incurred	(g) Cost of Asset	(h) Current Value	(i) Net Gain (Loss)
<u>Category 3 - Series of Transactions Exceeds 5% of Value</u>								
	First American Gov't Obligation Fund	1,405,713		-	-		1,405,713	
	First American Gov't Obligation Fund		1,417,658	-	-	1,417,658	1,417,658	-

*Represents a transaction or a series of transactions in securities of the same issue in excess of 5% of the plan assets as of December 31, 2020.

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND
EIN: 23-6209755, PLAN #001
SCHEDULE OF ASSETS HELD AT END OF YEAR
FORM 5500, SCHEDULE H, PART IV, ITEM 4(i)
DECEMBER 31, 2021

(a)	(b)	(c)		(d)	(e)
Identity of issue, borrower, lessor or similar party	Description of investment, maturity date, rate of interest, number of shares	Historical Cost	Current Value		
<u>Cash and Equivalents:</u>					
First American Gov't Obligation Fund	Cash and Equivalents	456,763	Shares	\$ 456,763	\$ 456,763
<u>Mutual Funds:</u>					
PGIM Total Return Bond Fund	Mutual Fund	2	Shares	36	35
Total Assets Held for Investment Purposes				\$ 456,799	\$ 456,798

Form 5500

Department of the Treasury
Internal Revenue Service

Department of Labor
Employee Benefits Security
Administration

Pension Benefit Guaranty Corporation

Annual Return/Report of Employee Benefit Plan

This form is required to be filed for employee benefit plans under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and sections 6057(b) and 6058(a) of the Internal Revenue Code (the Code).

▶ **Complete all entries in accordance with the instructions to the Form 5500.**

OMB Nos. 1210-0110
1210-0089

2021

This Form is Open to Public Inspection

Part I Annual Report Identification Information

For calendar plan year 2021 or fiscal plan year beginning 01/01/2021 and ending 12/31/2021

- A** This return/report is for: a multiemployer plan a multiple-employer plan (Filers checking this box must attach a list of participating employer information in accordance with the form instructions.)
 a single-employer plan a DFE (specify) _____
- B** This return/report is: the first return/report the final return/report
 an amended return/report a short plan year return/report (less than 12 months)
- C** If the plan is a collectively-bargained plan, check here.
- D** Check box if filing under: Form 5558 automatic extension the DFVC program
 special extension (enter description)
- E** If this is a retroactively adopted plan permitted by SECURE Act section 201, check here.

Part II Basic Plan Information—enter all requested information

1a Name of plan BINDERY INDUSTRY EMPLOYERS GCC / IBT PENSION PLAN	1b Three-digit plan number (PN) ▶ <u>001</u>
	1c Effective date of plan <u>01/01/1962</u>
2a Plan sponsor's name (employer, if for a single-employer plan) Mailing address (include room, apt., suite no. and street, or P.O. Box) City or town, state or province, country, and ZIP or foreign postal code (if foreign, see instructions) BOT-BIE GCC / IBT PENSION PLAN 601 DRESHER ROAD SUITE 201 HORSHAM, PA 19044-2203	2b Employer Identification Number (EIN) <u>23-6209755</u>
	2c Plan Sponsor's telephone number <u>215-773-0900</u>
	2d Business code (see instructions) <u>323100</u>
	(Empty field)

Caution: A penalty for the late or incomplete filing of this return/report will be assessed unless reasonable cause is established.

Under penalties of perjury and other penalties set forth in the instructions, I declare that I have examined this return/report, including accompanying schedules, statements and attachments, as well as the electronic version of this return/report, and to the best of my knowledge and belief, it is true, correct, and complete.

SIGN HERE		<u>10/14/22</u>	<u>John Potts</u>
	Signature of plan administrator	Date	Enter name of individual signing as plan administrator
SIGN HERE			
	Signature of employer/plan sponsor	Date	Enter name of individual signing as employer or plan sponsor
SIGN HERE			
	Signature of DFE	Date	Enter name of individual signing as DFE

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**Actuarial Valuation
as of January 1, 2022**

richard Gabriel associates
Employee Benefits Consultants and Actuaries



richard Gabriel associates

Employee Benefits Consultants and Actuaries

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601 Dresher Road, Suite 201

Horsham, Pennsylvania 19044-2203

December 13, 2022

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
601 Dresher Road, Suite 201
Horsham, PA 19044

Dear Board of Trustees:

This letter presents the results of our actuarial valuation of the Bindery Industry Employers GCC/IBT Pension Plan as of January 1, 2022. The plan became insolvent on April 1, 2020 and began receiving financial assistance from the Pension Benefit Guaranty Corporation (PBGC). The valuation was based on the plan provisions in effect on January 1, 2022 and reflects the reduction of benefits to the PBGC maximum guaranteed level.

The financial data was provided by the plan's auditor and the basic participant data by the plan administrator. The actuarial values were calculated by us on the basis of this data, our interpretation of the plan provisions, and the actuarial assumptions as disclosed in Appendix A. Highlights of the valuation appear in the Executive Summary.

The actuarial experience of the plan since the last valuation was more favorable than anticipated by the actuarial assumptions, producing a net actuarial gain of \$1,432,093. This gain was due almost entirely to the PBGC financial assistance of \$1,372,000 received in 2021 due to the plan's insolvency. The liability gains from more than expected deaths were partially offset by unfavorable asset performance. The plan assets earned 1.1% in 2021 on an actuarial value basis and 0.0% on a market value basis, compared to the assumed rate of return of 1.69%.

In order to better reflect actual experience of this plan and reasonable future expectations, we have made the following change to the actuarial assumptions:

- The assumed interest rate was increased from 1.69% for 20 years and 1.66% thereafter to 2.37% for 20 years and 2.03% thereafter, which mirrors the PBGC interest assumption for terminated plans in effect as of the valuation date.

This change decreased the plan's unfunded accrued liability by \$1,466,984.

The minimum required contribution has increased from \$12,765,376 in 2021 to \$14,344,822 in 2022 due to the plan's accumulated funding deficiency. The funding deficiency has increased from \$10,815,012 as of December 31, 2020 to \$12,729,007 as of December 31, 2021.

The expected employer contributions of \$35,874 for the 2022 plan year are insufficient to meet the minimum funding requirements.

The Rehabilitation Plan ended upon the plan becoming insolvent on April 1, 2020. Also, due to the plan's insolvency, annual zone status certifications are not required after 2020.

ACTUARIAL CERTIFICATION

The information and results contained in this actuarial valuation report as of January 1, 2022 were prepared for the use of the Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan and its auditors. The actuarial computations made are for purposes of determining the plan's funding requirements and accounting disclosures under FASB Accounting Standards Codification 960 (ASC 960). The report has been prepared for the purposes outlined herein and should not be relied upon for any other purpose. Determinations for purposes other than meeting the plan's funding and financial accounting requirements may be significantly different than the results presented in this report. To avoid misrepresentation, the report is intended to be used in its entirety.

Our calculations were based upon the participant data as of December 31, 2021, as provided by the plan's administrator, and the financial data as of December 31, 2021 received from the plan's auditor. While the scope of our engagement did not call for us to perform an audit or independent verification of this information, we have reviewed this information for reasonableness. The accuracy of the results is dependent upon the accuracy and completeness of the underlying information, which is the responsibility of those who supply the data.

The actuarial cost method and assumptions, other than those prescribed by law or regulations, are selected by the actuary. In our opinion, the actuarial methods used are appropriate for the purposes of the valuation, and each economic assumption (other than those prescribed by law or regulation) was selected from a range which represents our best estimate of anticipated experience under the plan.

Furthermore, the demographic assumptions used, in the aggregate, are reasonable (taking into account the experience of the plan and reasonable expectations). In our opinion, the actuarial methods used are appropriate for purposes of the valuation and the actuarial assumptions used represent our best estimate of anticipated experience of this group.

Future actuarial measurements may differ significantly from current measurements presented in this report due to such factors as the following: plan experience different from that anticipated by the economic or demographic assumptions, changes in economic or demographic assumptions, increases or decreases expected as part of the natural operation of the methodology used for these measurements (such as the end of an amortization period or additional cost or contribution requirements based on the plan's funded status) and changes in plan provisions, accounting standards or applicable law. Due to the limited scope of the actuary's assignment, the actuary did not perform an analysis of the potential range of such future measurements.

Board of Trustees
Bindery Industry Employers
GCC/IBT Pension Plan
December 13, 2022
Page Three

We certify this report has been prepared in accordance with generally accepted actuarial principles and practices and, to the best of our knowledge, fairly presents the actuarial position of the plan as of January 1, 2022. The actuary and the firm responsible for this report have no conflicts of interest that may impair the objectivity of our work. We further certify that we meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.

Sincerely,

A handwritten signature in black ink that reads "Ronald C. Stokes". The signature is written in a cursive, flowing style.

Ronald C. Stokes, FSA, MAAA
Enrolled Actuary No. 20-05287

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

EXECUTIVE SUMMARY

A summary of the principal results of the current and preceding actuarial valuations follows:

	<u>January 1, 2022</u>	<u>January 1, 2021</u>
(A) Number of participants		
• Active	23	21
• Vested terminated	211	233
• Retired and disabled	<u>452</u>	<u>450</u>
• Total	686	704
(B) Normal cost	\$ 167,733	\$ 175,447
(C) Unfunded accrued liability at the beginning of the plan year	\$18,731,996	\$21,131,901
(D) Contribution levels		
• Contribution rate per shift	\$ 6.55	\$ 6.55
• Expected Employer contribution	\$ 35,874	\$ 34,230
• Actual Employer contribution	To be determined	36,064
• PBGC financial assistance	To be determined	1,372,000
• Minimum required (end of plan year)	\$14,344,822	\$12,765,376
• Maximum deductible	\$28,483,438	\$30,305,975
• Amortization period	Infinite	Infinite
(E) Plan assets at the beginning of the plan year		
• Market value	\$ 438,628	\$ 436,712
• Actuarial value	\$ 441,515	\$ 434,755
(F) Value of accumulated plan benefits at the beginning of the plan year		
• Vested	\$19,068,083	\$21,504,536
• Nonvested	<u>7,633</u>	<u>3,844</u>
• Total	\$19,075,716	\$21,508,380
(G) Unfunded vested benefits	\$18,629,455	\$21,067,824
(H) Plan assets as a percentage of accumulated benefits		
• Market value	2.3%	2.0%
• Actuarial value	2.3%	2.0%

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

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**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

I. PLAN ASSETS

(per Audit)

(A) Statement of plan assets as of December 31, 2021 at market value

Cash and equivalents	\$ 456,763
Mutual funds - Fixed income	35
Employer contributions receivable	3,065
Accrued income	3
Prepaid expenses	<u>1,064</u>
Total assets	\$ 460,930
Administrative expenses payable	<u>(22,302)</u>
Net assets available for benefits	\$ 438,628

(B) Statement of changes in plan assets (market value)

Receipts	
Employer contributions	\$ 36,064
PBGC funding	1,372,000
Interest and dividends	62
Net realized and unrealized gains/(losses)	<u>23</u>
Total receipts	\$ 1,408,149
Disbursements	
Benefit payments	\$ 1,288,240
Administrative expenses	117,993
Investment expenses	<u>0</u>
Total disbursements	\$ 1,406,233
Net receipts	\$ 1,916
Plan assets	
January 1, 2021	\$ 436,712
December 31, 2021	\$ 438,628

Assets are positive due to PBGC loans of \$2,788,200 as of December 31, 2021.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Determination of actuarial value of assets as of January 1, 2022

(1)	Actuarial value of Fund assets at January 1, 2021	\$ 434,755
(2)	(1) x 1.0169	\$ 442,102
(3)	Contributions to the Fund during year (including PBGC funding)	\$ 1,408,064
(4)	Interest on (3) from date of payment to December 31, 2021 at 1.69% per annum*	\$ 11,898
(5)	Disbursements (excluding investment expenses)	\$ 1,406,233
(6)	Interest on (5) to December 31, 2021 at 1.69% per annum**	\$ 12,873
(7)	Expected actuarial value at December 31, 2021 = (2) + (3) + (4) - (5) - (6)	\$ 442,958
(8)	Market value of Fund assets at December 31, 2021	\$ 438,628
(9)	Difference between market value and expected actuarial value = (8) - (7)	\$ (4,330)
(10)	Preliminary actuarial value of assets = (7) + 1/3 of (9)	\$ 441,515
(11)	(8) x 1.20	\$ 526,354
(12)	(8) x 0.80	\$ 350,902
(13)	Actuarial value of Fund assets at January 1, 2022 = (10), but not more than (11) or less than (12)	\$ 441,515

(D) Valuation assets

For purposes of this valuation, the actuarial value of plan assets in (C)(13) of \$441,515 is used.

(E) Asset returns

Rate of return on market value of plan assets (net of investment expenses)	0.0%
Rate of return on actuarial value of plan assets (net of investment expenses)	1.1%

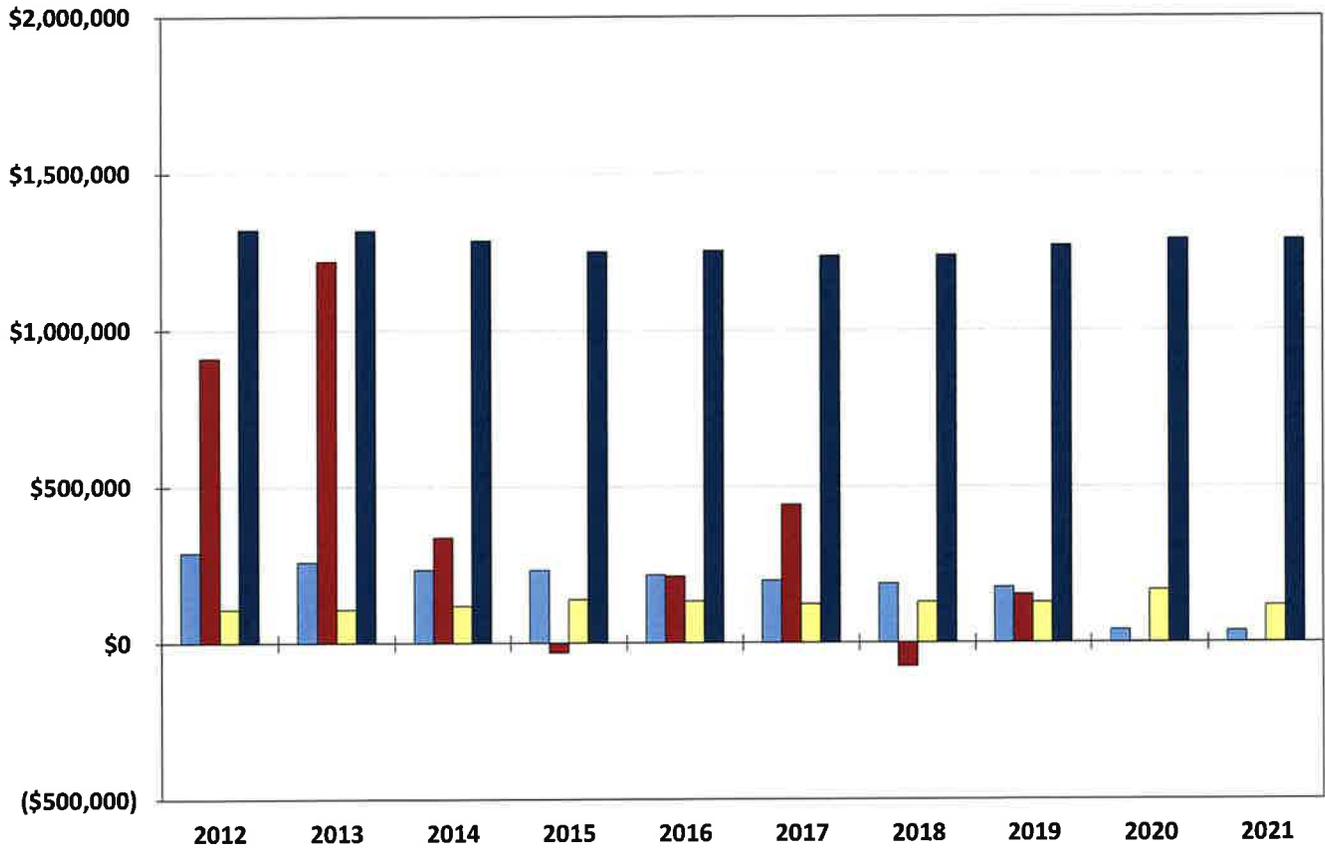
*Assumes that contributions occur on July 1, on average.

**Assumes disbursements are paid on the first day of the month.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART I

**HISTORY OF RECEIPTS AND DISBURSEMENTS
FOR PLAN YEARS ENDING DECEMBER 31**



■ Employer Contributions ■ Investment Earnings
■ Administrative Expenses ■ Benefit Payments

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

II. UNFUNDED ACCRUED LIABILITY

(A)	Unfunded accrued liability as of January 1, 2021	\$ 21,131,901
(B)	Normal cost for the plan year (with expenses)	\$ 175,447
(C)	Interest on (A) and (B) for one year	\$ 360,094
(D)	Employer contributions on account of the plan year	\$ 36,064
(E)	Interest on (D) from the dates paid to the end of the plan year*	\$ 305
(F)	Expected unfunded accrued liability as of January 1, 2022 = (A) + (B) + (C) - (D) - (E)	\$ 21,631,073
(G)	Actual unfunded accrued liability as of January 1, 2022, before change	\$ 20,198,980
(H)	Actuarial gain (loss) = (F) - (G)	\$ 1,432,093
(I)	Change in unfunded accrued liability due to assumption change	\$ (1,466,984)
(J)	Unfunded accrued liability as of January 1, 2022, after change = (G) + (I)	\$ 18,731,996

* Contributions are assumed paid on July 1, 2021, on average.

** For valuation purposes, benefits were reduced to the PBGC maximum guaranteed benefit level effective April 1, 2020, the date of the plan's insolvency.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**III. FUNDING STANDARD ACCOUNT
(Plan year ending December 31, 2021)**

(A)	Charges to Funding Standard Account	
(1)	Prior year funding deficiency	\$ 10,815,012
(2)	Normal cost for the plan year (with expenses)	175,447
(3)	Amortization charges (on \$13,556,654)	1,866,101
(4)	Interest on (1), (2) and (3)	<u>217,276</u>
(5)	Total charges	\$ 13,073,836
(B)	Credits to Funding Standard Account	
(1)	Prior year credit balance	\$ 0
(2)	Contributions for the plan year	36,064
(3)	Amortization credits (on \$3,239,765)	303,334
(4)	Interest on (1), (2) and (3)	<u>5,431</u>
(5)	Total credits	\$ 344,829
(C)	Credit balance (funding deficiency) as of December 31, 2021 = (B)(5) - (A)(5)	\$(12,729,007)

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IV. SUMMARY OF VALUATION RESULTS

All values shown are as of January 1, 2022

(A)	Normal cost (with expenses)	\$ 167,733
(B)	Accrued liability	
(1)	Present value of all benefits payable in future years:	
(a)	Active participants (23)	\$ 932,133
(b)	Vested terminated participants (211)	4,919,684
(c)	Retired participants (452)	<u>13,443,811</u>
(d)	Total (688)	\$ 19,295,628
(2)	Present value of future normal costs	\$ 122,117
(3)	Accrued liability = (1)(d) - (2)	\$ 19,173,511
(C)	Valuation assets	\$ 441,515
(D)	Unfunded accrued liability = (B)(3) - (C), but not less than zero	\$ 18,731,996

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

V. DEVELOPMENT OF CONTRIBUTION LEVELS

(A)	The minimum required contribution to avoid a funding deficiency in the funding standard account for the 2022 plan year is determined as follows:	
(1)	Charges to Funding Standard Account	
(a)	Prior year funding deficiency	\$12,729,007
(b)	Normal cost for the plan year	167,733
(c)	Amortization charges (on \$11,888,122)	1,646,141
(d)	Interest on (a), (b) and (c)	<u>344,667</u>
(e)	Total charges	\$14,887,547
(2)	Credits to Funding Standard Account	
(a)	Prior year credit balance	\$ 0
(b)	Amortization credits (on \$5,885,133)	530,160
(c)	Interest on (a) and (b)	<u>12,565</u>
(d)	Total credits	\$ 542,725
(3)	Minimum required contribution to be made at the end of the plan year equals excess, if any, of (1)(e) over (2)(d)	\$14,344,822

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(B)	The maximum deductible contribution for the plan year ending December 31, 2022 is determined as follows:	
(1)	Normal cost for the plan year	\$ 167,733
(2)	10 year amortization of unfunded actuarial accrued liability	2,076,724
(3)	Interest on (1) and (2)	<u>53,194</u>
(4)	Total	\$ 2,297,651
(5)	Minimum required contribution = (A)(3)	\$ 14,344,823
(6)	Full funding limitation = (C)(3)	\$ 19,350,608
(7)	Tax deductible limit equals (4), but not less than (5), nor more than (6); or (C)(2)(e), if greater	\$ 28,483,438
(C)	Development of full funding limitation for maximum deductible purposes	
(1)	Based on accrued liability	
(a)	Accrued liability (including normal cost)	\$ 19,341,244
(b)	Applicable assets (lesser of actuarial or market value)	\$ 438,628
(c)	Full funding limitation at end of year = [(a) - (b)] x 1.0237, but not less than zero	\$ 19,350,608
(2)	Based on 90% of RPA 94 current liability*	
(a)	Current liability projected to end of year	\$ 20,345,313
(b)	90% of (a)	\$ 18,310,782
(c)	Applicable assets projected to end of year	\$ 0
(d)	Full funding limitation = (b) - (c), but not less than zero	\$ 18,310,782
(e)	Unfunded current liability = [1.4 x (a)] - (c), but not less than zero	\$ 28,483,438
(3)	Full funding limit = greater of (1)(c) or (2)(d)	\$ 19,350,608

* Based on 2.22% interest, the RP-2014 Mortality Table with projected improvements for all healthy participants, and other assumptions as described in Appendix A.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(D) Schedule of amortization bases

<u>Why Established</u>	<u>Date Established</u>	<u>Initial Amount</u>	<u>Outstanding Balance</u>	<u>Years Remaining</u>	<u>Charge (Credit)</u>
Plan amendment	1/1/1988	\$ N/A	\$ 146,071	1	\$ 146,071
Plan amendment	1/1/1989	N/A	50,734	2	25,664
Plan amendment	1/1/1991	N/A	84,782	4	21,946
Plan amendment	1/1/1992	N/A	260,929	5	54,659
Assumption change	1/1/1994	N/A	26,433	2	13,371
Plan amendment	1/1/1998	N/A	56,307	11	5,739
Plan amendment	1/1/2001	N/A	572,441	14	47,401
Plan amendment	1/1/2002	N/A	244,288	15	19,090
Actuarial loss	1/1/2003	N/A	62,511	1	62,511
Actuarial loss	1/1/2004	N/A	22,587	2	11,426
Actuarial loss	1/1/2005	233,248	53,366	3	18,027
Actuarial loss	1/1/2006	336,011	101,198	4	26,195
Actuarial gain	1/1/2008	(98,446)	(9,808)	1	(9,808)
Actuarial loss	1/1/2009	2,784,110	535,945	2	271,111
Actuarial loss	1/1/2010	75,068	20,948	3	7,147
Actuarial loss	1/1/2011	141,739	50,989	4	13,199
Plan amendment	1/1/2011	(202,795)	(72,956)	4	(18,885)
Actuarial loss	1/1/2012	232,919	101,306	5	21,221
Assumption change	1/1/2012	310,195	134,921	5	28,263
Actuarial loss	1/1/2013	102,851	51,946	6	9,172
Assumption change	1/1/2013	(70,724)	(35,720)	6	(6,307)
Actuarial gain	1/1/2014	(397,300)	(226,633)	7	(34,695)
Actuarial gain	1/1/2015	(151,251)	(95,497)	8	(12,938)
Assumption change	1/1/2015	694,920	438,764	8	59,446
Actuarial gain	1/1/2016	(142,718)	(98,223)	9	(11,964)
Actuarial loss	1/1/2017	87,021	64,503	10	7,151
Actuarial gain	1/1/2018	(80,329)	(63,513)	11	(6,474)
Assumption change	1/1/2018	604,140	477,674	11	48,687
Actuarial gain	1/1/2019	(176,342)	(147,783)	12	(13,963)
Actuarial gain	1/1/2020	(722,535)	(637,584)	13	(56,229)
Assumption change	1/1/2020	8,150,575	7,192,290	13	634,298
Actuarial gain	1/1/2021	(907,523)	(853,859)	14	(70,704)
Plan amendment	1/1/2021	(791,269)	(744,480)	14	(61,647)
Assumption change	1/1/2021	1,208,662	1,137,189	14	94,166
Actuarial gain	1/1/2022	(1,432,093)	(1,432,093)	15	(111,910)
Assumption change	1/1/2022	(1,466,984)	<u>(1,466,984)</u>	15	<u>(114,636)</u>
Total			\$ 6,002,989		\$ 1,115,981

BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN

(D) Schedule of amortization bases *(cont'd)*

Notes:

- (1) Outstanding balances are shown as of January 1, 2022, before any payments on account of the plan year.
- (2) Net outstanding balance of \$6,002,989 less credit balance/(funding deficiency) of \$(12,729,007) equals the unfunded accrued liability of \$18,731,996.
- (3) The years remaining for certain charge bases established on or before January 1, 2008 (including the initial base, actuarial losses and plan amendments) reflect the 5-year automatic extension effective January 1, 2008 approved by the IRS on March 18, 2009.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VI. ACTUARIAL PRESENT VALUE OF ACCUMULATED PLAN BENEFITS

(A)	Actuarial present value of accumulated plan benefits as of January 1, 2022	
(1)	Vested benefits	
	(a) In-payment participants (452)	\$ 13,443,811
	(b) Terminated vested participants (211)	4,919,684
	(c) Active participants (20)	<u>704,588</u>
	(d) Total (683)	\$ 19,068,083
(2)	Nonvested benefits (3)	<u>7,633</u>
(3)	Total accumulated plan benefits (686)	\$ 19,075,716
(4)	Plan assets (market value)	\$ 438,628
(5)	Unfunded vested benefits = (1)(d) - (4)	\$ 18,629,455
(6)	Plan assets as a percentage of the value of vested benefits = (4) ÷ (1)(d)	2.3%
(B)	Change in actuarial present value of accumulated plan benefits	
(1)	Actuarial present value of accumulated plan benefits as of January 1, 2021	\$ 21,508,380
(2)	Increase (decrease) during the year attributable to:	
	(a) Plan amendment	\$ 0
	(b) Change in actuarial assumptions	(1,464,788)
	(c) Benefits accumulated and actuarial (gains)/losses	(32,242)
	(d) Interest accrued due to decrease in the discount period	352,606
	(e) Benefits paid	<u>(1,288,240)</u>
	(f) Net increase (decrease)	\$ (2,432,664)
(3)	Actuarial present value of accumulated plan benefits as of January 1, 2022	\$ 19,075,716
(C)	Present value of administrative expenses	\$ 335,957

Notes:

- (1) The present values shown above were calculated in accordance with Interpretations 1 and 2 of the American Academy of Actuaries. The assumed investment rate of return is based on an interest assumption of 2.37% for 20 years and 2.03% thereafter.
- (2) The present value of administrative expenses was calculated using ERISA 4044 methodology, but with an interest rate no less than 1.0%.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART II

COMPARISON OF LIABILITIES TO ASSETS FOR PLAN YEARS BEGINNING JANUARY 1

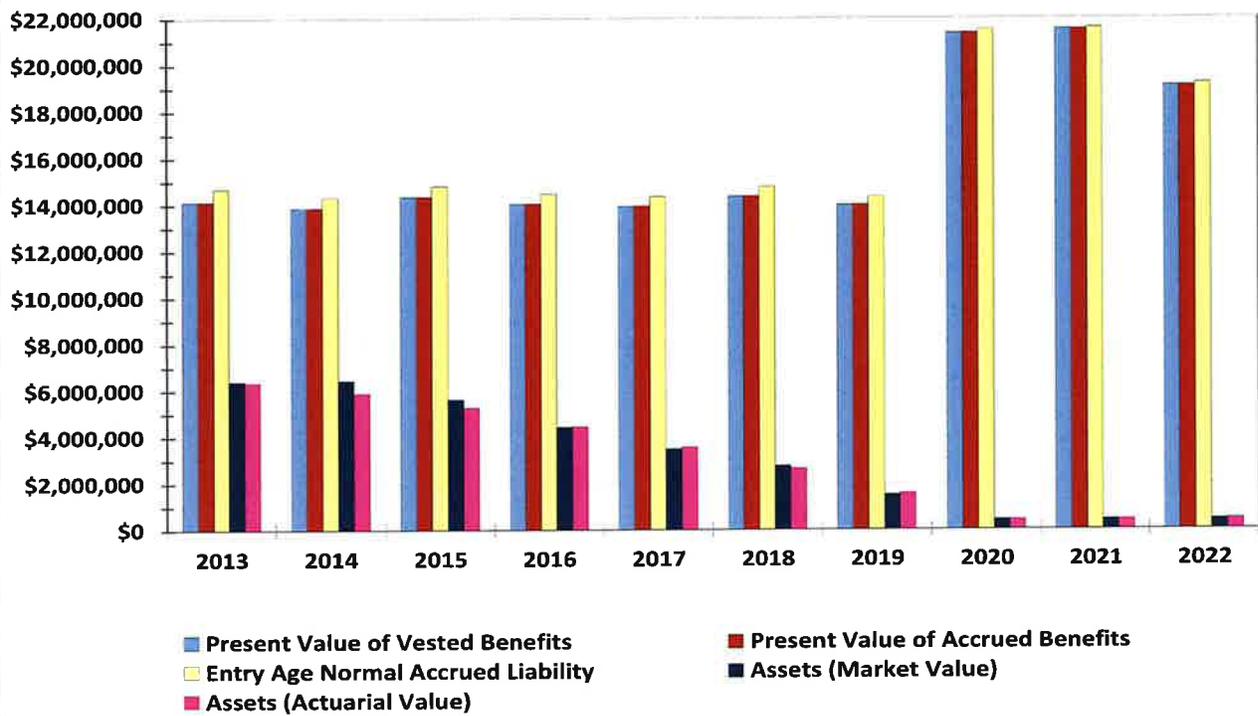
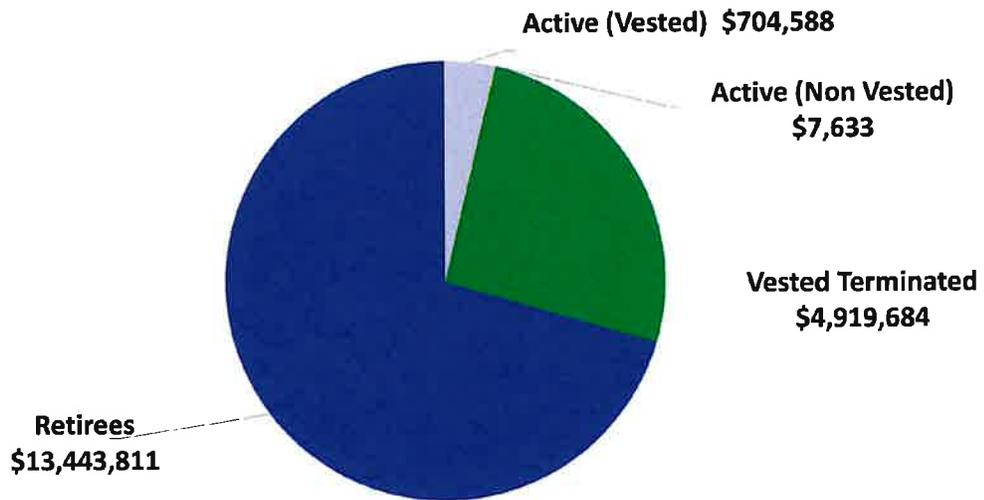


CHART III

BREAKDOWN OF PRESENT VALUE OF ACCUMULATED BENEFITS BY CATEGOR



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(C) Unfunded vested benefits (Presumptive method)

<u>Date</u>	<u>Vested Benefits Interest Rate</u>	<u>Value of Vested Benefits</u>	<u>Asset Value⁽¹⁾</u>	<u>Unfunded Vested Benefits⁽²⁾</u>
12/31/2000	8.0%	\$ 13,161,490	\$ 13,765,888	\$ (604,398)
12/31/2001	8.0%	13,729,764	12,855,490	874,274
12/31/2002	8.0%	13,966,603	11,234,306	2,732,297
12/31/2003	7.5%	14,352,701	12,245,649	2,107,052
12/31/2004	7.5%	14,617,090	12,500,580	2,116,510
12/31/2005	7.5%	14,525,963	12,170,594	2,355,369
12/31/2006	7.5%	14,482,705	12,569,788	1,912,917
12/31/2007	7.5%	14,391,719	12,337,060	2,054,659
12/31/2008	7.5%	14,644,094	7,591,676	7,052,418
12/31/2009	7.5%	14,419,795	8,014,810	6,404,985
12/31/2010	7.5%	14,402,684 ⁽³⁾	7,831,775	6,570,909
12/31/2011	7.5%	14,511,116 ⁽³⁾	6,626,197	7,884,919
12/31/2012	7.5%	14,306,141 ⁽³⁾	6,398,374	7,907,767
12/31/2013	7.5%	14,033,278 ⁽³⁾	6,451,692	7,581,586
12/31/2014 ⁽⁴⁾	7.5%	13,811,434 ⁽³⁾	5,618,297	8,193,137
12/31/2015	7.5%	14,171,573 ⁽³⁾	4,430,843	9,740,730
12/31/2016	7.5%	14,059,344 ⁽³⁾	3,475,390	10,583,954
12/31/2017	7.5%	13,881,391 ⁽³⁾	2,756,882	11,124,509
12/31/2018	7.0%	14,078,232 ⁽³⁾	1,503,084	12,575,148
12/31/2019	7.0%	13,337,287 ⁽³⁾	436,930	12,900,357
12/31/2020	2.12%/2.26%	20,341,155 ⁽³⁾	436,712	19,904,443
12/31/2021	1.69%/1.66%	20,597,628 ⁽³⁾	438,628	20,159,000

Employer Withdrawal Liability is expected for any employer who withdraws from the plan prior to January 1, 2023.

Notes:

- (1) Asset values are market values.
- (2) The amount of Unfunded Vested Benefits is obtained by subtracting the market value of the plan assets from the value of vested benefits determined using ongoing plan assumptions as outlined in Appendix A.
- (3) Includes the additional value of vested adjustable benefits as of January 1, 2011 of \$182,312. For withdrawal liability purposes, the unamortized amount is added over the next 15 years.
- (4) Effective December 31, 2014, excludes effect of any assumption changes effective on the first day of the next plan year.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VII. PROJECTED PENSION PAYMENTS

<u>Year</u>	<u>Number of Recipients</u>	<u>Amount</u>
2022	454	\$ 1,274,000
2023	434	1,231,000
2024	415	1,190,000
2025	394	1,161,000
2026	375	1,125,000
2027	356	1,097,000
2028	337	1,081,000
2029	318	1,051,000
2030	298	1,027,000
2031	279	998,000

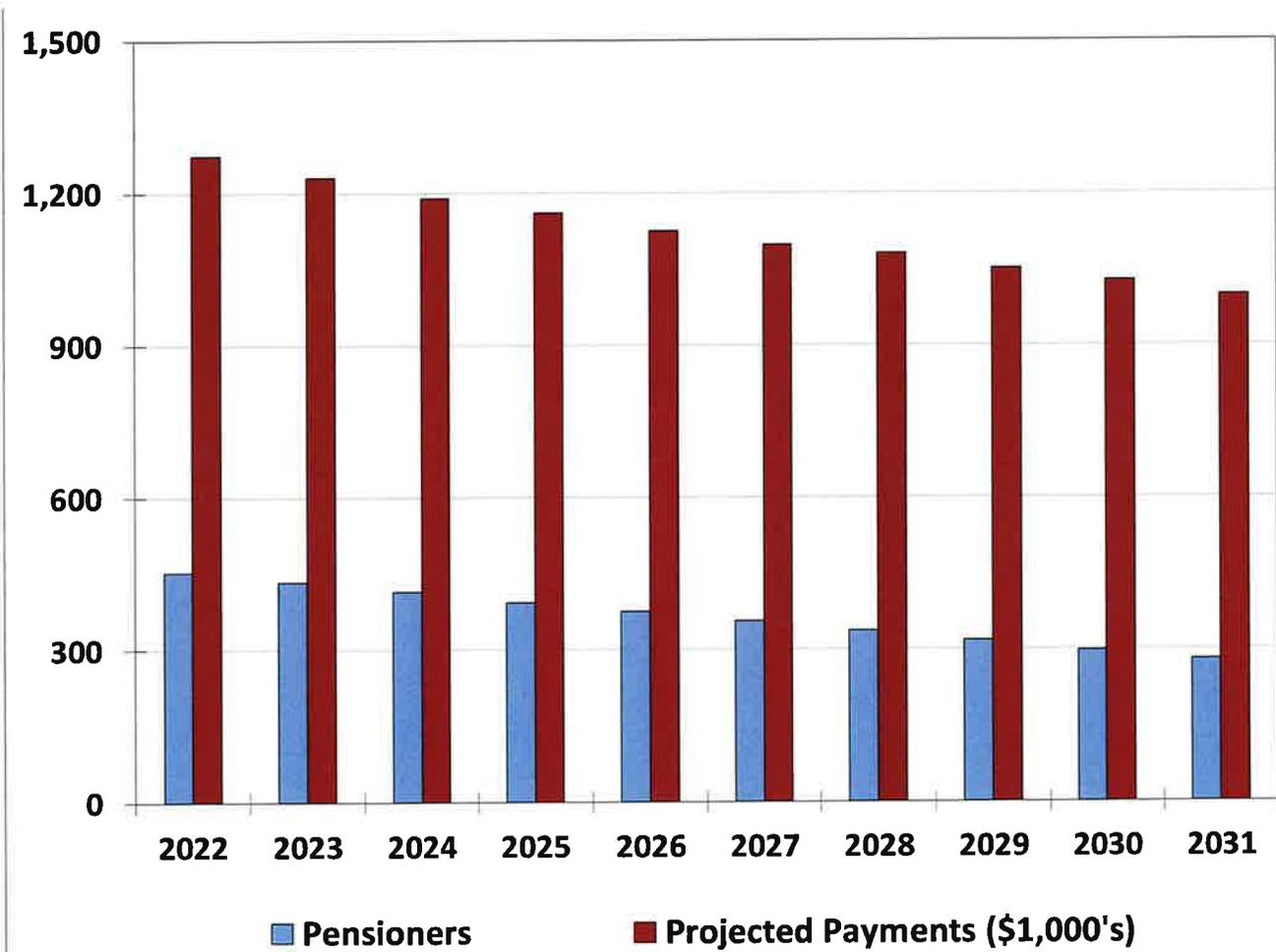
Notes:

- (1) Survivorship is based on the valuation assumptions.
- (2) For actives and those who have terminated with a vested deferred pension, this projection reflects only normal retirement pension benefits commencing at the normal retirement age. All current pension recipients are included.
- (3) No payments resulting from future terminations, disablements or deaths are reflected.
- (4) It is assumed that no future new entrants will be eligible for pension benefits during the next ten years.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART IV

PROJECTED PENSIONERS AND ANNUAL PENSION PAYMENTS



**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

VIII. PARTICIPANT DATA

**TABLE 1. DISTRIBUTION OF ACTIVE PARTICIPANTS
BY AGE AND SERVICE GROUPS**

As of January 1, 2022

Age Last Birthday	Completed Years of Credited Service									Total
	1-4	5-9	10-14	15-19	20-24	25-29	30-34	35-39	40+	
Under 25	2									2
25 - 29										0
30 - 34										0
35 - 39		1								1
40 - 44					1					1
45 - 49		1	1		1					3
50 - 54		1	1	1						3
55 - 59		1	1	1				2		5
60 - 64	1			1		2	1		2	7
65 - 69			1							1
70 & over										0
Total	3	4	4	3	2	2	1	2	2	23

Note: No active participant has less than one year of benefit service.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

**TABLE 2. DISTRIBUTION OF INACTIVE PARTICIPANTS
BY AGE GROUP**

Terminated Vested Participants and Beneficiaries with Rights to Future Benefits

<u>Age Last Birthday</u>	<u>Number of Participants</u>	<u>Total Monthly Benefit**</u>	<u>Average Monthly Benefit**</u>
Under 30	0	\$ 0.00	\$ 0.00
30 - 34	4	418.71	104.68
35 - 39	9	1,022.93	113.66
40 - 44	19	3,056.60	160.87
45 - 49	19	3,418.54	179.92
50 - 54	43	7,747.22	180.17
55 - 59	69	11,873.54	172.08
60 - 64	35	6,506.42	185.90
65 & over	13	2,398.30	184.48
Total	211	\$36,442.26	\$172.71

Normal, Early & Disability Retirements and Beneficiaries

<u>Age Last Birthday</u>	<u>Number of Participants*</u>	<u>Total Monthly Benefit</u>	<u>Average Monthly Benefit</u>
Under 55	3	\$ 663.53	\$221.18
55 - 59	16	2,400.49	150.03
60 - 64	48	10,372.95	216.10
65 - 69	76	19,594.07	257.82
70 - 74	82	21,812.76	266.01
75 - 79	78	17,946.63	230.09
80 - 84	72	18,303.24	254.21
85 - 89	45	9,179.25	203.98
90 & over	34	5,269.37	154.98
Total	454	\$105,542.29	\$232.47

*Includes two alternate payees under a qualified domestic relations order (QDRO).

**Reflects reductions due to PBGC Guaranteed Benefit reductions.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

IX. SUMMARY OF PARTICIPANT DATA

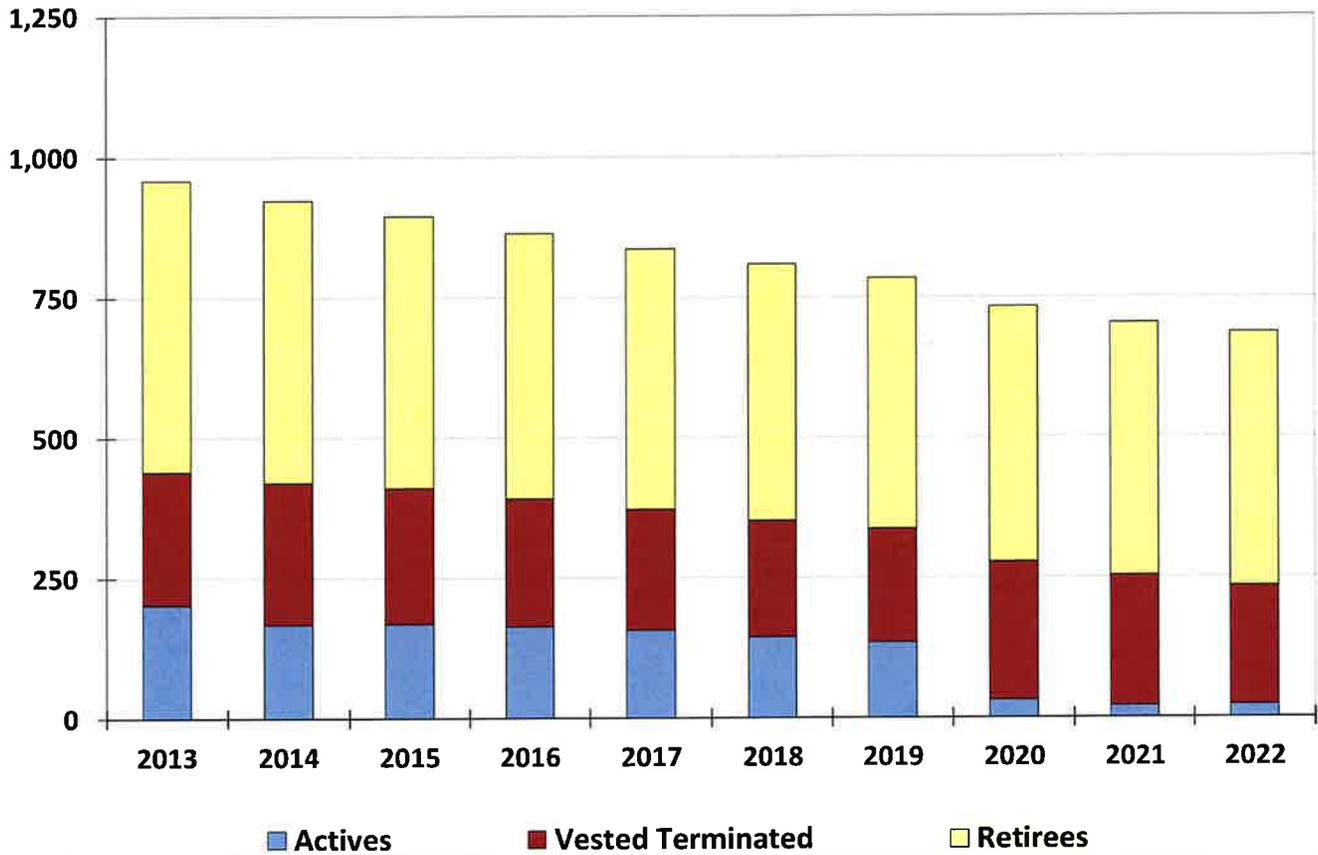
	<u>January 1, 2022</u>	<u>January 1, 2021</u>
(A) Active Participants		
(1) Number	23	21
(2) Average benefit service to date	19.0	18.2
(3) Average attained age	53.1	52.7
(4) Accrued annual pension		
(a) Total	\$ 65,107	\$ 56,701
(b) Average	\$ 2,831	\$ 2,700
(5) Projected annual pension		
(a) Total	\$ 104,779	\$ 93,153
(b) Average	\$ 4,556	\$ 4,436
(B) Vested terminated participants		
(1) Number	211	233
(2) Accrued annual pension		
(a) Total	\$ 437,307	\$ 507,453
(b) Average	\$ 2,073	\$ 2,178
(C) Disabled pensioners		
(1) Number	27	28
(2) Annual pension		
(a) Total	\$ 82,596	\$ 86,695
(b) Average	\$ 3,059	\$ 3,096
(D) Other pensioners and beneficiaries		
(1) Number	427*	424*
(2) Annual pension		
(a) Total	\$1,183,912	\$1,171,373
(b) Average	\$ 2,773	\$ 2,763

* Two participants are both a pensioner and a beneficiary. Pensioners include two alternate payees under a qualified domestic relations order (QDRO).

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

CHART V

PARTICIPANT CENSUS COMPARISON



	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>
Actives	202	168	169	164	157	144	135	31	21	23
Vested Terminated	238	253	242	228	215	208	203	247	233	211
Retirees	519	502	484	472	464	457	446	455	450	452

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

X. RECONCILIATION OF CENSUS DATA

	<u>Actives</u>	<u>Terminated Vesteds</u>	<u>Retirees, Disabled Retirees and Beneficiaries*</u>	<u>Total</u>
Participants as of 1/1/2021	21	233	452	706
New participants	1	0	0	1
Reemployed participants	2	(2)	0	0
Nonvested terminations	(1)	0	0	(1)
Vested terminations	0	0	0	0
Retirements	0	(16)	16	0
Deaths with beneficiary	0	0	(2)	(2)
Deaths without beneficiary	0	(4)	(14)	(18)
Deaths with lump sum paid	0	0	0	0
New beneficiaries	0	0	2	2
Other	0	0	0	0
Benefits expired	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Participants as of 1/1/2022	23	211	454	688

*Retirees include two alternate payees under a qualified domestic relations order (QDRO) as of January 1, 2021 and January 1, 2022.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

ACTUARIAL METHODS AND ASSUMPTIONS

(A) Actuarial cost method

Entry age normal.

(B) Asset valuation method

Plan assets are valued using an actuarial smoothing method. Beginning with the January 1, 1995 plan year, the actuarial value of assets as of each valuation date is equal to the prior plan year's actuarial value adjusted to reflect contributions and disbursements, and then increased to reflect interest at the assumed investment rate. This value is then adjusted, up or down, by one-third of the difference between such value and the actual market value. In no event will the actuarial value of assets be less than 80% or more than 120% of the actual market value.

(C) Persons included

Based on data provided to us, all persons entitled to coverage under the plan as of the valuation date are included in the calculations.

(D) Significant actuarial assumptions

(1) Investment return

2.37% for 20 years and 2.03% thereafter, net of investment expenses.

(2) Retirement rates

<u>Age</u>	<u>Rate</u>
55 - 61	2%
62	15%
63	10%
64	10%
65	40%
66 - 69	33%
70	100%

Terminated vested participants are assumed to retire at age 65 or the valuation date, if later. Spouses of deceased terminated vested participants are assumed to retire when the participant would have attained age 65.

**BINDERY INDUSTRY EMPLOYERS
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(3) Mortality

The following headcount-weighted RPH-2014 Mortality Tables (Male/Female) are used:

(a) Pre-retirement - RPH-2014 Blue Collar Employee Mortality Table with a one-year setback to reflect expected mortality improvement.

(b) Post-retirement

Not disabled: RPH-2014 Blue Collar Healthy Annuitant Mortality Table with a one-year setforward (reduced from a prior two-year setforward) to reflect expected mortality improvement.

Disabled lives: 150% of the RPH-2014 Disabled Retiree Mortality Table.

(4) Withdrawal from service

(a) Select rates are used in the first 5 years of service.

<u>Years of Service</u>	<u>Rate</u>
0	30%
1	20%
2	15%
3	15%
4	13%

(b) After 5 years of service, turnover rates vary by attained age.

<u>Age</u>	<u>Rate</u>
25	8%
30	7%
35	7%
40	6%
45	6%
50	6%
55	3%
60	3%

**BINDERY INDUSTRY EMPLOYERS
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(5) Disability

100% of the rates developed in a 1955 study of experience among several large industrial employee groups.

(6) Hours of work

It was assumed that each participant will work the same number of shifts in each future year that he worked in the most recent plan year.

(7) Allowance for other expenses

Administrative expenses payable from the trust are assumed to be covered by a \$150,000 addition to the normal cost.

(8) Expected employer contributions

Employees are assumed to work the same number of shifts in future years that they worked in the most recent plan year. At an annual rate of 5,477 shifts (the 2021 total for actives) and the contribution rate of \$6.55 per shift for the remaining employer), expected contributions are \$35,874 for 2022.

(9) Marriage

It was assumed that 80% of active and terminated vested participants are married with females assumed to be three years younger than males.

(10) Terminated vested participants

Terminated vested participants over age 70 are assigned a 50% probability of collecting their benefits.

(E) Data qualifications

If the date of birth was missing, the participant was assumed to be hired at age 30.

(F) Change in actuarial methods and assumptions

The actuarial methods and assumptions are the same as those used in the prior valuation except as follows:

- The assumed interest rate was increased from 1.69% for 20 years and 1.66% thereafter to 2.37% for 20 years and 2.03% thereafter, which reflects the PBGC interest assumptions for terminated plans in effect as of the current valuation date.

**BINDERY INDUSTRY EMPLOYERS
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(G) Justification for changes in actuarial methods and/or assumptions

- The plan has not terminated nor has a mass withdrawal been declared by the Board of Trustees. However, the plan became insolvent as of April 1, 2020 and is now receiving financial assistance from the PBGC. The PBGC quarterly payments to the plan are just sufficient to cover benefit payments and expenses. Consequently, with the low value of assets, the investment return is minimal. The investment return in 2020, the first year of insolvency, was 0.3%. It was 0.0% in 2021.
- Since this plan is age-heavy with only one small contributing employer remaining, the liquidity of assets needed to pay the pension benefits provides no opportunity for long-term investment.
- Plan termination interest rate assumptions, which reflect rates at which annuities could be currently purchased, are now the best measure of the plan's liabilities in the absence of investable assets.

(H) Basis for selection of demographic assumptions

Demographic assumptions are based on national tables, as periodically updated, which are determined by the actuary to be appropriate for this plan. In the case of assumptions for which the experience of the plan is credible, plan experience is used. For example, administrative expenses are determined from recent experience, per the plan audit. The retirement assumption is determined from plan experience. These assumptions are periodically adjusted in light of developing experience.

(I) Basis for selection of economic assumptions

Interest assumptions are based on PBGC interest rates in the absence of investable assets. Hours worked in the coming year are assumed to be the same as the previous year. These assumptions are periodically adjusted in light of developing experience.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

PLAN SUMMARY

(As of January 1, 2022, after insolvency)

(A) Effective date and plan year

The effective date of the plan is January 1, 1962. As part of the Rehabilitation Plan, adjustable benefits were reduced effective January 1, 2011, including the change to the normal form of benefits from a five year certain and life annuity to a life annuity and the elimination of the disability benefit. Effective April 1, 2020, the plan became insolvent and pension benefit amounts, as needed, were reduced to the PBGC guaranteed benefit level.

The plan year is the calendar year.

(B) Eligibility for coverage

An employee who is a member of an Eligible Employee Classification becomes a participant in the plan on the first day of the month coincident with or next following the completion of one year of service. Journeymen Bookbinders become participants on the date of covered employment.

(C) Employee contributions

None.

(D) Normal retirement date

The normal retirement date is the first day of the month coincident with or next following the later of the attainment of age 65 or the 5th anniversary of plan participation. A participant cannot retire prior to participating in the plan for at least 5 years.

(E) Employment after normal retirement date

If employment continues beyond the normal retirement date, pension payments will not commence until actual retirement. However, pension payments will commence no later than April 1 of the calendar year following the year in which the participant attains age 70-1/2, if employment continues beyond such date. Additional pension credits continue to accrue until the actual retirement date.

**BINDERY INDUSTRY EMPLOYERS
GCC/IBT PENSION PLAN**

(F) Break in service

A temporary break in service occurs if less than 60 shifts are worked in two consecutive plan years and less than 52 shifts in at least one of them. No break shall occur, however, during periods of authorized leaves of absence, military service, sickness, accident or job-protected leave under the Family Medical Leave Act of 1993. A temporary break in service becomes a permanent break in service when the period of temporary break equals or exceeds the greater of five years or credited service accumulated prior to the temporary break. A permanent break results in forfeiture of all credited service unless the participant has at least 5 years of vesting service.

(G) Credited service

Benefit accrual - one full year is credited for each plan year in which the participant is credited with at least 220 shifts. Fractional years are credited in years in which a participant works fewer than 220 shifts. Credited service is reduced by 1/10 for each 22 shifts less than 220 that the participant works in each plan year. No service credit is counted until a participant has completed two years of continuous service. Once two years of continuous service have been earned, service is retroactively credited.

Vesting - one year of Vesting Service is credited for each plan year in which at least 103 shifts (equivalent of 750 hours) are credited. No partial years are credited for vesting purposes.

(H) Normal retirement pension

- (1) Eligibility requirements - must be a participant at Normal Retirement Date and retire on or after that date.
- (2) Monthly pension - \$14.00 per month per year of Credited Service with no maximum on service. For valuation purposes, this benefit rate was reduced to the PBGC maximum guaranteed benefit level of \$13.25 per month effective April 1, 2020, the date the plan became insolvent.

(I) Early retirement pension

- (1) Eligibility requirements - must have reached age 55 with at least 5 years of Vesting Service.
- (2) Monthly pension - The normal retirement pension accrued to the early retirement date reduced by ½% for each month that the early retirement date precedes the Normal Retirement Date.

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(J) Disability retirement pension

- (1) Effective for disability eligibility prior to January 1, 2011
 - (a) Eligibility requirements - must have at least 5 years of Credited Service. The disability must be total and permanent as defined in the plan and the participant must be entitled to a Social Security disability pension award.
 - (b) Monthly pension - the normal retirement pension accrued to the date of disability, unreduced for early commencement and payable as of the effective date of the Social Security disability award.
- (2) Effective January 1, 2011, the disability retirement pension is eliminated for participants who meet the eligibility requirements in (J)(1)(a) on and after January 1, 2011.

(K) Benefits payable on other termination of employment

- (1) Eligibility requirements - must have completed 5 or more years of Vesting Service.
- (2) Monthly pension - the normal retirement pension accrued to the date of termination reduced for early commencement as in (I)(2), if applicable.

(L) Pre-retirement death benefit

- (1) Eligibility requirements - an active or terminated vested participant who has completed 5 years of Vesting Service.
- (2) Nonmarried participant (*effective for deaths prior to April 1, 2020, the date the plan became insolvent*) - lump sum payment equal to \$108 per year that contributions were made between January 1, 1962 and December 31, 1973, plus \$126 per year that contributions were made between January 1, 1974 and December 31, 1975 plus \$157.50 per year that contributions were made on and after January 1, 1976. The maximum single sum payable is \$5,512.50, subject to any restrictions under Code Section 432(f)(2).
- (3) Married participant - If eligible for early retirement at death, the eligible spouse will receive a monthly benefit equal to 50% of the normal retirement pension computed as of the date of death, reduced for early commencement as if the participant had retired the day before his death, and further reduced as if he had elected the continuation to the spouse under the 50% joint and survivor annuity option. If younger than early retirement age at death, the benefit will be determined as of the date of death but reduced as if he

**BINDERY INDUSTRY EMPLOYERS
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had retired at the earliest retirement age and further reduced as if the participant had elected the continuation to the spouse under the 50% joint and survivor annuity. For deaths prior to April 1, 2020, if the value of this benefit is less than the lump sum death benefit in (2) above, the excess will be paid to the surviving spouse in a lump sum.

Monthly payments commence on the first day of the month following the later of the participant's death or the month the participant would have attained early retirement age and will be payable during the surviving spouse's lifetime.

(M) Normal and optional forms of payment

(1) Normal form

- (a)** Married participant - automatic surviving spouse annuity providing a reduced pension payable to the retired participant during his lifetime with 50% continuing monthly for the life of his surviving spouse after his death. This is automatic unless the participant elects otherwise with the consent of his spouse.
- (b)** Single participant (for benefits commencing on or after January 1, 2011) - life annuity.

(2) Optional forms

- (a)** 75% Joint and Survivor Annuity - a reduced amount of pension is payable to the retired participant during his lifetime with the provision that after his death 75% of such reduced benefit shall continue to and for the lifetime of his eligible surviving spouse.
 - (b)** Five Year Certain and Life Annuity (for benefits commencing on or after January 1, 2011) A reduced pension is payable to the retired participant during his lifetime, with the provision that if his death occurs before he has received 60 monthly payments, such payments will continue to his designated beneficiary until a total of 60 monthly payments have been made.
- (3)** Lump sum - payable if the actuarially equivalent present value of the vested accrued benefit is \$2,500 or less, subject to PBGC approval.

**BINDERY INDUSTRY EMPLOYERS
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(N) Suspension of benefits

The retirement benefit otherwise payable to a pensioner shall be permanently suspended for each calendar month in which the pensioner completes 40 or more hours of service in the bookbinding industry, in an occupation in which the pensioner was employed at any time under the plan, and in the geographic area covered by the plan (as defined in Department of Labor Regulations Section 2530.203-3) at the time payment of benefits to the pensioner commenced.

(O) Increases for retired participants

- (1) Effective October 1, 1987 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on October 1, 1987 received a 10% increase in his monthly benefit.
- (2) Effective January 1, 1992 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 1992 received a 10% increase in his monthly benefit.
- (3) Effective January 1, 2002 - Each retired participant and beneficiary who had retired and was receiving a retirement pension on January 1, 2002 received a 5% increase in his monthly benefit.

(P) Changes in plan provisions since January 1, 2020

Effective April 1, 2020, the plan became insolvent and pension benefit amounts, as needed, were reduced to the PBGC guaranteed benefit level.

REHABILITATION PLAN FOR THE BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN

**Originally Adopted by the Trustees on November 26, 2010
Amended and Revised December 14, 2012
Amended and Revised December 15, 2014
Amended and Revised October 18, 2017**

I. Introduction

As required by the Employee Retirement Income Security Act (“ERISA”) as amended by the Pension Protection Act of 2006 (“PPA”), the actuary of the Bindery Industry Employers GCC/IBT Pension Fund (“Fund”) certified that the Fund was in Critical Status for each of the Plan Years beginning January 1 of 2010 through 2014, and Critical and Declining Status for January 1 of 2015, 2016 and 2017.

In April of each of the Plan Years that the Fund was in Critical Status or Critical and Declining Status, the Board of Trustees sent a Notice of Critical Status or Notice of Critical and Declining Status, advising, in part, that (1) the Fund was in Critical Status or Critical and Declining Status; (2) adjustable benefits may be reduced or eliminated as part of a rehabilitation plan adopted by the Fund; and (3) employers participating in the Fund (“Employers”) were obligated to pay a 5% contribution surcharge to the Fund, which became effective for shifts worked on and after May 1, 2010. The 5% surcharge was increased to 10% effective for shifts worked on and after January 1, 2011 and continues until the earlier of (1) the date a collective bargaining agreement (“CBA”) is negotiated for the Employer that is consistent with the Current Benefit Schedule or the Default Schedule of the Rehabilitation Plan, as amended from time to time; or (2) the date the Default Schedule becomes effective with respect to an Employer if the bargaining parties fail to agree on the Schedule to be applied.

Under PPA, the Fund generally will be considered to have emerged from Critical Status when the Fund actuary certifies that the Fund is not projected to have an accumulated funding deficiency for the current Plan Year or any of the subsequent nine (9) Plan Years, using specified actuarial assumptions. Generally, the Fund must emerge from Critical Status by the end of its 10-year Rehabilitation Period, as defined under PPA. The Fund’s Rehabilitation Period began on January 1, 2013 and will end on December 31, 2022.

The Board of Trustees originally adopted this Rehabilitation Plan on November 26, 2010 and timely notified the Employers and Locals 14-M and 4-C (“Union” or “Unions”). The Rehabilitation Plan and contribution schedules were based on the Fund information as of January 1, 2010 and on reasonable assumptions about how the Fund’s assets and liabilities will change in the coming years, particularly as a result of changes in the Fund’s investment returns, which are dependent on the financial markets. The Board of Trustees determined that, based on reasonable actuarial assumptions and upon exhaustion of all reasonable measures, the Fund is not reasonably expected to emerge from Critical Status by the close of the Fund’s Rehabilitation Period. Therefore, the Rehabilitation Plan consisted of reasonable measures designed to avoid possible insolvency that could be reviewed annually and updated, as needed, to reflect the experience of the Plan, as required by the PPA.

The original Rehabilitation Plan included the elimination of adjustable benefits including (i) the five year benefit guarantee for the single life annuity, and (ii) the disability retirement benefit, both effective for participants who retire on or after January 1, 2011. It also included two contribution schedules, the Current Benefit Schedule and the Default Schedule, both of which required additional employer contributions to the Plan.

The original Rehabilitation Plan was applicable for collective bargaining agreements renewed or extended after November 26, 2010.

The Trustees reviewed the Rehabilitation Plan in 2011 and, after consulting with the Fund's actuary, they agreed not to make any changes at that time.

The Rehabilitation Plan was again reviewed in 2012 and the Trustees adopted an updated Rehabilitation Plan on December 14, 2012, as described in section II below.

The Trustees reviewed the amended Rehabilitation Plan in 2013 and, after consulting with the Fund's actuary, they agreed not to make any changes at that time.

The amended Rehabilitation Plan was again reviewed in 2014. After consulting with the Fund's actuary, the Trustees agreed not to make any changes to the Benefit and Employer Contribution Schedules under the amended Rehabilitation Plan described in section II below. However, the PPA requires a pension plan to set forth annual standards for meeting the requirements of its rehabilitation plan, but it does not currently define the standards applicable to a rehabilitation plan, such as the Fund's extended Rehabilitation Plan, that is not designed to emerge from Critical Status by the end of the 10-year Rehabilitation Period. However, defining the method of measuring scheduled progress in the Rehabilitation Plan would clearly disclose the basis for measuring progress. At a meeting of the Board of Trustees held on October 3, 2014, the Fund's actuary discussed annual standards that could be used for measuring the Fund's scheduled progress under the Rehabilitation Plan. On December 12, 2014, the Fund's actuary recommended an annual standard to the Board of Trustees to be used for measuring the Fund's scheduled progress under the Rehabilitation Plan which provided that, effective with scheduled progress certifications due on or after March 31, 2015, updated actuarial projections each year, based on reasonable assumptions, will show that, under the Rehabilitation Plan (as amended from time to time), the Fund's projected insolvency will not occur before May 2020, the projected insolvency date as of the first day of the Fund's Rehabilitation Period. The Board of Trustees adopted the recommended annual standard on December 15, 2014.

The Trustees reviewed the amended Rehabilitation Plan in 2015 and 2016 and, after consulting with the Fund's actuary, they agreed not to make any changes at that time.

The amended Rehabilitation Plan was again reviewed in 2017. After consulting with the Fund's actuary, the Trustees agreed not to make any changes to the Benefit and Employer Contribution Schedules under the amended Rehabilitation Plan described in section II below. At a meeting of the Board of Trustees on October 18, 2017, the Fund's actuary reviewed and recommended a change to the annual standard used for measuring the Fund's scheduled

progress under the Rehabilitation Plan to provide that, effective with scheduled progress certifications due on or after March 31, 2018, updated actuarial projections each year will show that the Fund's projected insolvency will not occur before the Plan Year beginning January 1, 2020. The Board of Trustees adopted this change to the annual standard on October 18, 2017. See attached "Resolution Confirming Adoption of Amended Rehabilitation Plan." This annual standard is described in section III below.

The Board of Trustees has the sole discretion to amend and construe this Rehabilitation Plan, including the Schedules. All capitalized terms shall have the same meaning as defined in the Bindery Industry Employers GCC/IBT Pension Plan (the "Plan"), unless otherwise indicated.

II. Benefit/Contribution Schedules effective on and after January 1, 2013

A. General Information

The Current Benefit Schedule and the Default Schedule described in this amended Rehabilitation Plan were provided to the Unions and Employers on January 11, 2013, after the Board of Trustees adopted the amended Rehabilitation Plan on December 12, 2012. Until either the Current Benefit Schedule or the Default Schedule takes effect with respect to an Employer, the contribution rates in the current CBA continue to apply. The statutory surcharges under Code Section 432(e)(7) apply unless the contribution rates in the CBA or the default schedule meet the requirements of the Rehabilitation Plan. The Board of Trustees will send updated Schedules to the Unions and the Employers, as required by law. Any new CBA entered into by the Union and an Employer calling for participation in the Fund must reflect the terms of either the most recently issued Current Benefit Schedule or the Default Schedule. The Schedule will become effective as of the date agreed upon by the Union and Employer to the extent permitted by law. If the Union and Employer cannot reach agreement as to the Schedule that will apply to the Employer's participating Employees, the Default Schedule will become effective as of the date required by law.

B. Provisions of the Rehabilitation Plan Amended as of December 14, 2012

- 1. Background.** The original Rehabilitation Plan was reviewed in 2012 based on the Fund information as of January 1, 2012 and the projections of the Fund's assets and liabilities based on reasonable assumptions. In particular, the impact of changes in the Fund's future investment returns on the Plan's projected funded status was reviewed.

After review of additional alternative rehabilitation plans prepared by the Fund's actuary, the Board recognized that the Rehabilitation Plan may not be able to avoid insolvency but that it may only be able to forestall insolvency under all of the circumstances discussed and considered, including but not limited to National Publishing Company's stated intention to withdraw from the Plan in the absence of a modified Rehabilitation Plan with no contribution cost increase. Therefore, the Board agreed to amend the Rehabilitation Plan adopted on October 26, 2012, to keep

the current contribution rates in place for all contributing employers and to maintain the current \$14.00 benefit accrual rate, pending further review while the Board considers all reasonable measures, including but not limited to partitioning bankrupt employers and other relief that may be available through petition with the PBGC in an effort to emerge from Critical Status or, if that is not possible, to significantly improve its funded status and avoid insolvency. After consulting with the Fund's actuary, on December 14, 2012, the Trustees adopted new Employer Contribution Schedules which are applicable for collective bargaining agreements renewed or extended after December 14, 2012.

2. Employer Contribution Schedules

A. Current Benefit Schedule - The Current Benefit Schedule provides the contribution rates in effect for the 2012 Plan Year (calendar year) for each Contributing Employer will continue to be in effect on and after January 1, 2013, i.e., \$5.50 for National Publishing Company and \$6.55 for all other contributing Employers.

Benefits will continue to accrue based on the Plan, as it is currently in effect.

B. Default Schedule - The Default Schedule is required pursuant to Code Section 432(e)(1) and provides the contribution increases needed after future benefit accruals have been reduced to the maximum extent permitted by law, i.e., the current monthly benefit accrual rate of \$14.00 is reduced to \$13.00 per year of future credited service. The following contribution rate increases will apply to Employers that adopt the Default Schedule. If the Union and an Employer do not reach an agreement as to the Schedule that will apply to the Employer's participating employees within 180 days after the expiration of the CBA, the Default Schedule will become effective as required by law.

<u>Effective Date of Increase</u>	<u>Amount of Increase Per Shift</u>	<u>Increased Contribution Rate</u>
January 1, 2012		\$ 6.51
January 1, 2013	\$1.06	\$ 7.57
January 1, 2014	\$1.06	\$ 8.63
January 1, 2015	\$1.06	\$ 9.69
January 1, 2016	\$1.06	\$10.75
January 1, 2017	\$1.06	\$11.81
January 1, 2018	\$1.06	\$12.87
January 1, 2019	\$1.06	\$13.93
January 1, 2020	\$1.06	\$14.99
January 1, 2021	\$1.06	\$16.05
January 1, 2022	\$1.06	\$17.11

Until the Default Schedule takes effect with respect to an Employer, the contribution rate in effect on January 1, 2012, plus any required surcharge, continues to apply.

III. Annual Review and Updated Rehabilitation Plan Standards *(as amended October 18, 2017)*

In consultation with the Fund's actuary, the Board of Trustees, as required by law, will review the Rehabilitation Plan annually and amend it, as appropriate, to meet the objective of enabling the Fund to continue making progress toward forestalling or avoiding insolvency to the extent reasonably possible. The annual review will include a thorough review of the Fund's funding status, including projections by the actuary of whether and when the Fund is expected to become insolvent.

The PPA requires the Fund to set forth annual standards for meeting the requirements of its Rehabilitation Plan. However, the PPA does not currently define the standards applicable to a Rehabilitation Plan, such as this extended Rehabilitation Plan, that is not designed to emerge from Critical Status by the end of the 10-year Rehabilitation Period.

Until such time as these standards are more clearly defined pursuant to the PPA, the annual standard for measuring the Fund's scheduled progress under the extended Rehabilitation Plan, effective with scheduled progress certifications due on or after March 31, 2018, is for updated actuarial projections each year to show, based on reasonable assumptions, that under the Rehabilitation Plan (as amended from time to time), the Fund's projected insolvency will not occur before the Plan Year beginning January 1, 2020.

The Rehabilitation Plan may be amended for any benefit changes that may be required for the Plan to continue to satisfy all necessary legal requirements, to maintain its tax-qualified status under the Code, and to comply with other applicable law. Collective bargaining agreements that are entered into, renewed or extended after the date of any changes to the Rehabilitation Plan will be subject to the Rehabilitation Plan then in effect at the time of such entry, renewal or extension. Notwithstanding the foregoing, under current law, the schedules of contribution rates provided by the Board, and agreed to by the bargaining parties in negotiating a collective bargaining agreement, will remain in effect for the duration of that collective bargaining agreement.

IV. Construction and Modifications to this Rehabilitation Plan

The Board reserves the right, in its sole and absolute discretion, to construe, interpret and/or apply the terms and provisions of this Rehabilitation Plan in a manner that is consistent with the PPA and other applicable law. Any and all constructions, interpretations and/or applications of the Plan (and other Plan documents) or the Rehabilitation Plan by the Board, in its sole and absolute discretion, shall be final and binding on all parties affected thereby. Subject to the PPA and other applicable law, and notwithstanding anything herein to the contrary, the Board further reserves the right to make any modifications to this Rehabilitation Plan that they, in their sole and absolute discretion, determine are necessary and/or appropriate (including, without limitation in the event of any omission or the issuance of any future legislative, regulatory, or judicial guidance).

**RESOLUTION CONFIRMING ADOPTION OF AMENDED REHABILITATION PLAN
FOR THE
BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
FOR THE 2017 PLAN YEAR**

WHEREAS, pursuant to Section 305 of the Employee Retirement Income Security Act (“ERISA”) as amended by the Pension Protection Act of 2006 (“PPA”), the Bindery Industry Employers GCC/IBT Pension Plan (“Fund”) was certified to be in Critical Status for each of the Plan Years beginning January 1, 2010 through January 1, 2014 and Critical and Declining Status for January 1, 2015 through January 1, 2017; and

WHEREAS, the PPA requires pension plans in Critical and Critical and Declining Status to adopt a Rehabilitation Plan aimed at restoring the financial health of the plan and review and update, as necessary, such Rehabilitation Plan annually; and

WHEREAS, the Board of Trustees adopted the original Rehabilitation Plan effective November 26, 2010 and Amended Rehabilitation Plans effective December 14, 2012 and December 15, 2014; and

WHEREAS, at a meeting of the Board of Trustees held on October 18, 2017, the Fund’s actuary reviewed the annual standard used for measuring the Fund’s scheduled progress under the Rehabilitation Plan as specified in the amended Rehabilitation Plan; and

WHEREAS, the Fund’s actuary recommended a change to the annual standard to the Board of Trustees on October 18, 2017.

NOW THEREFORE, this is to confirm that, on October 18, 2017, the Board of Trustees approved the Fund actuary’s recommendation of the annual standard to be used for measuring the Fund’s scheduled progress under the Rehabilitation Plan for plan years beginning on or after January 1, 2017 as follows:

“The annual standard for measuring the Fund’s scheduled progress under the Rehabilitation Plan, effective with scheduled progress certifications due on or after March 31, 2018, is for updated actuarial projections each year to show, based on reasonable assumptions, that under the Rehabilitation Plan (as amended from time to time), the Fund’s projected insolvency will not occur before the Plan Year beginning January 1, 2020.”

Date:

10/18/17



John Potts
Union Trustee

Date:

10-18-17



Rebecca Robertson
Employer Trustee

**BINDERY INDUSTRY EMPLOYERS GCC/IBT
PENSION PLAN**

AMENDED AND RESTATED JANUARY 1, 2014

BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
(Amended and Restated January 1, 2014)

PREAMBLE

WHEREAS, the Bookbinders Multiemployer Group (“BMEG”), a division of Graphic Arts Association (“Association”) and Graphic Communications International Union Local 2-B (“Local 2-B”) had previously executed a Collective Bargaining Agreement which, among other things, provided for payment of money into a jointly-administered trust fund by Employers represented by BMEG to provide pension benefits for certain employees in collective bargaining units represented by Local 2-B; and

WHEREAS, BMEG and the Association no longer represent Employers in collective bargaining with Local 2-B; and

WHEREAS, Local 2-B is no longer in existence and certain of its members are now represented by Graphic Communications Conference of the International Brotherhood of Teamsters, Local 4-C (*formerly Graphic Communications International Union Local 4-C*) and Graphic Communications Conference of the International Brotherhood of Teamsters, Local 14-M (*formerly Graphic Communications International Union Local 14-M*) (both Locals hereinafter referred to as the “Union”); and

WHEREAS, effective May 1, 1999, the Plan was amended to eliminate the Association as a party to the Plan and provide for the continued administration of the Plan by an equal number of members of the Board of Trustees appointed by the Contributing Employers and the Union; and

WHEREAS, the pension plan previously known as Bookbinders Multiemployer Group-Graphic Communications International Union Local 2-B Pension Plan, originally established on January 1, 1962, changed its name to Bindery Industry Employers/GCIU Pension Plan and then subsequently to Bindery Industry Employers GCC/IBT Pension Plan (“Plan”) effective January 1, 2006; and

WHEREAS, the Plan provides that it may be amended at any time by the Board of Trustees (“Trustees”); and

WHEREAS, the Plan was amended and restated in its entirety on March 2, 1977, effective January 1, 1976 (“First Amendment and Restatement”); June 17, 1986, effective January 1, 1984 (“Second Amendment and Restatement”); December 12, 1994, effective January 1, 1994 (“Third Amendment and Restatement”); December 13, 2001, effective January 1, 1995 (“Fourth Amendment and Restatement”); and December 22, 2009, effective January 1, 2009; and

WHEREAS, the Board of Trustees now desires to amend and restate the Plan to incorporate all of the amendments to date and to comply with the requirements of the Pension Protection Act of 2006, the Worker, Retiree and Employer Recovery Act of 2008, the Heroes Earnings Assistance and Relief Tax Act of 2008, the Pension Relief Act of 2010, and other applicable laws and regulations.

WHEREAS, the Plan is intended to meet the requirements of the Internal Revenue Code of 1986, as amended, and the Employee Retirement Income Security Act of 1974, as amended.

NOW THEREFORE, effective January 1, 2014, or such other dates applicable to certain sections of the Plan as may be set forth therein or in any prior amendment, the Plan is hereby amended and restated as follows.

The rights and benefits of any Participant who terminated service prior to the effective date of this amendment and restatement shall be determined in accordance with the prior provisions of the Plan, as in effect on the date of such termination.

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ARTICLE I

DEFINITIONS

Section 1.1 “Accrued Benefit” or “Accrued Monthly Pension” shall mean the monthly Retirement Benefit of each Participant computed as of his Retirement Date or any earlier date in accordance with Article V.

Section 1.2 “Actuarial Equivalent” shall mean equality in the value of aggregate amounts expected to be received under different forms of payment computed on the basis of 7% interest and the UP-1984 Mortality Table (Unisex) with no age setback for the Participant and with ages setback five (5) years for a Beneficiary.

For determining actuarial equivalence for purposes of a lump sum distribution on or after January 1, 2000, the present value shall be based upon the rate of interest and mortality rates specified below:

- (i) For distributions paid prior to December 31, 2002, using the Applicable Mortality Table as prescribed by the Secretary of the Treasury pursuant to Section 417(e)(3) of the Code, and for distributions paid on or after December 31, 2002, using the Applicable Mortality Table pursuant to Revenue Ruling 2001-62; and
- (ii) using the Applicable Interest Rate equal to the annual rate of interest on 30-year Treasury Securities. For this purpose, the annual rate shall be determined as of the month which is two (2) months prior to the first day of the Plan Year, so that the “look back month” described in Regulation §1.417(e)-1 shall be November. The Applicable Interest Rate shall remain constant for one Plan Year, so that the “stability period” described in Regulation §1.417(e)-1 shall be one Plan Year.

For distributions made on or after January 1, 2008, the lump sum shall not be less than the amount computed using the “Applicable Mortality Table” and “Applicable Interest Rate” as described below:

- (i) The “Applicable Mortality Table” shall mean the table prescribed by the Secretary of the Treasury under Code Section 417(e)(3)(B) applicable for the calendar year in which the stability period specified in (ii) below begins, as published by the Internal Revenue Service in revenue rulings, notices or other guidance.
- (ii) The “Applicable Interest Rate” shall mean the interest rate described in Code Section 417(e)(3), as amended by the Pension Protection Act of 2006, which is defined as the adjusted first, second and third segment rates, as specified by the Commissioner for the second month (“lookback month”) preceding the Plan Year (“stability period”). For this purpose, the segment rates are the spot segment rates that would be determined for the applicable month under Code Section 430(h)(2)(C) without the 24-month averaging under Code Section 430(h)(2)(D), and determined without regard to the adjustment for the 25-year average segment rates provided in Section 430(h)(2)(C)(iv) of the Code. For distributions with Annuity Starting Dates occurring during plan years beginning on or

after January 1, 2008 and before January 1, 2012, these segment rates are adjusted by blending with the rate of interest for 30-year Treasury securities under the transition percentages specified in Code Section 417(e)(3)(D)(iii).

Effective January 1, 2008, the Applicable Mortality Table and Applicable Interest Rate in this paragraph will also apply for adjusting benefits in determining the maximum benefit limitations under Article XI.

Section 1.3 “Actuary” shall mean the individual or firm selected by the Trustees to provide actuarial services in connection with the administration of the Pension Plan.

Section 1.4 “Annuity Starting Date” shall mean the first day of the first period for which an amount is payable as an annuity, or, in the case of a benefit not payable in the form of an annuity, the first day on which all events have occurred which entitles the Participant to such benefit.

Section 1.5 “Beneficiary” shall mean a person or persons designated by a Participant or Pensioner to receive any Plan benefits becoming payable upon the death of the Participant or Pensioner. In the absence of such designation, or in the event all such person or persons so designated are not living, “Beneficiary” means the estate of such Participant or Pensioner. Such designation shall be made on the form and in the manner prescribed by the Trustees and may be revised or replaced at any time by the Participant or Pensioner.

Section 1.6 “Board of Trustees” or “Board” shall mean the Board comprised of individuals appointed as Employer-designated Trustees and Union-designated Trustees, as provided for in the Trust Agreement, or their successors; such Board has the authority to amend, operate and administer the Plan.

Section 1.7 “Code” shall mean the Internal Revenue Code of 1986, as subsequently amended.

Section 1.8 “Collective Bargaining Agreement” shall mean any labor agreement, as amended from time to time, between a Covered Employer and the Union representing Employees of such Employer whereby the Employer is obligated to make Contributions to the Trust Fund.

Section 1.9 “Contributions” shall mean payments made to the Trust Fund by the Employers pursuant to the Collective Bargaining Agreement with the Union in effect from time to time, or pursuant to any other written Agreement to make contributions.

Section 1.10 “Covered Employer” or “Contributing Employer” shall mean the following Employers:

- (a) any Employer who has a Collective Bargaining Agreement with the Union which requires periodic contributions to the Pension Fund and who, in writing, adopts and agrees to be bound by the provisions of the Trust Agreement, or who makes contributions to the Fund as required by the Collective Bargaining Agreement or by the Trust Agreement, or any other written agreement; and
- (b) the Union for the purpose of making the required contributions to the Fund, on behalf of the employees of the Union.

An Employer shall be considered to become a Covered Employer at the beginning of the first day on which any Employee is employed by him in Covered Employment.

Section 1.11 “Covered Employment” shall mean any employment in a capacity for which Employer Contributions are payable to the Trust Fund in accordance with a Collective Bargaining Agreement or other written agreement, including employment with the Union and/or the Predecessor Union.

Section 1.12 “Credited Service” shall mean that part of a Participant’s Service in Covered Employment that is used to calculate benefits under the Plan. Credited Service is more fully defined in Article III.

Section 1.13 “Early Retirement Date” shall mean the first day of the month on or following the date a Participant attains his 55th birthday and completes five (5) years of Service but prior to his Normal Retirement Date.

Section 1.14 “Effective Date” of this amendment and restatement of the Pension Plan shall mean January 1, 2014. The original effective date of the Pension Plan was January 1, 1962.

Section 1.15 “Employee” shall mean:

- (a) any Employee of an Employer engaged in work covered by a Collective Bargaining Agreement between such Employer and the Union;
- (b) any Employee of the Union who was employed by the Predecessor Union and who is paid on a salaried basis and who was previously employed by an Employer and for whom contributions to the Plan are required to be made by the Union (“Union Employee”);
- (c) any bindery foreman of an Employer who is a member of the Union, but who is not covered under the Collective Bargaining Agreement, for whom contributions, with the consent of the Board of Trustees, are made to the Plan by an Employer; and
- (d) any Employee of the Union who was employed by the Predecessor Union and who is paid on a salaried basis and who was employed by the Predecessor Union on or after January 1, 1991 and for whom contributions to the Plan are required to be made by the Union.

Section 1.16 “Employers” shall mean the Employers having Employees covered by the Plan and who are required to make contributions to the Plan pursuant to a Collective Bargaining Agreement. Except for purposes of representation on the Board or where the context clearly indicates otherwise, Employers also includes the Union in its capacity as an employer to its Employees. “Employer” shall mean any one of such Employers.

Section 1.17 “ERISA” shall mean the Employee Retirement Income Security Act of 1974, as amended, and any regulations or rulings as may from time to time be promulgated pursuant to its provisions.

Section 1.18 “Hour of Service” shall mean:

- (a) each hour for which an Employee is paid or entitled to payment for the performance of duties for the Employer; and
- (b) each hour for which an Employee is paid or entitled to payment by the Employer on account of the period of time during which no duties are performed due to vacation, holiday, illness, jury duty, or leave of absence. Hours under this paragraph shall be credited pursuant to §2530.200(b)-2(b) and (c) of the Department of Labor regulations which are incorporated herein by this reference; and
- (c) each hour for which back pay, irrespective of mitigation of damages, has either been awarded or agreed to by the Employer. The same hours of service shall not be credited both under paragraph (a) and paragraph (b), as the case may be, and under this paragraph (c). These hours shall be credited to the Employee for the computation period or periods to which the award or agreement pertains rather than the computation period or periods in which the award, agreement, or payment is made.
- (d) Notwithstanding any provision in the Plan to the contrary, effective December 12, 1994, Hours of Service with respect to qualified military service shall be provided in accordance with Code Section 414(u).

Section 1.19 “Joinder” shall mean the instrument executed by and between each Employer and the Board setting forth the conditions of such Employer’s participation in the Plan.

Section 1.20 “Normal Retirement Date” shall mean the first day of the month coincident with or next following the Participant’s Normal Retirement Age, which is the later of (1) the date on which he attains age 65, or (2) the fifth anniversary of the time he commenced participation in the Plan.

Section 1.21 “Participant” shall mean any Employee who meets the requirements for participation in this Pension Plan as set forth in Article II, a former Employee who has a nonforfeitable right to receive a Retirement Benefit, and a Pensioner, Beneficiary or surviving Spouse during the period of receipt of benefit payments from the Plan.

Section 1.22 “Pension Plan” or “Plan” shall mean the Bindery Industry Employers GCC/IBT Pension Plan as described herein or as from time to time hereafter amended.

Section 1.23 “Pensioner” shall mean a Participant who has retired and who is receiving a Retirement Benefit under this Pension Plan.

Section 1.24 “Plan Year” shall mean the period of twelve (12) consecutive months from January 1 through December 31.

Section 1.25 “Predecessor Union” shall mean the Graphic Communications International Union Local 2-B.

Section 1.26 “Prior Plan” shall mean the Bindery Industry Employers GCC/IBT Pension Plan (formerly known as (1) the Bindery Industry Employers/GCIU Pension Plan and (2) the Bookbinders Multiemployer Group-Graphic Communications International Union Local 2-B Pension Plan) as amended from time to time through December 31, 2013.

Section 1.27 “Qualified Joint and Survivor Annuity” shall mean an annuity for the life of the Participant, with a survivor annuity payable for the life of the Participant’s Spouse which is 50% of the annuity which is payable during the joint lives of the Participant and his Spouse, and which is the Actuarial Equivalent of a single life annuity for the life of the Participant.

Section 1.28 “Regular Time Hours” shall mean Hours of Service, except hours for which a premium rate is paid because such hours are in excess of the standard workweek set forth in the Collective Bargaining Agreement.

Section 1.29 “Retirement Benefit” shall mean one of a series of annual payments, 1/12th of which is paid monthly to a Pensioner, surviving Spouse or Beneficiary under the Plan beginning on the specified date of Normal, Early, or Disability Retirement.

Section 1.30 “Service” shall mean the completed years and any fractional part of a Participant’s employment by any Employer whether or not continuous; provided, however, the determination of any Participant’s Service shall be subject to the rules in Article III.

Section 1.31 “Spouse” shall mean the individual to whom the Participant is lawfully married under any state law. Effective June 26, 2013, this definition includes an individual of the same sex legally married to the Participant in a state or legal jurisdiction that recognizes such marriages, even if they reside in a domestic or foreign jurisdiction that does not recognize the validity of same-sex marriages. Lawfully married does not include civil union, domestic partnerships, or any other status unless such status is fully equivalent to marriage under the laws of the issuing state. A former Spouse will be treated in the same manner as a Spouse to the extent provided under a qualified domestic relations order as prescribed in Code Section 414(p).

Section 1.32 “Trust Agreement” shall mean the Agreement and Declaration of Trust, together with any amendments hereto thereafter adopted.

Section 1.33 “Trust Fund” or “Fund” shall mean the Bindery Industry Employers GCC/IBT Pension Fund, as provided by the Trust Agreement.

Section 1.34 “Trustees” shall mean the Employer Trustees and the Union Trustees collectively, as named in the Trust Agreement or as constituted from time to time in accordance with the provisions of the Trust Agreement.

Section 1.35 “Union” shall mean Graphic Communications Conference of the International Brotherhood of Teamsters (“GCC/IBT”), Local 4-C and Local 14-M, as successors to Graphic Communications International Union Local 2-B.

Section 1.36 “Vested Accrued Benefit” or “Vested Accrued Monthly Pension” shall mean the Accrued Benefit of each Participant to which such Participant has earned a nonforfeitable right to part or all of the benefit as determined by the vesting schedule provided in Section 4.4.

ARTICLE II

ELIGIBILITY FOR PARTICIPATION

Section 2.1 Eligibility Requirements. Each Employee shall automatically become a Participant in the Plan upon satisfying the following applicable requirements:

- (a) Any Employee who, on December 31, 1975, was considered a Participant in the Plan in accordance with the terms of the Plan then in effect, continued as a Participant in the Plan.
- (b) Any other Employee who is employed on or after January 1, 1976:
 - (i) in the case of an Employee who is a Journeyman Bookbinder or a Union Employee, he shall become a Participant as of the date he commences Covered Employment;
 - (ii) in the case of all other Employees, they shall become Participants on the first day of the month immediately following the date such Employee completes one (1) year of Service with an Employer during the Eligibility Computation Period, as provided in Article III, Section 3.2.

Section 2.2 Rehired Employee. Upon the reemployment of any Employee, the following rules shall apply in determining his eligibility to participate in the Plan:

- (a) If the reemployed Employee was a Participant in the Plan during his prior period of employment and was entitled to a Deferred Vested Benefit at the time of his termination of employment, he shall be immediately eligible to resume participation in the Plan. If the reemployed Employee was not a Participant in the Plan during his prior period of employment, or if he was a Participant, but was not entitled to a Deferred Vested Benefit at the time of his termination of employment, he shall be considered a new Employee for eligibility purposes subject to the possible reinstatement of prior Service under Section 2.2 (b) below.
- (b) If the reemployed Employee had completed Service during his prior period of employment, such Service shall be automatically reinstated for eligibility purposes as of the date of his reemployment unless the Employee incurred a Break in Service, in which case his prior years of Service shall be reinstated only if the number of his consecutive one year Breaks in Service is less than the greater of five (5), or the aggregate number of his years of Service prior to the Break in Service. If such reemployed Employee's Service before his termination of employment may not be disregarded pursuant to the preceding sentence, he shall be immediately eligible to participate in the Plan upon reemployment.

ARTICLE III

SERVICE CREDITS

Section 3.1 Service. The term "Service" shall mean the completed years and any fractional part of a Participant's employment by any Employer whether or not continuous; provided, however, the determination of any Participant's Service will be subject to the following rules:

- (a) The Plan shall determine Service to be credited to a Participant on the basis of Regular Time Hours, as defined in Section 1.28, and shall determine the number of Regular Time Hours to be credited to a Participant in a computation period on the basis of shifts, subject to the following rules:
 - (i) 750 Regular Time Hours shall be treated as equivalent to 1,000 Hours of Service and 375 Regular Time Hours are treated as equivalent to 500 Hours of Service.
 - (ii) Each Participant shall be credited with the number of Regular Time Hours included in a shift for each shift for which the Participant would be credited with at least one Regular Time Hour.
 - (iii) The number of Regular Time Hours included in each shift shall be 7-1/4 and the times of the beginning and end of each shift used as a basis for the determination of Service are set forth in the Collective Bargaining Agreement.
 - (iv) Regular Time Hours shall be credited to computation periods in accordance with the rules for crediting Hours of Service to computation periods set forth in §2530.200b-2(c) of Part 2530 of Chapter XXV of the Code of Federal Regulations which are incorporated herein by reference.
- (b) Notwithstanding the foregoing, any Service prior to January 1, 1976 shall be disregarded if such Service would have been disregarded under the rules of the Plan with regard to Breaks in Service as in effect on the applicable date.
- (c) If a Participant is entitled to a Deferred Vested Benefit at the time he incurs a Break in Service, any period of service with an Employer prior to such Break in Service will be considered as Service under the Plan upon the subsequent reemployment of such Participant.
- (d) If a Participant is not entitled to a Deferred Vested Benefit at the time he incurs a Break in Service, he shall, nevertheless, retain any Service he has accrued under the Plan until the end of a period of time when the number of consecutive one (1) year Breaks in Service equals the greater of five (5) or his number of years of Service, but such years of Service shall be cancelled and disregarded at the end of such period of time if he has not prior thereto returned to the employment of an Employer.

- (e) Notwithstanding the foregoing, any Service of a Participant who is a bindery employee and who elected not to participate in the Plan on January 1, 1962, but commenced participation in the Plan on January 1, 1970, shall be disregarded for the period January 1, 1962 to December 31, 1969.

Section 3.2 Vesting and Eligibility Service Credit. Service is credited for the purpose of determining a Participant's benefit and vesting eligibility as follows:

- (a) If, in any Eligibility Computation Period or Vesting Computation Period, a Participant is credited with at least 750 Regular Time Hours, the equivalent of 103 shifts, he will be considered as having completed one year of Service during such computation period. Regular Time Hours credited in excess of 750 hours during such computation period will not entitle the Participant to any additional Service for the current or any other Eligibility or Vesting Computation Period.
- (b) **Eligibility Computation Period.** For purposes of determining years of Service and Breaks in Service for purposes of eligibility, the initial Eligibility Computation Period shall be the twelve (12) consecutive month period beginning with the date on which an Employee first performs an Hour of Service for an Employer ("employment commencement date") and each anniversary thereof. If an Employee incurs a Break in Service and is reemployed by an Employer, a new Eligibility Computation Period shall be established and shall mean the twelve (12) consecutive month period beginning with the date on which the Employee first performs an Hour of Service for an Employer following his Break in Service ("reemployment commencement date") and subsequent twelve (12) consecutive month periods beginning on anniversaries of the reemployment commencement date. Years of Service and Breaks in Service shall be measured by the same Eligibility Computation Period.
- (c) **Vesting Computation Period.** For purposes of determining years of Service and Breaks in Service for purposes of computing a Participant's nonforfeitable vested percentage of his Accrued Monthly Pension, the Vesting Computation Period shall be the Plan Year.

Section 3.3 Credited Service. Credited Service for the purpose of calculating a Participant's Accrued Benefit on any given date is the sum of his years of Prior Credited Service, if any, and his years of Prospective Credited Service, if any, determined as of such given date, as follows:

- (a) **"Prior Credited Service"** is defined only for an Employee who was a Participant on December 31, 1975 and who had Credited Service under the Plan as then in effect and means in the case of such Employee the number of years of Credited Service he had under the Plan on December 31, 1975 determined according to the terms and provisions of the Plan in effect on that date; provided, however, if a Participant's last day of Covered Employment is on or after January 1, 1992, and if such Participant was first included in the Plan in 1970 ("1970 plan participant"), such 1970 plan participant shall receive additional Prior Credited Service for the period January 1, 1962 to December 31, 1969, up to a maximum of five (5) years.

- (b) **“Prospective Credited Service”** shall mean that portion of a Participant’s Credited Service attributable to the period beginning on or after January 1, 1976; provided, however, no credit for Prospective Credited Service shall be given until a Participant has completed two (2) continuous years of Service. Prospective Credited Service will be measured in terms of Regular Time Hours completed while in Covered Employment during a Plan Year with the provision that one (1) year of Prospective Credited Service will be given if the Participant completes at least 220 shifts (i.e., the equivalent of 1,595 Regular Time Hours) in Covered Employment during such Plan Year. If the Participant completes less than 220 shifts during a Plan Year, Prospective Credited Service will be reduced by one-tenth (1/10th) of a year for each twenty-two (22) shifts (i.e., the equivalent of 159-1/2 Regular Time Hours) completed less than 220 shifts during such Plan Year.

In no event shall a Participant be entitled to more than thirty-five (35) years of Credited Service with respect to Credited Service prior to January 1, 1988.

Section 3.4 Break in Service. A Participant who does not complete at least 60 shifts (i.e., the equivalent of 435 Regular Time Hours) in Covered Employment during two (2) consecutive Plan Years, provided that in either of said two (2) consecutive Plan Years such Participant does not complete at least 52 shifts (i.e., the equivalent of 377 Regular Time Hours), in any Plan Year beginning on or after January 1, 1976 shall suffer a Temporary Break in Service. However, a Participant shall not incur a Temporary Break in Service for the calendar year in which he becomes a Participant, dies, retires or suffers total and permanent disability. Further, solely for the purpose of determining whether a Participant has incurred a Temporary Break in Service, the following exceptions apply:

- (a) If a Participant is absent from work on account of military service in the armed forces of the United States while at war or during any period of compulsory military service (original enlistment only) and returns to work in Covered Employment within 90 days after his discharge and earns at least one year of Prospective Credited Service following his return, he shall not incur a Break in Service and he shall receive credit for a maximum of three (3) years of Prospective Credited Service during such period of absence, provided, however, notwithstanding the foregoing provision, contributions, benefits and service credit with respect to qualified military service shall be provided according to Section 414(u) of the Code.
- (b) If a Participant is absent from work on account of sickness or accident and returns to work in Covered Employment and earns at least one (1) year of Prospective Credited Service following his return, he shall not incur a Break In Service and he will receive credit for a maximum of three (3) years of Prospective Credited Service during such period of absence.

Notwithstanding the above, an Employee shall continue to receive Credited Service for participation and vesting purposes only (not benefit accrual) during a period of absence beginning after December 31, 1984, up to two years, by reason of a maternity or paternity leave of absence. The Hours of Service credited under this paragraph shall be credited: (i) in the Eligibility Computation Period or Plan Year in which the

absence begins if the crediting is necessary to prevent a Break in Service in that period; or (ii) in all other cases, in the following Eligibility Computation Period or Plan Year.

A "maternity or paternity leave of absence" shall mean, for Plan Years beginning after December 31, 1984, an absence from work for any period by reason of the Employee's pregnancy, birth of the Employee's child, placement of a child with the Employee in connection with the adoption of such child, or any absence for the purpose of caring for such child for a period immediately following such birth or placement. For this purpose, Hours of Service shall be credited for the Plan Year in which the absence from work begins, only if credit therefore is necessary to prevent the Employee from incurring a Break in Service, or, in any other case, in the immediately following Plan Year. The Hours of Service credited for a "maternity or paternity leave of absence" shall be those which would normally have been credited for such absence, or, in any case in which the Trustees are unable to determine such hours normally credited, eight (8) Hours of Service per day.

To the extent required by Federal law, an approved Leave of Absence under the Family and Medical Leave Act of 1993, on account of which contributions of an Employer or the Union are required to be made, will not cause an Employee's Employment to be deemed broken and he will receive credit for the Hours of Service which would otherwise normally have been credited to such individual but for such leave, for a maximum of 12 weeks of Prospective Credited Service during such period of absence if he returns to work in Covered Employment.

A Temporary Break in Service shall become a Permanent Break in Service when the period of the Temporary Break, measured in Plan Years, equals or exceeds the greater of (i) five (5) or (ii) the aggregate amount of Service, measured in years, that the Participant had earned prior to the Temporary Break, and had not forfeited by reason of any previous Permanent Break in Service. Upon suffering a Permanent Break in Service, the Participant shall forfeit all Credited Service earned prior to the Permanent Break, unless the Participant has already earned at least five (5) years of Service, and has thereby qualified for a Deferred Vested Benefit.

An Employee will not lose his accrued Credited Service during any period of service in the Armed Forces of the United States in a period of national emergency, or on account of compulsory military service in the Armed Forces of the United States, provided, however, that he does not re-enlist after being eligible for discharge, and provided further that he returns to active employment with an Employer within the period provided by law for the protection of his re-employment rights following military service.

For periods on and after December 12, 1994, an Employee who is reemployed by the Employer in the period during which his right to reemployment after the completion of qualified military service (as defined in Code Section 414(u)(5)) is protected by federal law, no Break in Service shall be deemed to have been incurred by reason of such individual's period of qualified military service.

ARTICLE IV

ELIGIBILITY AND APPLICATION FOR RETIREMENT BENEFITS

Section 4.1 Normal Retirement Benefit. A Participant who has retired from all employment with an Employer on or after his Normal Retirement Date shall have a non-forfeitable right to receive a Normal Retirement Benefit in accordance with the provisions of Article VI and in the amount calculated pursuant to Article V, Section 5.1.

Section 4.2 Early Retirement Benefit. A Participant who retires from all employment with an Employer on his Early Retirement Date shall have a non-forfeitable right to receive an Early Retirement Benefit in accordance with the provisions of Article VI and in the amount calculated pursuant to Article V Section 5.2.

Section 4.3 Disability Retirement Benefit. This Section 4.3 is effective for a Participant who is eligible to receive a Disability Retirement Benefit prior to January 1, 2011. Effective for Annuity Starting Dates on or after January 1, 2011, the Disability Retirement Benefit is no longer provided under the Plan.

- (a) A Participant who
- (1) while in Covered Employment, becomes totally and permanently disabled; and
 - (2) has completed at least 5 years of Credited Service; and
 - (3) provides written proof that he is eligible for and is awarded a disability benefit under the provisions of the Social Security Act effective prior to January 1, 2011; and
 - (4) his "date of entitlement" within the meaning of the Federal Social Security Act is within one year of the date of his termination of employment; and
 - (5) makes proper application in writing to the Trustees

shall be eligible to receive a Disability Retirement Benefit in accordance with the provisions of Article VI and in the amount calculated pursuant to Article V, Section 5.3. Such Disability Retirement Benefit shall begin effective as of the first day that he is eligible to commence receiving a disability benefit under the Social Security Act, provided such date is prior to January 1, 2011, and shall continue until the first day of the month in which his death occurs.

- (b) If a Participant receiving a Disability Retirement Benefit recovers from his disability prior to his Normal Retirement Age, his Disability Retirement Benefit shall thereupon cease, and if such Participant does not again become a Participant, he shall be entitled to the benefits he would qualify for had he ceased to be a Participant other than by reason of disability.

Section 4.4 Deferred Vested Benefit. A Participant who is not otherwise entitled to receive a Retirement Benefit hereunder but whose employment with an Employer has terminated after he has completed five (5) or more years of Service shall have a nonforfeitable right to receive a Deferred Vested Benefit in accordance with the provisions of Article VI and in the amount calculated pursuant to Article V, Section 5.4.

If a Participant, after having become eligible for a Deferred Vested Benefit, returns to work as an Employee, he will continue to accrue Credited Service during such period of reemployment.

Section 4.5 Application for Retirement Benefits. A Participant who meets the conditions for retirement set forth in Sections 4.1, 4.2, 4.3, or 4.4 of this Article IV shall, upon retirement and upon approval by the Trustees of an application submitted to the Trustees in a form satisfactory to the Trustees, become entitled to receive a Retirement Benefit beginning the first day of the month next following receipt of such application by the Trustees.

Section 4.6 Change in Vesting Schedule. The Vested Accrued Benefit of any Participant shall not be less than such Vested Accrued Benefit computed under the Prior Plan.

The computation of a Participant's non-forfeitable percentage of his vested interest in the Plan shall not be reduced as the result of any direct or indirect amendment to Section 4.4. In the event that this Plan is amended to change or modify any vesting schedule, a Participant with at least three (3) years of Service as of the expiration date of the election period may elect to have his non-forfeitable percentage computed under the Plan without regard to such amendment. If a Participant fails to make such election, then such Participant shall be subject to the new vesting schedule. The Participant's election period shall commence on the adoption date of the amendment and shall end 60 days after the latest of:

- (i) the adoption date of the amendment;
- (ii) the effective date of the amendment; or
- (iii) the date the Participant receives written notice of the amendment from the Trustees.

Section 4.7 Limitation Regarding Time of Payment of Benefits. Unless the Participant elects otherwise, the payment of benefits authorized under this Article IV shall commence no later than the 60th day after the close of the Plan Year in which the latest of the following occurs:

- (a) the Participant's Normal Retirement Date; or
- (b) the 10th anniversary of the year in which the Participant commenced participation; or
- (c) the Participant terminates his service with the Employer.

Notwithstanding any provision in the Plan to the contrary, any benefits to which a Participant is entitled shall commence no later than the Participant's "Required Beginning Date," as defined in Section 6.5(f)(6).

Section 4.8 Suspension of Benefits Due to Reemployment of Pensioner.

- (a) The Retirement Benefit otherwise payable to a Pensioner shall be permanently suspended for each calendar month in which the Pensioner completes 40 or more Hours of Service in:
- (i) The bookbinding industry; and
 - (ii) A trade or craft in which the Participant was employed at any time under the Plan, and
 - (iii) The geographic area covered by the Plan (as defined in Department of Labor Regulations §2530.203-3) at the time payment of benefits to the Pensioner commenced or would have commenced if the Participant had not remained in or returned to employment.

Wherever the term "Employed" or "Employment" is used in this Section 4.8, it shall mean employment in accordance with this Section 4.8(a).

- (b) Resumption of Payments. If benefit payments have been suspended pursuant to Section 4.8 (a), payments shall resume no later than the first day of the third calendar month after the calendar month in which the Employee ceases to be re-employed as defined herein, provided that the Employee/Pensioner has notified the Board, as provided in Section 4.8(e), that he has ceased such Employment. The initial payment upon resumption of benefit payments shall include the Retirement Benefit scheduled to be paid in the calendar month when payments resume and any amounts withheld during the period between the Employee/Pensioner's cessation of Employment under Section 4.8 and the resumption of payments, less any amounts which are subject to offset, as provided in Section 4.8(c).

The monthly amount of pension when resumed shall be payable in the form of benefit in effect prior to the suspension of benefits. Such amounts shall be adjusted for any additional Credited Service earned during Employment and for any changes in the Plan adopted after the Pensioner first retired.

- (c) Offset Rules. The Administrator shall deduct from Retirement Benefits payable under the Plan any payments previously made to the Pensioner during those calendar months in which the Pensioner was Employed, provided that such deduction or offset shall not exceed in any one month twenty-five (25%) percent of that month's total Retirement Benefit which would have been due but for the deduction, excluding the initial payment described in Section 4.8(b), which may be subject to deduction without limitation.
- (d) Notification. No Retirement Benefit payment shall be suspended pursuant to this Section 4.8 unless the Administrator notifies the Pensioner by personal delivery or first class mail during the first calendar month of such suspension that the benefits are being suspended.

Such notification shall state the specific reasons why the pension benefit is being suspended, a general description of the Plan provisions relating to the suspension of payments, a copy of such provisions, and a statement that applicable Department of Labor regulations may be found in §2530.203-3 of the Code of Federal Regulations. In addition, the suspension notification shall inform the Pensioner that the Board's action in suspending the Retirement Benefit may be appealed under the Claims Procedures set forth in Article VIII of this Plan. The suspension notification shall also describe the procedure for filing such notice concerning resumption of benefits and include the forms (if any) which must be filed. The notice shall also state that the Board intends to deduct from such Retirement Benefits due to the Pensioner the amounts paid during the periods the Pensioner was Employed. The notification shall identify specifically the periods of Employment, the amounts to be deducted, and the manner in which such deductions will be made from future pension benefits.

- (e) Verification. A Pensioner must notify the Board of any Employment. Furthermore, at reasonable times, the Board may by written notice to the Pensioner by personal delivery or by first class mail, require as a condition of receiving future benefit payments, that the Pensioner certify that he is not Employed. Retirement Benefits shall be suspended until the Pensioner certifies that he is not Employed. If the Pensioner shall furnish the required certification, the Board shall forward to the Pensioner in the month following the month in which such certification is received, all Retirement Benefits which have been suspended pursuant to this Section 4.8, except to the extent that payments may be suspended as provided above.
- (f) Status Determination. A Pensioner may request, in writing, a determination of whether a specific contemplated employment constitutes Employment as defined in Section 4.8(a). The Board within a reasonable time after receipt of such request shall advise the Pensioner of its determination. A Pensioner may appeal the determination of the Board in accordance with the Claims Procedures set forth in Article VIII of this Plan.
- (g) The provisions of this Article IV, Section 4.8 shall be construed in accordance with the provisions of 29 CFR §2530.203-3 of the Code of Federal Regulations.
- (h) The provisions of this Section 4.8, shall apply to all Pensioners on or after January 1, 1982.

ARTICLE V

AMOUNT OF RETIREMENT BENEFITS

Section 5.1 Normal Retirement Benefit. A Participant who is eligible for a Normal Retirement Benefit in accordance with Section 4.1 shall be entitled to receive an Accrued Benefit calculated as follows:

- (a) If a Participant's last day of Covered Employment occurred before January 1, 2001, his Accrued Monthly Pension shall be determined under the provisions of the Plan as then in effect.
- (b) If a Participant's last day of Covered Employment is on or after January 1, 2001, his Accrued Monthly Pension shall be equal to \$14.00 multiplied by his Credited Service (including fractional years).

Effective January 1, 1998, if a Participant's Annuity Starting Date is later than April 1 of the calendar year next following the calendar year in which he reaches age 70-1/2, his Accrued Benefit shall be adjusted actuarially to reflect the deferral of his Annuity Starting Date from April 1 of the calendar year next following his attainment of age 70-1/2 to his actual Annuity Starting Date.

Section 5.2 Early Retirement Benefit. A Participant who is eligible for an Early Retirement Benefit in accordance with Section 4.2 may, in lieu of the Normal Retirement Benefit provided in Section 5.1, elect to receive such payments commencing on or after the Early Retirement Date. Such Early Retirement Benefit shall be reduced by ½ of 1% for each month by which his Early Retirement Date precedes his Normal Retirement Date.

Section 5.3 Disability Retirement Benefit. A Participant who is eligible for a Disability Retirement Benefit in accordance with Section 4.3 shall receive a monthly benefit equal to the Normal Retirement Benefit provided in Section 5.1 with no reduction for retirement prior to the Normal Retirement Date. If a Participant receiving a Disability Retirement Benefit recovers from his disability prior to his Normal Retirement Age, his Disability Retirement Benefit shall thereupon cease and if such Participant does not again become a Participant, he shall be entitled to the Retirement Benefit he would qualify for had he ceased to be a Participant other than by reason of disability.

Section 5.4 Deferred Vested Benefit. A Participant who is eligible for a Deferred Vested Benefit in accordance with Section 4.4 shall receive a monthly benefit equal to the Normal Retirement Benefit as provided in Section 5.1 commencing on the Normal Retirement Date.

In lieu thereof, a vested Participant who satisfies the years of Service requirement for Early Retirement but who terminated employment with the Employer before the attainment of age 55, may, upon the attainment of age 55, elect to receive his monthly Retirement Benefit commencing on the first day of any month following the attainment of age 55, but before his Normal Retirement Date, reduced for early commencement in accordance with Section 5.2.

Section 5.5 Cash-out of Vested Accrued Monthly Pension. If the Actuarial Equivalent of the Vested Accrued Monthly Pension otherwise required to be paid to a Participant or his surviving Spouse does not exceed \$2,500, then a distribution may only be made in the form of a lump sum payment.

Effective March 28, 2005, the Board may make an immediate lump sum distribution of the Actuarial Equivalent of the Participant's Vested Accrued Monthly Pension in lieu of all benefits in the event the Actuarial Equivalent of his Vested Accrued Monthly Pension is not in excess of \$1,000 at the time of distribution. The Board may make an immediate distribution of such benefit to a Participant without such Participant's consent.

In the event the Actuarial Equivalent of the Participant's Vested Accrued Monthly Pension exceeds \$1,000 but does not exceed \$2,500 at the time of distribution, the Participant may make application to receive a lump sum payment. Spousal consent to the Participant's election of the lump sum is not required.

Lump sum distributions may be made only on account of termination of participation in the Plan. No distributions may be made under this Section 5.5 after the Annuity Starting Date. A Participant receiving a distribution of \$200 or more pursuant to this Section 5.5 shall be entitled to elect to have all or a portion, if applicable, of the amount paid in a Direct Rollover pursuant to Section 6.6.

If the nonforfeitable Accrued Benefit of a Participant is zero, such Participant shall be deemed to have received distribution of his entire Vested Accrued Benefit under the Plan, in lieu of all other benefits under the Plan, as of the date of his termination of employment with the Employer and he shall cease to be a Participant under the Plan as of such date. If a Participant is deemed to receive a distribution pursuant to this Section 5.5, and the Participant resumes employment covered under this Plan before the date the Participant incurs five consecutive one-year Breaks in Service, upon the reemployment of such Participant, the Accrued Benefit will be restored to the amount of such Accrued Benefit on the date of the deemed distribution.

Section 5.6 Increase in Benefits to Pensioners and Beneficiaries.

- (a) The monthly Retirement Benefit payable with respect to each Pensioner or Beneficiary who was receiving Retirement Benefits under the Plan on October 1, 1987 shall be increased by 10% effective as of October 1, 1987.
- (b) The monthly Retirement Benefit payable with respect to each Pensioner or Beneficiary who was receiving Retirement Benefits under the Plan on January 1, 1992 shall be increased by 10% effective as of January 1, 1992.
- (c) The monthly Retirement Benefit payable with respect to each Pensioner or Beneficiary who was receiving Retirement Benefits under the Plan on January 1, 2002 shall be increased by 5% effective as of January 1, 2002.

ARTICLE VI

PAYMENT OF RETIREMENT BENEFITS

Section 6.1 Qualified Joint and Survivor Annuity.

- (a) If a Participant is married on his Annuity Starting Date, his Retirement Benefit shall be paid in the form of a Qualified Joint and Survivor Annuity. Under the Qualified Joint and Survivor Annuity, a reduced amount shall be paid to the Pensioner for his lifetime; and at his death, his Eligible Surviving Spouse shall be entitled to 50% of such reduced Retirement Benefit. This survivorship annuity shall commence on the first day of the month following the date of the Pensioner's death and shall continue during the lifetime of the Eligible Surviving Spouse.

The reduced amount payable to the Pensioner shall be the Actuarial Equivalent of the Retirement Benefit determined in accordance with Section 5.1, 5.2, 5.3, 5.4 or 5.5 otherwise payable in the Normal Form of benefit for an unmarried Participant, as described in Section 6.2(a).

For Annuity Starting Dates prior to January 1, 2011, if the Pensioner and his Eligible Surviving Spouse die before sixty (60) monthly payments are made, the named Beneficiary or the estate shall receive the discounted value of the remaining monthly payments in a lump sum payment.

- (b) A married Participant may elect not to take the Qualified Joint and Survivor Annuity during an election period which shall be the 180-day period ending on his Annuity Starting Date. Any election to waive the Qualified Joint and Survivor Annuity must be made by the Participant, in writing, during the election period and be consented to by the Participant's Eligible Surviving Spouse. Such election shall designate a Beneficiary (or a form of benefit) that may not be changed without spousal consent (unless the consent of the Spouse expressly permits designation by the Participant without the requirements of further consent by the Spouse). Such Spouse's consent shall be irrevocable and must acknowledge the effect of such election and be witnessed by a Plan representative or a notary public. Such consent shall not be required if it is established to the satisfaction of the Board that the required consent cannot be obtained because there is no Spouse, the Spouse cannot be located, or other circumstances that may be prescribed by Treasury regulations. The election made by the Participant and consented to by his Spouse may be revoked by the Participant in writing without the consent of the Spouse at any time during the election period. The number of revocations shall not be limited. Any new election must comply with the requirements of this Section 6.1. A former Spouse's waiver shall not be binding on a new Spouse.
- (c) With regard to the election, the Board shall provide the Participant, no less than 30 days and no more than 180 days before the Annuity Starting Date (and consistent with Treasury regulations), a written explanation of:

- (i) the terms and conditions of the Qualified Joint and Survivor Annuity;
- (ii) the Participant's right to make an election to waive the Qualified Joint and Survivor Annuity;
- (iii) the right of the Participant's Spouse to consent to any election to waive the Qualified Joint and Survivor Annuity;
- (iv) the right of the Participant to revoke such election, and the effect of such revocation; and
- (v) the relative values of the various optional forms of benefit under the Plan, as provided in Regulation §1.417(a)-3.

Notwithstanding the foregoing, a Participant may commence distribution earlier than the expiration of the 180-day period described above, if the applicable election period to waive the Qualified Joint and Survivor Annuity shall not end before the 30th day after the date of which such explanation is provided. Moreover, a Participant may elect (with any applicable spousal consent) to waive the requirement that the written explanation be provided at least 30 days before the Annuity Starting Date if the distribution commences more than 7 days after such explanation is provided.

- (d) "Eligible Surviving Spouse" shall mean the Spouse of a Participant who was legally married to such Participant on the earlier of the Participant's date of retirement or the date of death of the Participant.
- (e) An official marriage certificate and birth certificate of the Participant and his Spouse and/or other documentation must be submitted to the Administrator showing evidence of the legal marriage and ages of the Participant and his Spouse.
- (f) Upon the death of a Participant who has no Eligible Surviving Spouse, no Qualified Joint and Survivor Annuity shall be payable under this Section 6.1.
- (g) If a Participant's Spouse dies before the Participant's Annuity Starting Date, his election of the Qualified Joint and Survivor Annuity shall automatically be revoked.

Section 6.2 Normal Form of Benefit.

- (a) **Single Life Annuity.** If a Participant is not married on his Annuity Starting Date, or if he elected in accordance with the procedures in Sections 6.1(b) and (c) not to provide the Qualified Joint and Survivor Annuity for his Spouse, the Normal Form of benefit is his monthly Retirement Benefit in the amount determined under Sections 5.1, 5.2, 5.3 or 5.4 payable in the form as provided in (i) or (ii) below, as applicable:

- (i) effective for Annuity Starting Dates prior to January 1, 2011, a Single Life Annuity with 60 monthly payments guaranteed to the Participant, his named Beneficiary, if living, or otherwise, to his estate; or
 - (ii) effective for Annuity Starting Dates on or after January 1, 2011, a Single Life Annuity payable to the Participant during his lifetime.
- (b) **Qualified Joint and Survivor Annuity.** If a Participant is married on his Annuity Starting Date, the Normal Form of benefit is the Qualified Joint and Survivor Annuity, as defined in Section 6.1(a), which is the Actuarial Equivalent of the Normal Form of benefit for a Participant who is not married on his Annuity Starting Date, as described in Section 6.2(a).

Section 6.3 Optional Forms of Benefit.

- (a) In lieu of the Normal Form of benefit for which a Participant may be eligible in accordance with Sections 6.1 and 6.2 of this Article VI, a Participant may elect, subject to the conditions and restrictions set forth in this Article VI, to receive his monthly benefit in one of the following optional forms of benefit:
- (1) **75% Joint and Survivor Annuity** (*effective for benefits commencing on and after January 1, 2009*) - under which a reduced amount of Retirement Benefit is payable to the Participant during his lifetime, with the provision that after his death 75% of such reduced amount of benefit shall continue to and for the lifetime of his Eligible Surviving Spouse.
 - (2) **Single Life Annuity with Five Year Certain** (*effective for benefits commencing on and after January 1, 2011*) - under which a reduced amount of Retirement Benefit is payable to the Participant during his lifetime, with the provision that if his death occurs before he has received 60 monthly payments, such payments will continue to his designated Beneficiary, if living, or otherwise, to his estate, until a total of 60 monthly payments have been made to the Pensioner and such Beneficiary or estate.

The benefit payments under the Options described herein shall be the Actuarial Equivalent of the benefit payments which would otherwise be provided under Article V, whichever is applicable, payable in the Normal Form of benefit for an unmarried Participant, as described in Section 6.2(a).

- (b) The election of any option described in Section 6.3(a) of this Article VI other than the automatic payment forms described in Sections 6.1 and 6.2 must be made in writing on a form provided by the Board and must conform to the procedures in Sections 6.1(b) and (c). After an Option has been elected, any change in the election may be made only with the approval of the Board and shall be subject to such conditions and restrictions as the

Board, acting in accordance with the uniform regulations, shall determine. Election of an Option shall be irrevocable after it has become effective, and no change in such election shall be permitted thereafter.

An Option election shall become effective on the Participant's Annuity Starting Date subject to the provisions of this Section 6.3(b). If the Participant or his Eligible Surviving Spouse dies after an Option is elected but before such election has become effective, the Option shall be canceled automatically.

Section 6.4 Pre-Retirement Death Benefits.

(a) Single Sum Pre-Retirement Death Benefit.

If an Employee or former Employee for whom contributions have been made to the Plan for at least five (5) full years, dies prior to receiving a Normal, Early, or Disability Retirement Benefit, a Single Sum Pre-Retirement Death Benefit shall be paid to the Beneficiary named by the Participant or former Participant, or if no Beneficiary is named or if such Beneficiary is not living, to such Participant's or former Participant's estate. Such Single Sum Pre-Retirement Death Benefit shall be equal to the sum of the product of the number of years for which contributions have been made to the Plan on behalf of such Participant or former Participant during each of the periods of time set forth below and (2) the applicable amount for each such period of time as follows:

<u>Period of Time</u>	<u>Amount</u>
1/1/1962 to 12/31/1973	\$108.00
1/1/1974 to 12/31/1975	\$126.00
1/1/1976 and thereafter	\$157.50

The maximum Single Sum Pre-Retirement Death Benefit paid under this Section 6.4(a) shall be \$5,512.50, subject to any restrictions under Code Section 432(f)(2).

(b) Pre-Retirement Surviving Spouse Annuity.

(i) In lieu of the Single Sum Pre-Retirement Death Benefit described in Section 6.4(a), a married Participant who is entitled to a Vested Accrued Benefit or married former Participant who is eligible for a Deferred Vested Benefit in accordance with Article IV, Section 4.4 and who dies prior to retirement shall be deemed automatically to have elected a Pre-Retirement Surviving Spouse Annuity.

If the Participant dies after attaining the earliest retirement age, such Pre-Retirement Surviving Spouse Annuity shall provide a lifetime monthly pension benefit for the Participant's Eligible Surviving Spouse, as defined in Section 6.1(d), equal to the amount the Spouse would have been entitled to receive under

the Qualified Joint and Survivor Annuity if the Participant had retired on the day immediately preceding his death and shall commence on the first day of the month coincident with or next following his date of death.

If the Participant dies prior to attaining the earliest retirement age, his Eligible Surviving Spouse shall be entitled to a lifetime monthly benefit equal to 50% of the amount that would have been payable under the Qualified Joint and Survivor Annuity if the Participant had terminated Covered Employment on the day of his death, or the date he last worked in Covered Employment, if earlier, survived to his earliest retirement age, retired with an immediate Qualified Joint and Survivor Annuity and died on the day after the day on which such Participant would have attained his earliest retirement age. Such Pre-Retirement Surviving Spouse Annuity shall commence on the first day of the month in which the Participant would have attained his earliest retirement age.

The earliest retirement age, as used in this Section 6.4, shall be defined as the earliest age at which a Participant could separate from service and immediately receive a Retirement Benefit.

- (ii) If the Actuarial Equivalent of the Pre-Retirement Surviving Spouse Annuity payable under Section 6.4(b)(i) is less than the Single Sum Pre-Retirement Death Benefit computed under Section 6.4(a), then, in addition to the Pre-Retirement Surviving Spouse Annuity, the difference between the Pre-Retirement Surviving Spouse Annuity payable under Section 6.4(b)(i) and the Single Sum Pre-Retirement Death Benefit computed under Section 6.4(a) shall be paid to the Eligible Surviving Spouse in a single sum.
- (c) If the Actuarial Equivalent of the Pre-Retirement Surviving Spouse Annuity is not in excess of \$2,500, at the time of distribution, the Trustees shall direct the immediate distribution of such amount to the Participant's Eligible Surviving Spouse. An Eligible Surviving Spouse receiving a distribution of \$200 or more pursuant to this paragraph (c) shall be entitled to elect to have all or a portion, if applicable, of this amount paid pursuant to Section 6.6 without regard to the election procedure under Article VI. No distribution may be made under the preceding sentence after the Annuity Starting Date unless the Spouse consents in writing.
- (d) In the case of a Participant who dies on or after January 1, 2007 while performing qualified military service, as defined in Code Section 414(u), the Participant's Beneficiary will be entitled to any additional benefits (other than benefit accruals relating to the period of qualified military service, but including any other survivor benefits) that would have been provided under the Plan as if the Participant had resumed employment on the day preceding the Participant's death and then immediately terminated employment on account of death. For vesting purposes, the Participant will receive credit for qualified military service in determining his years of Service, as though the Participant was reemployed in accordance with Code Section 414(u) immediately prior to his death.

Section 6.5 Minimum Distribution Requirements.

(a) General Rules.

- (1) Effective Date. Except as otherwise provided herein, the provisions of this Section will first apply for purposes of determining required minimum distributions for calendar years beginning on and after January 1, 2006.
- (2) Requirements of Treasury Regulations Incorporated. All distributions required under this Section 6.5 shall be determined and made in accordance with Code Section 401(a)(9), including the incidental death benefit requirement in Code Section 401(a)(9)(G), and the Regulations thereunder.
- (3) Precedence. Subject to the joint and survivor annuity requirements of the Plan, the requirements of this Section 6.5 shall take precedence over any inconsistent provisions of the Plan.
- (4) TEFRA Section 242(b)(2) Elections.
 - (i) Notwithstanding the other provisions of this Section, other than Section 6.5(a)(2), distributions may be made on behalf of any Participant, including a five percent (5%) owner, who has made a designation in accordance with Section 242(b)(2) of the Tax Equity and Fiscal Responsibility Act (TEFRA) and in accordance with all of the following requirements (regardless of when such distributions commence):
 - (A) The distribution by the Plan is one which would not have disqualified such plan under Code Section 401(a)(9) as in effect prior to amendment by the Deficit Reduction Act of 1984.
 - (B) The distribution is in accordance with a method of distribution designated by the Participant whose interest in the Plan is being distributed or, if the Participant is deceased, by a Beneficiary of such Participant.
 - (C) Such designation was in writing, was signed by the Participant or Beneficiary, and was made before January 1, 1984.
 - (D) The Participant had accrued a benefit under the Plan as of December 31, 1983.

- (E) The method of distribution designated by the Participant or the beneficiary specifies the time at which distribution will commence, the period over which distributions will be made, and in the case of any distribution upon the Participant's death, the beneficiaries of the Participant listed in order of priority.
- (ii) A distribution upon death will not be covered by the transitional rule of this Subsection unless the information in the designation contains the required information described above with respect to the distributions to be made upon the death of the Participant.
- (iii) For any distribution which commences before January 1, 1984, but continues after December 31, 1983, the Participant, or the beneficiary, to whom such distribution is being made, will be presumed to have designated the method of distribution under which the distribution is being made if the method of distribution was specified in writing and the distribution satisfies the requirements in (i)(A) and (i)(E) of this Subsection.
- (iv) If a designation is revoked, any subsequent distribution must satisfy the requirements of Code Section 401(a)(9) and the Regulations thereunder. If a designation is revoked subsequent to the date distributions are required to begin, the Plan must distribute by the end of the calendar year following the calendar year in which the revocation occurs the total amount not yet distributed which would have been required to have been distributed to satisfy Code Section 401(a)(9) and the Regulations thereunder, but for the Section 242(b)(2) election. For calendar years beginning after December 31, 1988, such distributions must meet the minimum distribution incidental benefit requirements. Any changes in the designation will be considered to be a revocation of the designation. However, the mere substitution or addition of another beneficiary (one not named in the designation) under the designation will not be considered to be a revocation of the designation, so long as such substitution or addition does not alter the period over which distributions are to be made under the designation, directly or indirectly (for example, by altering the relevant measuring life).
- (v) In the case in which an amount is transferred or rolled over from one plan to another plan, the rules in Regulation §1.401(a)(9)-8, Q&A-14 and Q&A-15, shall apply.

(b) Time and Manner of Distribution.

- (1) Required Beginning Date. The Participant's entire interest will be distributed, or begin to be distributed, no later than the Participant's "Required Beginning Date."
- (2) Death of Participant Before Distributions Begin. If the Participant dies before distributions begin, the Participant's entire interest will be distributed, or begin to be distributed, no later than as follows:
 - (i) Life Expectancy Rule, Spouse is Beneficiary. If the Participant's surviving Spouse is the Participant's sole "Designated Beneficiary," then distributions to the surviving Spouse will begin by December 31st of the calendar year immediately following the calendar year in which the Participant died, or by December 31st of the calendar year in which the Participant would have attained age 70-1/2, if later.
 - (ii) Life Expectancy Rule, Spouse is not Beneficiary. If the Participant's surviving Spouse is not the Participant's sole "Designated Beneficiary," then distributions to the "Designated Beneficiary" will begin by December 31st of the calendar year immediately following the calendar year in which the Participant died.
 - (iii) No Designated Beneficiary, Five-Year Rule. If there is no "Designated Beneficiary" as of September 30th of the year following the year of the Participant's death, the Participant's entire interest will be distributed by December 31st of the calendar year containing the fifth anniversary of the Participant's death.
 - (iv) Surviving Spouse Dies before Distributions Begin. If the Participant's surviving Spouse is the Participant's sole "Designated Beneficiary" and the surviving Spouse dies after the Participant but before distributions to the surviving Spouse begin, then this Section 6.5(b), other than Section 6.5(b)(2)(i), will apply as if the surviving Spouse were the Participant.

For purposes of this Section 6.5(b) and Section 6.5(e), distributions are considered to begin on the Participant's "Required Beginning Date" (or, if Section 6.5(b)(2)(iv) applies, the date distributions are required to begin to the surviving Spouse under Section 6.5(b)(2)(i)). If annuity payments irrevocably commence to the Participant before the Participant's "Required Beginning Date" (or to the Participant's surviving Spouse before the date distributions are required to begin to the surviving Spouse under Section 6.5(b)(2)(i)), the date distributions are considered to begin is the date distributions actually commence.

- (3) Form of Distribution. Unless the Participant's interest is distributed in the form of an annuity purchased from an insurance company or in a single sum on or before the "Required Beginning Date," as of the first "Distribution Calendar Year," distributions will be made in accordance with Section 6.5(c) and Sections 6.5(d) or 6.5(e), as applicable. If the Participant's interest is distributed in the form of an annuity purchased from an insurance company, distributions thereunder will be made in accordance with the requirements of Section 401(a)(9) of the Code and the Treasury regulations thereunder.

(c) Determination of Amount to be Distributed Each Year.

- (1) General Annuity Requirements. A Participant who is required to begin payments as a result of attaining his or her "Required Beginning Date," whose interest has not been distributed in the form of an annuity purchased from an insurance company or in a single sum before such date, may receive such payments in the form of annuity payments under the Plan. Payments under such annuity must satisfy the following requirements:

- (i) The annuity distributions will be paid in periodic payments made at intervals not longer than one year;
- (ii) The distribution period will be over a life (or lives) or over a period certain not longer than the period described in Section 6.5(d) or 6.5(e);
- (iii) Once payments have begun over a period certain, the period certain will not be changed even if the period certain is shorter than the maximum permitted.
- (iv) Payments will either be nonincreasing or increase only to the extent permitted by one of the following conditions:
 - (A) By an annual percentage increase that does not exceed the annual percentage increase in an Eligible Cost-of-Living Index for a 12-month period ending in the year during which the increase occurs or the prior year;
 - (B) By a percentage increase that occurs at specified times (e.g., at specified ages) and does not exceed the cumulative total of annual percentage increases in an Eligible Cost-of-Living Index since the Annuity Starting Date, or if later, the date of the most recent percentage increase. In cases providing such a cumulative increase, an actuarial increase may not be provided to reflect the fact that increases were not provided in the interim years;

- (C) To the extent of the reduction in the amount of the Participant's payments to provide for a survivor benefit upon death, but only if the beneficiary whose life was being used to determine the distribution period described in Section 6.5(d) dies or is no longer the Participant's Beneficiary pursuant to a qualified domestic relations order within the meaning of Code Section 414(p);
- (D) To allow a Beneficiary to convert the survivor portion of a joint and survivor annuity into a single sum distribution upon the Participant's death;
- (E) To pay increased benefits that result from a Plan amendment or other increase in the Participant's Accrued Benefit under the Plan;
- (F) By a constant percentage, applied not less frequently than annually, at a rate that is less than five percent (5%) per year;
- (G) To provide a final payment upon the death of the Participant that does not exceed the excess of the actuarial present value of the Participant's Accrued Benefit (within the meaning of Code Section 411(a)(7)) calculated as of the Annuity Starting Date using the Applicable Interest Rate and the Applicable Mortality Table under Code Section 417(e) over the total of payments before the death of the Participant; or
- (H) As a result of dividend or other payments that result from "Actuarial Gains," provided:
 - (i) Actuarial gain is measured not less frequently than annually;
 - (ii) The resulting dividend or other payments are either paid no later than the year following the year for which the actuarial experience is measured or paid in the same form as the payment of the annuity over the remaining period of the annuity (beginning no later than the year following the year for which the actuarial experience is measured);
 - (iii) The "Actuarial Gain" taken into account is limited to "Actuarial Gain" from investment experience;

- (iv) The assumed interest rate used to calculate such “Actuarial Gains” is not less than three percent (3%); and
- (v) The annuity payments are not also being increased by a constant percentage as described in Subsection (F) above.

(2) Amount Required to be Distributed by Required Beginning Date.

- (i) In the case of a Participant whose interest in the Plan is being distributed as an annuity pursuant to Subsection (1) above, the amount that must be distributed on or before the Participant's “Required Beginning Date” (or, if the Participant dies before distributions begin, the date distributions are required to begin under Section 6.5(b)(2)(i) or 6.5(b)(2)(ii)) is the payment that is required for one payment interval. The second payment need not be made until the end of the next payment interval even if that payment interval ends in the next calendar year. Payment intervals are the periods for which payments are received, e.g., bi-monthly, monthly, semi-annually, or annually. All of the Participant's benefit accruals as of the last day of the first “Distribution Calendar Year” will be included in the calculation of the amount of the annuity payments for payment intervals ending on or after the Participant's “Required Beginning Date.”
- (ii) In the case of a single sum distribution of a Participant's entire Accrued Benefit during a “Distribution Calendar Year,” the amount that is the required minimum distribution for the “Distribution Calendar Year” (and thus not eligible for rollover under Code Section 402(c)) is determined under this paragraph. The portion of the single sum distribution that is a required minimum distribution is determined by treating the single sum distribution as a distribution from an individual account plan and treating the amount of the single sum distribution as the Participant's account balance as of the end of the relevant valuation calendar year. If the single sum distribution is being made in the calendar year containing the “Required Beginning Date” and the required minimum distribution for the Participant's first “Distribution Calendar Year” has not been distributed, the portion of the single sum distribution that represents the required minimum distribution for the Participant's first and second “Distribution Calendar Year” is not eligible for rollover.

(3) Additional Accruals After First Distribution Calendar Year. Any additional benefits accruing to the Participant in a calendar year after the first

“Distribution Calendar Year” will be distributed beginning with the first payment interval ending in the calendar year immediately following the calendar year in which such amount accrues. Notwithstanding the preceding, the Plan will not fail to satisfy the requirements of this paragraph and Code Section 401(a)(9) merely because there is an administrative delay in the commencement of the distribution of the additional benefits accrued in a calendar year, provided that the actual payment of such amount commences as soon as practicable. However, payment must commence no later than the end of the first calendar year following the calendar year in which the additional benefit accrues, and the total amount paid during such first calendar year must be no less than the total amount that was required to be paid during that year under this paragraph.

- (4) Death After Distributions Begin. If a Participant dies after distribution of the Participant's interest begins in the form of an annuity meeting the requirements of this Section, then the remaining portion of the Participant's interest will continue to be distributed over the remaining period over which distributions commenced.

(d) Requirements For Annuity Distributions That Commence During Participant's Lifetime.

- (1) Joint Life Annuities Where the Beneficiary Is the Participant's Spouse. If distributions commence under a distribution option that is in the form of a joint and survivor annuity for the joint lives of the Participant and the Participant's Spouse, the minimum distribution incidental benefit requirement will not be satisfied as of the date distributions commence unless, under the distribution option, the periodic annuity payment payable to the survivor does not at any time on and after the Participant's “Required Beginning Date” exceed the annuity payable to the Participant. In the case of an annuity that provides for increasing payments, the requirement of this paragraph will not be violated merely because benefit payments to the Beneficiary increase, provided the increase is determined in the same manner for the Participant and the Beneficiary. If the form of distribution combines a joint and survivor annuity for the joint lives of the Participant and the Participant's Spouse and a period certain annuity, the preceding requirements will apply to annuity payments to be made to the “Designated Beneficiary” after the expiration of the period certain.
- (2) Joint Life Annuities Where the Beneficiary Is Not the Participant's Spouse. If the Participant's interest is being distributed in the form of a joint and survivor annuity for the joint lives of the Participant and a Beneficiary other than the Participant's Spouse, the minimum distribution incidental benefit requirement will not be satisfied as of the date distributions commence unless under the distribution option, the annuity payments to be made on and after

the Participant's "Required Beginning Date" will satisfy the conditions of this paragraph. The periodic annuity payment payable to the survivor must not at any time on and after the Participant's "Required Beginning Date" exceed the applicable percentage of the annuity payment payable to the Participant using the table set forth in Q&A-2(c)(2) of §1.401(a)(9)-6 of the Regulations. The applicable percentage is based on the adjusted Participant/Beneficiary age difference. The adjusted Participant/Beneficiary age difference is determined by first calculating the excess of the age of the Participant over the age of the Beneficiary based on their ages on their birthdays in a calendar year. If the Participant is younger than age 70, the age difference determined in the previous sentence is reduced by the number of years that the Participant is younger than age 70 on the Participant's birthday in the calendar year that contains the Annuity Starting Date. In the case of an annuity that provides for increasing payments, the requirement of this paragraph will not be violated merely because benefit payments to the Beneficiary increase, provided the increase is determined in the same manner for the Participant and the Beneficiary. If the form of distribution combines a joint and survivor annuity for the joint lives of the Participant and a nonspouse Beneficiary and a period certain annuity, the preceding requirements will apply to annuity payments to be made to the "Designated Beneficiary" after the expiration of the period certain.

- (3) Period Certain Annuities. Unless the Participant's Spouse is the sole "Designated Beneficiary" and the form of distribution is a period certain and no life annuity, the period certain for an annuity distribution commencing during the Participant's lifetime may not exceed the applicable distribution period for the Participant under the Uniform Lifetime Table set forth in Regulation §1.401(a)(9)-9 for the calendar year that contains the Annuity Starting Date. If the Annuity Starting Date precedes the year in which the Participant reaches age 70, the applicable distribution period for the Participant is the distribution period for age 70 under the Uniform Lifetime Table set forth in Regulation §1.401(a)(9)-9 plus the excess of 70 over the age of the Participant as of the Participant's birthday in the year that contains the Annuity Starting Date. If the Participant's Spouse is the Participant's sole "Designated Beneficiary" and the form of distribution is a period certain and no life annuity, the period certain may not exceed the longer of the Participant's applicable distribution period, as determined under this Section 6.5(d)(3), or the joint life and last survivor expectancy of the Participant and the Participant's Spouse as determined under the Joint and Last Survivor Table set forth in Regulation §1.401(a)(9)-9, using the Participant's and Spouse's attained ages as of the Participant's and Spouse's birthdays in the calendar year that contains the Annuity Starting Date.

(e) Requirements For Minimum Distributions Where Participant Dies Before Date Distributions Begin.

(1) Participant Survived by Designated Beneficiary and Life Expectancy Rule.

If the Participant dies before the date distribution of his or her interest begins and there is a "Designated Beneficiary," the Participant's entire interest will be distributed, beginning no later than the time described in Section 6.5(b)(2)(i) or 6.5(b)(2)(ii), over the life of the "Designated Beneficiary" or over a period certain not exceeding:

(i) Unless the Annuity Starting Date is before the first "Distribution Calendar Year," the "Life Expectancy" of the "Designated Beneficiary" determined using the Beneficiary's age as of the Beneficiary's birthday in the calendar year immediately following the calendar year of the Participant's death; or

(ii) If the Annuity Starting Date is before the first Distribution Calendar Year, the "Life Expectancy" of the "Designated Beneficiary" determined using the Beneficiary's age as of the Beneficiary's birthday in the calendar year that contains the Annuity Starting Date.

(2) No Designated Beneficiary. If the Participant dies before the date distributions begin and there is no "Designated Beneficiary" as of September 30th of the year following the year of the Participant's death, distribution of the Participant's entire interest will be completed by December 31st of the calendar year containing the fifth anniversary of the Participant's death.

(3) Death of Surviving Spouse Before Distributions to Surviving Spouse Begin.

If the Participant dies before the date distribution of his or her interest begins, the Participant's surviving Spouse is the Participant's sole "Designated Beneficiary," and the surviving Spouse dies before distributions to the surviving Spouse begin, this Section 6.5(e) will apply as if the surviving Spouse were the Participant, except that the time by which distributions must begin will be determined without regard to Section 6.5(b)(2)(i).

(f) Definitions.

(1) Actuarial Gain. "Actuarial Gain" shall mean the difference between an amount determined using the actuarial assumptions (i.e., investment return, mortality, expense, and other similar assumptions) used to calculate the initial payments before adjustment for any increases and the amount determined under the actual experience with respect to those factors. Actuarial Gain also includes differences between the amount determined using actuarial assumptions when an annuity was purchased or commenced and such amount

determined using actuarial assumptions used in calculating payments at the time the Actuarial Gain is determined.

- (2) Designated Beneficiary. “Designated Beneficiary” shall mean the individual who is designated as the Beneficiary under Section 1.5 of the Plan and is the designated Beneficiary under Code Section 401(a)(9) and Regulation §1.401(a)(9)-4.
- (3) Distribution Calendar Year. “Distribution Calendar Year” shall mean a calendar year for which a minimum distribution is required. For distributions beginning before the Participant's death, the first Distribution Calendar Year is the calendar year immediately preceding the calendar year which contains the Participant's “Required Beginning Date.” For distributions beginning after the Participant's death, the first Distribution Calendar Year is the calendar year in which distributions are required to begin pursuant to Section 6.5(b).
- (4) Eligible Cost-of-Living Index. An “Eligible Cost-of-Living Index” shall mean an index described below:
 - (i) A consumer price index that is based on prices of all items (or all items excluding food and energy) and issued by the Bureau of Labor Statistics, including an index for a specific population (such as urban consumers or urban wage earners and clerical workers) and an index for a geographic area or areas (such as a given metropolitan area or state); or
 - (ii) A percentage adjustment based on a cost-of-living index described in Subsection (i) above, or a fixed percentage, if less. In any year when the cost-of-living index is lower than the fixed percentage, the fixed percentage may be treated as an increase in an Eligible Cost-of-Living Index, provided it does not exceed the sum of:
 - (A) The cost-of-living index for that year, and
 - (B) The accumulated excess of the annual cost-of-living index from each prior year over the fixed annual percentage used in that year (reduced by any amount previously utilized under this Subsection (ii)).
- (5) Life Expectancy. “Life Expectancy” shall mean the life expectancy as computed by use of the Single Life Table in Regulation §1.401(a)(9)-9.

- (6) Required Beginning Date. “Required Beginning Date” shall mean the April 1st of the calendar year following the calendar year in which the Participant attains age 70-1/2.

Section 6.6 Direct Rollover.

- (a) Notwithstanding any provision of the Plan to the contrary that would otherwise limit a Distributee’s election, a Distributee under this Section 6.6 may elect at the time and in the manner prescribed by the Trustees, to have all or a portion, if applicable, of an Eligible Rollover Distribution paid in the form of a Direct Rollover to an Eligible Retirement Plan that accepts the Distributee’s Eligible Rollover Distribution.
- (b) For purposes of this Section 6.6, the following terms shall have the following meanings:
- (i) Eligible Rollover Distribution. An Eligible Rollover Distribution shall mean any distribution of all or any portion of the balance to the credit of the Distributee, except that an Eligible Rollover Distribution does not include:
- (A) any distribution that is one of a series of substantially equal periodic payments (not less frequently than annually) made for the life (or life expectancy) of the Distributee or the joint lives (or joint life expectancies) of the Distributee and the Distributee’s designated beneficiary, or for a specified period of 10 years or more;
 - (B) any distribution to the extent such distribution is required under Section 401(a)(9) of the Code;
 - (C) the portion of any distribution that is not includable in gross income (determined without regard to the exclusion for net unrealized appreciation with respect to employer securities); and
 - (D) any distribution with a value of \$200 or less.

If an Eligible Rollover Distribution is less than \$500, a Distributee may not make the election to roll over only a portion of the Eligible Rollover Distribution.

- (ii) Eligible Retirement Plan. An Eligible Retirement Plan shall mean:
- (A) an eligible plan under Code Section 457(b) which is maintained by a state, political subdivision of a state, or any agency or instrumentality of a state or political subdivision of a state and which agrees to separately account for amounts transferred into such plan from this Plan;
 - (B) a traditional individual retirement account or annuity described in Code Section 408(a) or (b) (a “traditional IRA”);

- (C) for distributions after December 31, 2007, a Roth individual retirement account or annuity described in Code Section 408A (a “Roth IRA”);
- (D) an annuity plan described in Code Section 403(a);
- (E) an annuity contract described in Code Section 403(b); or
- (F) a qualified defined benefit or defined contribution plan described in Code Section 401(a),

that accepts the Distributee’s Eligible Rollover Distribution.

The definition of Eligible Retirement Plan shall also apply in the case of a distribution to a surviving Spouse, or to a Spouse or former Spouse who is the alternate payee under a qualified domestic relations order, as defined in Section 414(p) of the Code.

- (iii) Distributee. A Distributee includes a Participant or former Participant. In addition, the Participant’s or former Participant’s Eligible Surviving Spouse and the Participant’s or former Participant’s Spouse or former Spouse who is the alternate payee under a qualified domestic relations order, as defined in Section 414(p) of the Code, are Distributees with regard to the interest of the Spouse or former Spouse. For distributions occurring after December 31, 2009, a Distributee also includes a Participant’s nonspouse designated Beneficiary, in which case, a Direct Rollover will be made in accordance with the provisions of Section 6.6(c).
 - (iv) Direct Rollover. A Direct Rollover shall mean a payment by the Plan to the Eligible Retirement Plan specified by the Distributee.
- (c) Direct Rollover to a Nonspouse Beneficiary. Effective for distributions after December 31, 2009, a Participant’s nonspouse Beneficiary may elect to make a Direct Rollover of all or a portion of an Eligible Rollover Distribution to a traditional IRA or a Roth IRA that is established on behalf of the designated Beneficiary and that will be treated as an inherited IRA pursuant to the provisions of Code Section 402(c)(11). If a nonspouse Beneficiary receives a distribution from the Plan, the distribution is not eligible for a 60-day (non-direct) rollover. If the Participant’s named Beneficiary is a trust, the Plan may make a Direct Rollover to an IRA on behalf of the trust, provided the trust satisfies the requirements to be a Designated Beneficiary within the meaning of Code Section 401(a)(9)(E). A nonspouse Beneficiary may not roll over an amount that is a required minimum distribution, as determined under applicable Treasury regulations and other Internal Revenue Service guidance. If the Participant dies before his or her Required Beginning Date and the nonspouse Beneficiary rolls over to an IRA the maximum amount eligible for rollover, the Beneficiary may elect to use either the 5-year rule or the life expectancy rule, pursuant to Treasury Regulation §1.401(a)(9)-3, A-4(c), in determining the required minimum distributions from the IRA that receives the nonspouse Beneficiary’s distribution. The determination of any required minimum

distribution under Code Section 401(a)(9) that is ineligible for rollover shall be made in accordance with Notice 2007-7, Q&A 17 and 18, 2007-5 I.R.B. 395.

Section 6.7 Notice and Consent. Except for distributions made to a Participant in accordance with Section 5.5 for an amount not in excess of \$2,500, the following notice and consent requirements shall apply:

- (a) Effective for Annuity Starting Dates on or after February 1, 2006, no consent shall be valid unless the Participant has received a general description of the material features and an explanation of the relative values of the optional forms of benefit available under the Plan that would satisfy the notice requirements of Code Section 417 and Treasury Regulation §1.417(a)-3.
- (b) The Participant must be informed of the right to defer receipt of any distribution until the Participant's Accrued Benefit is no longer immediately distributable, and for plan years beginning after December 31, 2006, the consequences of failing to defer any distribution. If a Participant fails to consent, it shall be deemed an election to defer the commencement of payment of any benefit. However, any election to defer the receipt of benefits shall not apply with respect to distributions which are required under Section 6.5. An Accrued Benefit is immediately distributable if any part of the Accrued Benefit could be distributed to the Participant (or surviving Spouse) before the Participant attains (or would have attained if not deceased) the later of Normal Retirement Age or age 62.
- (c) The Trustees shall provide a notice required by §1.411(a)-11(c) of the Income Tax Regulations to each Participant, Eligible Surviving Spouse, or Spouse or former Spouse who is the alternate payee as described above, no less than 30 days and no more than 180 days before the Annuity Starting Date.

Notwithstanding the above, the Annuity Starting Date may be a date prior to the date the explanation is provided to the Participant if the distribution does not commence until at least thirty (30) days after such explanation is provided, subject to the waiver of the thirty (30) day period as provided for in Section 6.1(c).

- (d) Written (or such other form as permitted by the Internal Revenue Service) consent of the Participant to the distribution must not be made before the Participant receives the notice and must not be made more than 180 days before the Annuity Starting Date.

If a distribution is one to which the Qualified Joint and Survivor Annuity requirements under Sections 401(a)(11) and 417 of the Internal Revenue Code do not apply, such distribution may commence less than 30 days after the notice required under §1.411(a)-11(c) of the Income Tax Regulations is given, provided that:

- (i) the Trustees clearly inform the Participant that the Participant has a right to a period of at least 30 days after receiving the notice to consider the decision of whether or not to elect a distribution (and, if applicable, a particular distribution option), and
- (ii) the Participant, after receiving the notice, affirmatively elects a distribution.

ARTICLE VII

ADMINISTRATION OF THE PENSION PLAN

Section 7.1 The Trustees and their Authority. The Pension Plan shall be managed and administered solely by the Trustees, and the Trustees shall have power and authority to exercise their discretion in making decisions in all matters pertaining to the management and administration of the Pension Plan.

The Trustees shall have the right to decide in their sole and exclusive discretion all questions arising from or respecting the interpretation, application or administration of the Pension Plan including, but not limited to:

- (1) the rules of participation under the Pension Plan;
- (2) the rules of eligibility for benefits under the Pension Plan; and
- (3) the resolution of factual disputes in benefit or Beneficiary issues or disputes.

The decisions of the Trustees, and the exercise of their discretion, shall be final.

Any construction, interpretation, decisions or application of the Plan by the Trustees shall be conclusive and binding on all parties. The Trustees shall have full authority and discretion to construe the provisions of this Pension Plan and to determine their authority thereunder.

The Trustees shall also make such rules and prescribe such procedures for the administration of the Pension Plan as they shall deem necessary and reasonable.

The Trustees may authorize one or more of their members or any agent to act on their behalf and may contract for an investment manager, and actuarial, legal, investment advisory, medical, accounting, clerical and other services to carry-out the Pension Plan. The costs of such services and the expenses of the Trustees shall be paid from the Trust Fund including payment of required premiums to the Pension Benefit Guaranty Corporation under Title IV of ERISA, bonding required by ERISA, and insurance permitted by ERISA. The Trustees may rely upon valuations, certificates, opinions, and reports furnished by an appointed accountant, enrolled actuary, or legal counsel. The Trustees shall be fully protected in respect of any action taken or non-action by them in good faith in reliance upon any such valuations, certificates, reports, or opinions and all such actions or non-actions shall be conclusive upon all persons having or claiming to have any interest in the Pension Plan.

The Trustees shall discharge their duties under the Plan solely in the interest of the Participants in the Plan and their Beneficiaries and (1) for the exclusive purpose of providing benefits to such Participants and their Beneficiaries and defraying reasonable expenses of administering the Plan; (2) with the care, skill, prudence and diligence under the circumstances then prevailing that a prudent man acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims; and (3) in accordance with the provisions of the Plan insofar as they are consistent with the provisions of ERISA.

Section 7.2 Individual Consideration. It is hereby declared as the policy of the Trustees that consideration shall be given in any individual case or cases to extenuating circumstances not recited above, such as, but not limited to, reduced business activity, for the purpose of liberalizing the conditions which must be met by individuals. Any such liberalization shall be on a basis uniformly applicable to all individuals similarly situated.

Section 7.3 Rights Granted by Plan.

- (a) No Participant, Pensioner, Beneficiary or any person claiming by or through any such person, shall have any right, interest or title to any benefit under the Trust Agreement, the Pension Plan or the Trust Fund, except as such right, interest or title shall have been specifically granted pursuant to the terms of the Pension Plan.
- (b) The establishment of the Pension Plan shall not confer any legal rights upon any Employee or Participant for continuation of his employment nor shall it interfere with the right of the Employer with whom he is employed to discharge him and to treat him without regard to the effect that such treatment might have upon him as a Participant.

Section 7.4 Limitations Upon Beneficial Rights of Employees. All benefits, while undistributed and in the possession of the Trustees or their designee, even though vested or distributable, shall be free from the interference and control of any creditor. No benefits shall be subject to any assignment or other anticipation, nor to seizure or to sale under any legal, equitable or other process. In the event that any claim or benefit shall, because of any debt incurred by or resulting from any other claim or liability against any Participant, Pensioner, or Beneficiary, by reason of any sale, assignment, transfer, encumbrance, anticipation or other disposition made or attempted by said Participant, Pensioner, or Beneficiary, or by reason of any seizure or sale or attempted sale under any legal, equitable or other process, or in any suit or proceeding, become payable to any person other than the Participant, Pensioner or Beneficiary for whom the same is intended, as provided herein; pursuant hereto, the Trustees shall have power to withhold payment of such benefit to such Participant, Pensioner or Beneficiary until such assignment, transfer, encumbrance, anticipation or other disposition, writ or legal process is canceled or withdrawn in such manner as shall be satisfactory to the Trustees. Until so canceled or withdrawn, the Trustees shall have the right to use and apply the benefits as the Trustees may seem best, directly for the support and maintenance of such Participant, Pensioner, or Beneficiary.

This provision shall not apply to a "qualified domestic relations order" ("QDRO") defined in Code Section 414(p), and those other domestic relations orders permitted to be so treated by the Trustees under the provisions of the Retirement Equity Act of 1984. The Trustees shall establish a written procedure to determine the qualified status of domestic relations orders and to administer distributions under such qualified orders. Upon receipt of any such order the Trustees shall notify the Participant and any other alternate payee of the receipt of such domestic relations order and of the Plan's procedures for determining the status of such domestic relations orders as a QDRO. Each person specified in the order shall then be promptly notified of his/her entitlement to payment of benefits under the Plan (at the address included in the domestic relations order) and the alternate payee is permitted to designate a representative for receipt of copies of notices that are sent to the alternate payee with respect to a domestic relations order. Further, to the extent provided under a "qualified domestic relations order," a former Spouse of a Participant shall be treated as the Spouse or Eligible Surviving Spouse for all purposes under the Plan.

Effective April 6, 2007, a domestic relations order that otherwise satisfies the requirements for a qualified domestic relations order ("QDRO") will not fail to be a QDRO: (i) solely because the order is issued after, or revises, another domestic relations order or QDRO; or (ii) solely because of the time at which the order is issued, including issuance after the Annuity Starting Date or after the Participant's death. Such domestic relations order described above is subject to the same requirements and protections that apply to QDROs.

Effective January 1, 1998, this provision shall also not apply in the case of a conviction of a crime involving the Plan, or for a civil judgment (including a consent order or decree) or settlement agreement for violation of ERISA fiduciary rules in accordance with Code Section 401(a)(13)(C).

Section 7.5 Information to be Furnished. The Trustees shall have the right to require, as a condition precedent to the payment of any benefit under the Pension Plan, all information which they reasonably deem necessary, including, but not limited to, records of employment, proofs of dates of birth and death, and evidence of existence, and no benefit dependent in any way upon such information shall be payable unless and until the information so required shall be furnished. Such evidence shall be furnished by the Union, Employers, Participants, Pensioners, Beneficiaries and any other persons claiming to be entitled to any payment, as the Trustees may determine to be applicable.

If any Participant makes an inaccurate statement material to his application for benefits, an appropriate adjustment will be made on the correct facts when determined and the Trustees shall have the right, by setoff, against future payments due to such Employee, or by other means, to recover any overpayment made in reliance upon such inaccurate statement.

Section 7.6 Incompetence of Participant, Pensioner or Beneficiary. If any Participant, Pensioner or Beneficiary is, in the judgment of the Trustees, legally, physically or mentally, unable to care for his affairs, the Trustees may direct that any payment due (unless prior claim theretofore shall have been made by a duly qualified guardian or any other legal representative) be paid to the spouse, parent, brother or sister or other person deemed by the Trustees to be maintaining or have custody of the Participant, Pensioner or Beneficiary otherwise entitled to payment. Any such payment shall be a payment for the account of the Participant, Pensioner or Beneficiary and shall be a complete discharge of any liability of the Trust Fund and of the Trustees.

Section 7.7 Payment to Minor Beneficiary. If the Beneficiary of any Participant shall be a minor and no guardian shall have been appointed for him, the Trustees may retain any payment due under the Plan for his benefit until he attains majority. Such amount, as authorized by the Trustees, may be held in cash, deposited in bank accounts, or invested and reinvested in direct obligations of the United States, or retained in the Trust Fund, and the income thereon may be accumulated and invested, or the income and principal may be expended and applied directly for the maintenance, education and support of such minor without the intervention of any guardian and without application to any court.

Section 7.8 Small Benefits. At its discretion, the Board may direct that any monthly benefit under the Plan which is less than \$10 per month shall be paid quarterly, semi-annually, or annually in advance.

ARTICLE VIII

CLAIMS PROCEDURE

Section 8.1 Claims Review Procedure. When the claim of a Participant or Beneficiary (“Claimant”) is processed, it shall initially be the responsibility of the Administrator of the Fund to decide what benefit the Claimant is entitled to, in accordance with the benefit provided by the Plan. In the event that the claim is partially or totally denied, the Claimant shall, within a reasonable amount of time, but no later than 90 days following the Administrator’s receipt of the claim, be advised in writing by the Administrator of the reasons for said denial with specific references to pertinent Plan provisions and shall be given a description of any additional material or information necessary for the claim to be honored and an explanation of why such information or material is necessary. Such information shall include an explanation of the Plan’s claim review procedures and the time limits applicable to such procedures including a statement of the claimant’s right to bring a civil action under section 502(a) of ERISA following an adverse benefit determination on review. The information shall be provided in a manner calculated to be understood by the Claimant.

If, for special circumstances, additional time is needed by the Administrator to process a claim, the 90-day period may be extended but not beyond 180 days of the date the claim was originally filed. The Administrator shall notify the Claimant within the initial 90-day period that additional time is needed and explain the reason for the extension.

Section 8.2 Procedure to Appeal the Denial of Benefits. If the Claimant desires to appeal the denial of benefits, he or she shall communicate said desire to appeal to the Administrator of the Fund within 60 days of receipt of the written notice of denial. No special form of appeal is necessary, but said appeal shall be made in writing.

The Administrator of the Fund shall refer the appeal to the Board of Trustees. The Board of Trustees shall, if possible, hear the appeal at its next regular meeting, or at a specially convened meeting. The Board of Trustees shall have the right to delegate the power to conduct a hearing to one or more Trustees.

The Claimant may review pertinent documents and submit issues and comments in writing to the Board of Trustees. The Board shall provide the claimant or his representative, upon request and free of charge, reasonable access to and copies of all documents, records and other information relevant to the Claimant’s claim for benefits. The review by the Board shall take into account all comments, documents, records and other information submitted by the Claimant relating to the claim, without regard to whether such information was submitted or considered in the original benefit determination. At any such hearing, the Claimant shall be entitled to be present and to present his or her position and any evidence in support thereof. The Claimant may be represented at any such hearing by an attorney or by any other representative of his or her choosing at his or her own expense.

Not later than 120 days after the request for review of the denial of the claim, the Board of Trustees shall issue a written decision reaffirming, modifying or setting aside the Administrator’s or Board of Trustees’ prior determination or taking any other such action as the Trustees deem appropriate. The decision on review shall be in writing and shall include specific reasons for the decision, written in a manner

calculated to be understood by the Claimant and the specific references to the pertinent plan provisions on which the decision is based. The decision of the Board of Trustees shall be final and binding in the matter of the appeal.

Section 8.3 The procedures specified in this Article VIII shall be the sole and exclusive procedures available to a Participant or Beneficiary who is dissatisfied with an eligibility determination or benefit award by the Trustees.

ARTICLE IX

FUNDING AND FORFEITURES

Section 9.1 Contributions. No contributions shall be required under the Pension Plan of any Participant. All benefits shall be provided solely out of the Trust Fund created by Employer Contributions. Such Employer Contributions shall be in an amount as determined from time to time in accordance with the Collective Bargaining Agreement in force and the Joinder. The Union shall make Contributions at a like rate with respect to its Employees under the Plan.

Section 9.2 Timing of Contributions. For the purpose of funding the Plan, each Employer shall make periodic Contributions to the Trust, in accordance with its Collective Bargaining Agreement with the Union or with its agreement with the Trustees. Each Employer shall make its Contributions on or before the twentieth day of the month after the end of the calendar month for which they are payable, and shall submit to the Board each month a summary report of Contributions and of shift records for its Employees under the Plan, which shall be made available to the Union for inspection.

Section 9.3 Trust Fund.

- (a) Such Contributions shall be paid into the Trust Fund to be held by the Trustees. A corporate trustee may be appointed by the Trustees to invest such Contributions and to pay the pensions provided for in this Plan as directed by the Trustees.
- (b) The Trust Fund shall be used only to pay pensions as provided for in this Plan and to defray the reasonable expenses of the Plan pursuant to authorization by the Trustees, including any actuarial, administrative, accounting and legal services and compensation of the corporate trustee.

Section 9.4 Employer Liability.

- (a) Except as provided by ERISA, no Employer shall be subject to any liability under the Plan except to the extent of its contribution commitment under its Collective Bargaining Agreement and its Joinder.
- (b) Payment by an Employer of its Contributions as provided in Section 9.1 hereof shall be in complete discharge of such Employer's financial obligation under the Plan and it shall have no liability in respect of any Contributions due by any other Employer. Non-payment by such Employer of its Contributions shall not relieve any other Employer from the obligation to make payment of its contribution hereunder. If the participation of an Employer shall be terminated for any reason, it shall have no liability for any future payments to the Trust, but shall remain liable for all past payments due, any required reports and any withdrawal liability under ERISA.

Section 9.5 Mistake of Fact or Law. Pursuant to the Trustees' discretion, any contribution made by an Employer by mistake of fact or law may be refunded to the Employer within six (6) months after the Trustees determine that the contribution was made by mistake.

Section 9.6 Forfeitures. Forfeitures shall not be used to increase the benefits that any Employee would otherwise receive under the Plan at any time prior to the termination of the Plan or the complete discontinuance of Contributions to the Plan, but shall be anticipated in determining the costs under the Plan.

ARTICLE X

AMENDMENT AND TERMINATION OF PENSION PLAN

Section 10.1 Amendment of the Pension Plan. The Board of Trustees may at any time modify, alter or amend the Pension Plan in any respect, retroactively or otherwise by a written instrument signed by the Trustees; provided, however, that it is the intent of all parties to the Pension Plan that at all times the Pension Plan and the Trust Fund shall conform to all applicable laws, and any regulations or rulings issued with respect thereto, including but not limited to, ERISA and the Labor Management Relations Act of 1947, as amended, and that the Pension Plan and the Trust Fund shall meet the requirements for a “qualified” plan and a tax-exempt trust under the provisions of the Internal Revenue Code as now in force or as hereafter amended or superseded, and further that Employer Contributions to the Trust Fund shall be deductible by the Employers for income tax purposes. At no time shall an amendment

- (a) reduce the Accrued Benefit or the vested Retirement Benefit of any Participant under the Plan at the date the amendment is adopted, except as may be permitted by the United States Department of Labor, or
- (b) divert any part of the assets of the Trust Fund to purposes other than for the exclusive benefit of Participants, Pensioners, Surviving Spouses, Joint Annuitants or Beneficiaries who have an interest in the Plan.

For purposes of this paragraph, a plan amendment (including a change in the actuarial basis for determining optional or early retirement benefits) which has the effect of (1) eliminating or reducing an Early Retirement Benefit or a retirement-type subsidy, or (2) eliminating an optional form of benefit, with respect to benefits attributable to service before the amendment shall be treated as reducing Accrued Benefits. In the case of a retirement-type subsidy, the preceding sentence shall apply only with respect to a Participant who satisfies (either before or after the amendment) the pre-amendment conditions for the subsidy. In general, a retirement-type subsidy is a subsidy that continues after retirement, but does not include a qualified disability benefit, a medical benefit, a social security supplement, a death benefit (including life insurance), or a plant shutdown benefit (that does not continue after retirement age). Notwithstanding the preceding sentences, a Participant's Accrued Benefit, early retirement benefit, retirement-type subsidy, or optional form of benefit may be reduced to the extent permitted under Code Section 412(c)(8) (for plan years beginning on or before December 31, 2007) or Code Section 412(d)(2) (for plan years beginning after December 31, 2007), or to the extent permitted under §§1.411(d)-3 and 1.411(d)-4 of the Treasury Regulations. For purposes of this paragraph, a retirement-type subsidy is the excess, if any, of the actuarial present value of a retirement-type benefit over the actuarial present value of the Accrued Benefit commencing at Normal Retirement Age or at actual commencement date, if later, with both such actuarial present values determined as of the date the retirement-type benefit commences.

Notwithstanding the above, effective for plan years beginning on or after January 1, 2008, if the status for a multiemployer plan is certified as “critical” by the Actuary, reductions may be made to “adjustable benefits” in accordance with a Rehabilitation Plan adopted by the Board of Trustees, as permitted under Section 432 of the Code.

Section 10.2 Termination of the Pension Plan. The Trustees may at any time terminate the Pension Plan in accordance with the terms of this Plan and the Trust Agreement and subject to the terms and conditions of the Collective Bargaining Agreement by a written instrument signed by the Trustees.

Section 10.3 Partial Termination. Upon the withdrawal or exclusion from the Plan of a group of Participants which constitutes a partial termination of the Plan, the Trustees shall allocate and segregate for the benefit of the Participants with respect to which the Plan is being terminated the proportionate interest of such Participants in the Trust Fund. Such proportionate interest shall be determined by the Actuary. The Actuary shall make this determination on the basis of the provisions of this Article and such other considerations as the Actuary deems appropriate. The funds so allocated and segregated shall be used by the Trustees to pay benefits to or on behalf of Participants in accordance with Section 10.4.

Section 10.4 Application of Trust Fund. Upon termination of the Plan, or upon withdrawal or exclusion of a group of Participants constituting a partial termination of the Plan, each such Participant's benefit, determined prior to the date of termination, shall become fully vested and non-forfeitable to the extent funded. The assets of the Trust Fund, or the portion thereof segregated in accordance with Section 10.3 shall be applied (after provision is made for the expenses of such application) by the payment or provision for the payment of benefits in the following order of preference:

- (a) Certain Benefits Payable Three Years Prior to Termination. First, to provide benefits that become payable three or more years before the date of termination of the Plan, or would have become payable as of the beginning of such three-year period had the Participant retired prior to the beginning of such three-year period, provided that
 - (i) the portion of the Retirement Benefits payable to a Participant or the Beneficiary of a Participant (or that would have been payable) shall be based on the provisions of the Plan in effect during the five year period immediately preceding the date of termination of the Plan under which such Retirement Benefits would be the least; and further provided that,
 - (ii) the lowest benefit payable during such three-year period in accordance with subparagraph (i) shall be considered the benefit payable for purposes of this category (a).
- (b) Other Benefits Eligible for Termination Insurance. Second, to the extent that the amount of a Retirement Benefit has not been provided in the foregoing category (a), the remaining assets shall be allocated to provide any Retirement Benefit provided under the Plan for Participants and Beneficiaries to the extent guaranteed by the Pension Benefit Guaranty Corporation pursuant to Title IV of ERISA.
- (c) Other Benefits. To the extent that the amount of a Retirement Benefit has not been provided in the foregoing categories, the remaining assets shall be allocated to provide all other non-forfeitable benefits under the Plan and, finally, to provide all other benefits under the Plan.

If the assets of the Trust Fund applicable to any of the above categories are insufficient to provide full benefits for all persons in such group, the benefits otherwise payable to such persons shall be allocated pro rata on the basis of the present value of benefits as of the termination date. The Trustees are authorized to set up subcategories within the above categories of priority of payment. The Actuary shall calculate the allocation of the assets of the Trust Fund in accordance with the above priority categories, and certify his calculations to the Trustees.

Section 10.5 Finality of Payment. Prior to making any distribution under the terms of Section 10.4, the Trustees shall satisfy themselves that this procedure complies with applicable law and shall obtain such waivers and authorizations from Participants or others as they deem advisable.

Section 10.6 Non-Diversion of Assets. No part of the assets of the Trust Fund, by reason of any amendment or otherwise, shall at any time be used for, or diverted to, purposes other than for the exclusive benefit of Participants, former Participants, or their Beneficiaries, and for the payment of administrative expenses under the Plan, or as will cause or permit the assets of the Trust Fund to revert to or become the property of the Covered Employers except as otherwise provided herein or when all obligations to all persons under the Plan have been fully satisfied.

Section 10.7 Merger and Consolidation of Plan, Transfer of Plan Assets. In the case of any merger or consolidation with, or transfer of assets and liabilities to, any other plan, provisions shall be made so that each Participant in the Plan on the date thereof shall receive a benefit immediately after the merger, consolidation or transfer which is equal to, or greater than, the benefit he would have been entitled to receive immediately prior to the merger, consolidation or transfer if the Plan had then terminated.

ARTICLE XI

MAXIMUM LIMITATIONS ON INDIVIDUAL RETIREMENT BENEFITS

Section 11.1 Limitation on Benefits and Final 415 Regulations.

- (a) Final 415 Regulations. The limitations in this Article XI shall apply for Limitation Years beginning on or after July 1, 2007, except as otherwise provided herein.
- (1) Incorporation by reference. The limitations, adjustments, and other requirements prescribed in the Plan shall comply with the provisions of Code Section 415 and the final Regulations promulgated thereunder, the terms of which are specifically incorporated herein by reference for Limitation Years beginning on or after July 1, 2007, except where an earlier effective date is otherwise provided in the final Regulations or in this Article XI. However, where the final Regulations permit the Plan to specify an alternative option to a default option set forth in the Regulations, and the alternative option was available under statutory provisions, Regulations, and other published guidance relating to Code Section 415 as in effect prior to April 5, 2007, and the Plan provisions in effect as of April 5, 2007 incorporated the alternative option, said alternative option shall remain in effect as a Plan provision for Limitation Years beginning on or after July 1, 2007 unless another permissible option is indicated below.
- (2) Grandfather provision. The application of the provisions of this Article XI shall not cause the Maximum Annual Benefit for any Participant to be less than the Participant's accrued benefit under all the defined benefit plans of the Employer or a predecessor employer as of the end of the last Limitation Year beginning before July 1, 2007 under provisions of the plans that were both adopted and in effect before April 5, 2007. The preceding sentence applies only if the provisions of such defined benefit plans that were both adopted and in effect before April 5, 2007 satisfied the applicable requirements of statutory provisions, Regulations, and other published guidance relating to Code Section 415 in effect as of the end of the last Limitation Year beginning before July 1, 2007, as described in Regulation §1.415(a)-1(g)(4).
- (b) Limit on Accrued Benefits. The Annual Benefit otherwise payable to a Participant under this Plan at any time shall not exceed the Maximum Annual Benefit, as defined in Section 11.2(e) of this Article XI. If the benefit the Participant would otherwise accrue in a Limitation Year would produce an Annual Benefit in excess of the Maximum Annual Benefit, the benefit shall be limited (or the rate of accrual reduced) to the extent necessary so that the benefit does not exceed the Maximum Annual Benefit.

Section 11.2 Definitions.

- (a) Annual Benefit. For purposes of this Article XI, “Annual Benefit” shall mean the benefit payable annually under the terms of the Plan (exclusive of any benefit not required to be considered for purposes of applying the limitations of Code Section 415 to the Plan) payable in the form of a straight life annuity with no ancillary benefits. If the benefit under the Plan is payable in any other form, before applying the limitations of this Article XI, the Annual Benefit shall be adjusted, pursuant to Section 11.3(d), to an actuarially equivalent straight life annuity that begins at the same time as such other form of benefit and is payable on the first day of each month. For a Participant who has or will have distributions commencing at more than one Annuity Starting Date, the Annual Benefit shall be determined as of each such Annuity Starting Date (and shall satisfy the limitations of this Article XI as of each such date), actuarially adjusted for past and future distributions of benefits commencing at the other Annuity Starting Dates. For this purpose, the determination of whether a new starting date has occurred shall be made without regard to Regulation §1.401(a)-20, Q&A 10(d), and with regard to Regulation §1.415(b)-1(b)(1)(iii)(B) and (C).

For purposes of this Section 11.2(a), no actuarial adjustment to the benefit is required for (1) the value of a qualified joint and survivor annuity, (2) benefits that are not directly related to retirement benefits (such as a qualified disability benefit, pre-retirement incidental death benefits, and post-retirement medical benefits), and (3) the value of post-retirement cost-of-living increases made in accordance with Code Section 415(d) and Regulation §1.415-3(c)(2)(iii). The Annual Benefit does not include any benefits attributable to Employee contributions or rollover contributions, or the assets transferred from a qualified plan that was not maintained by the Employer.

- (b) Defined Benefit Dollar Limitation. Effective for Limitation Years ending after December 31, 2001, the “Defined Benefit Dollar Limitation” is \$160,000, automatically adjusted under Code Section 415(d), effective January 1 of each year, as published in the Internal Revenue Bulletin, and payable in the form of a straight life annuity. Such dollar limitation as adjusted under Code Section 415(d) will apply to Limitation Years ending with or within the calendar year for which the adjustment applies, but a Participant’s benefit shall not reflect the adjusted limit prior to January 1 of that calendar year. In the case of a Participant who has had a severance from employment with the Employer, the Defined Benefit Dollar Limitation applicable to the Participant in any Limitation Year beginning after the date of severance shall not be automatically adjusted under Code Section 415(d).
- (c) Employer. For the purpose of this Article XI, if the Employer is a member of a controlled group of corporations, trades or businesses under common control (as defined by Code Section 1563(a) or Code Section 414(b) and (c) as modified by Code Section 415(h)), or is a member of an affiliated service group (as defined by Code Section 414(m)), or is required to be aggregated with an entity pursuant to Code Section

414(o), all Employees of such Employers shall be considered to be employed by a single Employer.

- (d) Limitation Year. For purposes of applying the limitations of Code Section 415, the “Limitation Year” shall be the Plan Year. All qualified plans maintained by the Employer must use the same Limitation Year. If the Limitation Year is amended to a different twelve (12) consecutive month period, the new Limitation Year must begin on a date within the Limitation Year in which the amendment is made.
- (e) Maximum Annual Benefit. A Participant’s “Maximum Annual Benefit” under this multiemployer plan, as defined in Section 414(f) of the Code, is the Defined Benefit Dollar Limitation adjusted as required pursuant to Sections 11.3(a), (b), and/or (c).

Section 11.3 Adjustments to Annual Benefit and Limitations.

- (a) Adjustment for less than 10 years of participation. If a Participant has less than 10 years of participation in the Plan, then the Defined Benefit Dollar Limitation of Section 11.2(b) shall be multiplied by a fraction, (1) the numerator of which is the number of years (or part thereof) of participation in the Plan, and (2) the denominator of which is 10. However, in no event shall such fraction be less than 1/10th.

Year of Participation. For purposes of this Subsection (a), “year of participation” shall mean each accrual computation period for which the following conditions are met: (1) the Participant is credited with at least the number of Hours of Service for benefit accrual purposes, required under the terms of the Plan in order to accrue a benefit for the accrual computation period, and (2) the Participant is included as a Participant under the eligibility provisions of the Plan for at least one day of the accrual computation period. If these two conditions are met, the portion of a year of participation credited to the Participant shall equal the amount of benefit accrual service credited to the Participant for such accrual computation period. A Participant who is permanently and totally disabled within the meaning of Code Section 415(c)(3)(C)(i) for an accrual computation period shall receive a year of participation with respect to the period. In addition, for a Participant to receive a year of participation (or part thereof) for an accrual computation period, the Plan must be established no later than the last day of such accrual computation period. In no event will more than one year of participation be credited for any 12-month period.

- (b) Adjustment For Benefit Commencement Before Age 62. Effective for benefits commencing in Limitation Years ending after December 31, 2001, if the Annuity Starting Date for the Participant’s benefit is prior to age 62, the Defined Benefit Dollar Limitation of Section 11.2(b) at the Participant’s Annuity Starting Date is the annual amount of a benefit payable in the form of a straight life annuity that is the actuarial equivalent of the Defined Benefit Dollar Limitation beginning at age 62 (adjusted under Section 11.3(a) for years of participation less than 10, if required). For this purpose, the Defined Benefit Dollar Limitation of Section 11.2(b) applicable

at an age prior to age 62 is computed by using the lesser of the actuarial equivalent (at such age) of the Defined Benefit Dollar Limitation computed using (1) the interest rate and mortality table (or other tabular factor) specified in Section 1.2, and (2) a 5 percent (5%) interest rate assumption and the "Applicable Mortality Table," as defined in Section 1.2. Any decrease in the Defined Benefit Dollar Limitation of Section 11.2(b) determined in accordance with this paragraph shall not reflect a mortality decrement if benefits are not forfeited upon the death of the Participant. If any benefits are forfeited upon death, the full mortality decrement is taken into account.

Notwithstanding any other provisions of this Section 11.3(b), the age-adjusted dollar limit applicable to a Participant shall not decrease on account of an increase in age or the performance of additional services.

- (c) Adjustment For Benefit Commencement After Age 65. Effective for benefits commencing in Limitation Years ending after December 31, 2001, if the Annuity Starting Date for the Participant's benefit is after age 65, the Defined Benefit Dollar Limitation of Section 11.2(b) at the Participant's Annuity Starting Date is the annual amount of a benefit payable in the form of a straight life annuity that is the actuarial equivalent of the Defined Benefit Dollar Limitation beginning at age 65 (adjusted under Section 11.3(a) for years of participation less than 10, if required). For this purpose, the Defined Benefit Dollar Limitation of Section 11.2(b) applicable at an age after age 65 is computed by using the lesser of the actuarial equivalent (at such age) of the Defined Benefit Dollar Limitation computed using (1) the interest rate and mortality table (or other tabular factor) specified in Section 1.2, and (2) a 5 percent (5%) interest rate assumption and the "Applicable Mortality Table," as defined in Section 1.2. For these purposes, mortality between age 65 and the age at which benefits commence shall be ignored.
- (d) Adjustment For Benefit Forms Other Than Straight Life Annuity. Effective for distributions in plan years beginning after December 31, 2003, the determination of actuarial equivalence of forms of benefit other than a straight life annuity shall be made in accordance with Section 11.3(d)(1) or Section 11.3(d)(2).
 - (1) Benefit Forms Not Subject to Code Section 417(e)(3). The straight life annuity that is actuarially equivalent to the Participant's form of benefit shall be determined under this Section 11.3(d)(1) if the form of the Participant's benefit is either (1) a nondecreasing annuity (other than a straight life annuity) payable for a period of not less than the life of the Participant (or, in the case of a qualified pre-retirement survivor annuity, the life of the surviving Spouse), or (2) an annuity that decreases during the life of the Participant merely because of (a) the death of the survivor annuitant (but only if the reduction is not below 50% of the benefit payable before the death of the survivor annuitant), or (b) the cessation or reduction of Social Security

supplements or qualified disability payments (as defined in Code Section 401(a)(11)).

- (A) Limitation Years beginning before July 1, 2007. For Limitation Years beginning before July 1, 2007, the actuarially equivalent straight life annuity is equal to the annual amount of the straight life annuity commencing at the same Annuity Starting Date that has the same actuarial present value as the Participant's form of benefit computed using whichever of the following produces the greater annual amount: (i) the Plan interest rate and Plan mortality table (or other tabular factor) specified in Section 1.2 for adjusting benefits in the same form; and (ii) a five percent (5%) interest rate assumption and the "Applicable Mortality Table" as defined in Section 1.2 for that Annuity Starting Date.
 - (B) Limitation Years beginning on or after July 1, 2007. For Limitation Years beginning on or after July 1, 2007, the actuarially equivalent straight life annuity is equal to the greater of (1) the annual amount of the straight life annuity (if any) payable to the Participant under the Plan commencing at the same Annuity Starting Date as the Participant's form of benefit; and (2) the annual amount of the straight life annuity commencing at the same Annuity Starting Date that has the same actuarial present value as the Participant's form of benefit, computed using a five percent (5%) interest rate assumption and the "Applicable Mortality Table" as defined in Section 1.2 for that Annuity Starting Date.
- (2) Benefit Forms Subject to Code Section 417(e)(3). The straight life annuity that is actuarially equivalent to the Participant's form of benefit shall be determined under this Section 11.3(d)(2) if the form of the Participant's benefit is other than a benefit form described in Section 11.3(d)(1). In this case, the actuarially equivalent straight life annuity shall be determined as follows:
- (A) Annuity Starting Date in Plan Years Beginning After 2005. If the Annuity Starting Date of the Participant's benefit occurs during a plan year beginning after 2005, the actuarially equivalent straight life annuity is equal to the greatest of (i) the annual amount of the straight life annuity commencing at the same Annuity Starting Date that has the same actuarial present value as the Participant's form of benefit, computed using the Plan interest rate and Plan mortality table (or other tabular factor) specified in Section 1.2 for adjusting benefits in the same form; (ii) the annual amount of the straight life annuity commencing at the same Annuity Starting Date that has the same

actuarial present value as the Participant's form of benefit, computed using a five and one-half percent (5.5%) interest rate assumption and the "Applicable Mortality Table," as defined in Section 1.2; and (iii) the annual amount of the straight life annuity commencing at the same Annuity Starting Date that has the same actuarial present value as the Participant's form of benefit, computed using the "Applicable Interest Rate" and the "Applicable Mortality Table," as defined in Section 1.2, divided by 1.05. However, effective for benefits with Annuity Starting Dates during Limitation Years beginning after December 31, 2008, the annual amount under (iii) of this Subsection (A) does not apply to a plan maintained by an eligible employer under Code Section 408(p)(2)(C)(i).

- (B) Annuity Starting Date in Plan Years Beginning in 2004 or 2005. If the Annuity Starting Date of the Participant's form of benefit is in a plan year beginning in 2004 or 2005, the actuarially equivalent straight life annuity is equal to the annual amount of the straight life annuity commencing at the same Annuity Starting Date that has the same actuarial present value as the Participant's form of benefit, computed using whichever of the following produces the greater annual amount: (i) the Plan interest rate and Plan mortality table (or other tabular factor) specified in Section 1.2 for adjusting benefits in the same form; and (ii) a five and one-half percent (5.5%) interest rate assumption and the "Applicable Mortality Table," as defined in Section 1.2.

Section 11.4 Other Rules. The limitations of this Article XI shall be determined and applied taking into account the following rules:

- (a) Minimum Annual Benefit. This Plan may pay a benefit to any Participant in excess of the Participant's Maximum Annual Benefit if the Annual Benefit derived from Employer contributions under this Plan and all other defined benefit plans maintained by the Employer as a result of collective bargaining involving the same employee representative as this multiemployer Plan does not in the aggregate exceed \$10,000 for the Limitation Year or for any prior Limitation Year and the Employer has not at any time maintained a defined contribution plan, a welfare benefit fund under which amounts attributable to post-retirement medical benefits are allocated to separate accounts of key employees (as defined in Code Section 419(A)(d)(3)), or an individual medical account in which the Participant participated. For purposes of this paragraph, if this Plan provides for voluntary or mandatory Employee contributions, such contributions will not be considered a separate defined contribution plan maintained by the Employer.

However, if a Participant has fewer than 10 years of service with the Employer, then the \$10,000 threshold of the previous paragraph shall be multiplied by a fraction,

(1) the numerator of which is the number of years (or part thereof) of Credited Service with the Employer, as defined in Section 3.3 for purposes of determining benefit accrual, and (2) the denominator of which is 10. However, in no event shall such fraction be less than 1/10th.

- (b) Aggregation of Plans. A multiemployer plan, as defined under Section 414(f) of the Code, is not aggregated with any other multiemployer plan for purposes of any Code Section 415 dollar or compensation limitations. For Plan Years beginning on or after January 1, 2002, the Plan is no longer aggregated with any other non-multiemployer plan for purposes of applying the Code Section 415(b)(1)(B) compensation limit to the non-multiemployer plan.
- (c) Effect on Participants of EGTRRA Increase in Code Section 415(b) Limitations. Effective for Limitation Years ending after December 31, 2001, benefit increases resulting from the increase in the limitations of Code Section 415(b) on account of the Economic Growth and Tax Relief Reconciliation Act of 2001 (EGTRRA) will be provided to all Employees participating in the Plan who have one Hour of Service on or after the first day of the first Limitation Year ending after December 31, 2001.

ARTICLE XII

GENERAL PROVISIONS

Section 12.1 Law Applicable. All questions pertaining to the validity or construction of this Pension Plan and of the acts and transactions of the parties hereto shall be determined in accordance with the laws of the Commonwealth of Pennsylvania and applicable Federal law.

Section 12.2 Savings Clause. Should any provision of this Pension Plan be held to be unlawful, or unlawful as to any person or instance, such fact shall not adversely affect the other provisions herein contained or the application of said provisions to any other person or instance, unless such illegality shall make impossible the functioning of this Plan or the Trust Fund. The provision or provisions held illegal or invalid shall be fully severable and this Pension Plan shall be construed and enforced as if said provisions had never been inserted herein.

Section 12.3 Withholding Payment. In the event any question or dispute shall arise as to the proper person or persons to whom any payment shall be made hereunder, the Trustees may withhold such payment until there shall have been made an adjudication of such question or dispute which, in the Trustees' sole judgment, is satisfactory to them, or until the Trustees shall have been fully protected against loss by means of such indemnification agreement or bond as they, in their sole judgment, determine to be adequate.

Section 12.4 Gender and Number. Whenever any words are used in this Pension Plan in the masculine gender, they shall also be construed to include the feminine or neuter gender in all situations where they would so apply and whenever any words are used in the plural, they shall also be construed to include the singular.

Section 12.5 Article and Section Titles. The Article and Section titles are included solely for convenience and in no event shall be construed to affect or modify any part of the provisions of this Pension Plan or be construed as part thereof.

Section 12.6 Counterparts. This Pension Plan and any amendments hereto may be executed in one or more counterparts. The signature of a party on any counterpart shall be sufficient evidence of his execution thereof.

ARTICLE XIII

TOP-HEAVY PLAN PROVISIONS

Section 13.1 Top-Heavy Plan Requirements. For any Plan Year beginning after December 31, 2001 in which the Plan is considered a Top-Heavy Plan, the Plan shall provide the vesting requirements of Code Section 416(b) and Section 13.3 of the Plan and the minimum benefit requirements pursuant to Code Section 416(c) and Section 13.4 of the Plan.

Section 13.2 Definitions.

- (a) **“Aggregate Account”** A Participant’s Aggregate Account as of the Determination Date shall be determined under the applicable provisions of any defined contribution plans used in determining Top-Heavy Plan status.
- (b) **“Aggregation Group”** shall mean either a Required Aggregation Group or a Permissive Aggregation Group determined as follows:

The **“Required Aggregation Group”** of an Employer includes (1) each qualified plan of an Employer in which at least one Key Employee participates or participated at any time during the determination period (regardless of whether the plan has terminated), and (2) each other qualified plan of the Employer that enables a plan covering a Key Employee to meet the nondiscrimination requirements of Internal Revenue Code Sections 401(a)(4) or 410. Each plan in a Required Aggregation Group will be Top-Heavy if the group is Top-Heavy. No plan in a Required Aggregation Group will be Top-Heavy if the group is not Top-Heavy.

A **“Permissive Aggregation Group”** consists of plans that are required to be aggregated plus one or more plans (providing comparable benefits or contributions) that are not required to be aggregated, all of which, when taken together, meet the requirements of the Internal Revenue Code Sections 401(a)(4) and 410. If a Permissive Aggregation Group is Top-Heavy, only those plans that are part of an underlying Top-Heavy Required Aggregation Group are Top-Heavy. No plan in a Permissive Aggregation Group will be Top-Heavy if the group is not Top-Heavy.

Only those plans of the Employer in which the Determination Dates fall within the same calendar year shall be aggregated in order to determine whether such plans are Top-Heavy Plans.

An Aggregation Group shall include any terminated plan of the Employer if it was maintained within the last five (5) years ending on the Determination Date.

- (c) **“Determination Date”** shall mean, with respect to any Plan Year beginning after December 31, 1983, the last day of the preceding Plan Year.

- (d) “415 Compensation” shall mean the Participant’s wages for Federal income tax withholding under Section 3401(a) of the Code (determined without regard to any rules that limit the remuneration included in wages based on the nature or location of the employment or the services performed) and actually paid to the Participant during the Limitation Year, including any elective deferral (as defined in Code Section 402(g)(3)), and any amount which is contributed by the Employer at the election of the Participant pursuant to a salary reduction agreement and which is not includible in the gross income of the Participant by reason of Code Sections 125, 132(f)(4), 402(e)(3), 402(h)(1)(B), 403(b) or 457(b), and Employee contributions described in Code Section 414(h)(2) that are treated as Employer contributions. For this purpose, effective as of January 1, 1998, amounts not includible in gross income under Section 125 of the Code shall be deemed to include any amounts not available to a Participant in lieu of group health coverage because the Participant is unable to certify that he has other health coverage provided the Employer does not otherwise request or collect information regarding the Participant’s other health coverage as part of the enrollment process for its health plan.

Effective for Limitation Years beginning on or after July 1, 2007, “415 Compensation” for a Limitation Year shall not include compensation in excess of the limitation under Code Section 401(a)(17) that is in effect for the calendar year in which such Limitation Year begins.

Effective for Limitation Years beginning on or after July 1, 2007, “415 Compensation” within the meaning of Section 415(c)(3) of the Code shall include the following types of compensation paid after a Participant’s severance from employment with the Employer provided such amounts are paid by the later of 2-1/2 months after severance from employment or by the end of the Limitation Year that includes the date of such severance from employment, if

- (1) the payment is regular compensation for services during the Participant’s regular working hours, or compensation for services outside the Participant’s regular working hours (such as overtime or shift differential), commissions, bonuses, or other similar payments, and the payment would have been paid to the Participant prior to a severance from employment if the Participant had continued in employment with the Employer;
- (2) the payment is for unused accrued bona fide sick, vacation, or other leave that the Participant would have been able to use if employment had continued; or
- (3) the payment is received by the Participant pursuant to a nonqualified unfunded deferred compensation plan, but only if the payment would have been paid at the same time if the Participant had continued employment with the Employer and only to the extent that the payment is includible in the Participant’s gross income.

Any payments not described above shall not be considered “415 Compensation” if paid after severance from employment, even if they are paid by the later of 2-1/2 months after the date of severance from employment or the end of the Limitation Year that includes the date of severance from employment. Back pay, within the meaning of Treasury Regulation §1.415(c)-2(g)(8), shall be treated as compensation for the Limitation Year to which the back pay relates to the extent the back pay represents wages and compensation that would otherwise be included under this definition. The following items are specifically excluded from “415 Compensation”:

- (i) payments to an individual who does not currently perform services for the Employer by reason of qualified military service (within the meaning of Section 414(u)(1) of the Code), but on and after January 1, 2009, the exclusion applies only to the extent these payments exceed the amounts the individual would have received if the individual had continued to perform services for the Employer rather than entering qualified military service; and
 - (ii) compensation paid to a Participant who is permanently and totally disabled, as defined in Section 22(e)(3) of the Code.
- (e) “Key Employee” shall mean those Employees defined in Code Section 416(i)(1) and the Regulations thereunder. Generally, they shall include any Employee or former Employee (including a deceased Employee) who at any time during the Plan Year that includes the Determination Date is (or was):
- (1) an officer of the Employer, having annual “415 Compensation” greater than \$130,000 (as adjusted under Code Section 416(i)(1) for Plan Years beginning after December 31, 2002);
 - (2) a 5-percent owner of the Employer; or
 - (3) a 1-percent owner of the Employer having annual “415 Compensation” greater than \$150,000.
- (f) “Top-Heavy Plan” This Plan shall be a Top-Heavy Plan for any Plan Year in which, as of the Determination Date, the sum of the Present Value of Accrued Benefits of Key Employees, and the Aggregate Accounts of Key Employees under this Plan and all plans in the Aggregation Group is greater than 60% of the Present Value of Accrued Benefits and Aggregate Accounts of all Key and non-Key Employees under this Plan and all plans in the Aggregation Group.

If any Participant is a non-Key Employee for any Plan Year, but such Participant was a Key Employee for any prior Plan Year, such Participant’s Present Value of Accrued Benefit and/or Aggregate Account shall not be taken into account for purposes of determining whether this Plan is a Top-Heavy Plan (or whether any Aggregation Group which includes this Plan is a Top-Heavy Group). In addition, for Plan Years

beginning after December 31, 2001, if a Participant or Former Participant has not performed any services for any Employer participating in the Plan at any time during the one-year period ending on the Determination Date, the Present Value of Accrued Benefit for such Participant or Former Participant shall not be taken into account for the purposes of determining whether this Plan is a Top-Heavy Plan.

The calculation of a Participant's Present Value of Accrued Benefit as of a Determination Date shall be the sum of:

- (1) the Present Value of Accrued Benefits, based on the UP-1984 Mortality Table and a five percent (5%) interest rate, determined as of the most recent actuarial valuation date which occurs within the 12-month period ending on the Determination Date; and
- (2) any distributions made within the Plan Year under the Plan and any plan aggregated with the Plan under Code Section 416(g)(2) during the one-year period ending on the Determination Date (during the five-year period for distributions made for a reason other than severance from employment, death or disability). However, in the case of distributions made after the valuation date and prior to the Determination Date, such distributions are not included as distributions for Top-Heavy purposes to the extent that such distributions are already included in the Participant's Present Value of Accrued Benefit as of the valuation date. Notwithstanding anything herein to the contrary, all distributions, including distributions made prior to January 1, 1984, and distributions under a terminated plan which, if it had not been terminated, would have been required to be included in an Aggregation Group, will be counted. Further, benefits paid on account of death, to the extent such benefits do not exceed the Present Value of Accrued Benefits existing immediately prior to death, shall be treated as distributions for the purpose of this paragraph.

For a Participant other than a Key Employee, the Present Value of Accrued Benefit shall be determined using the single accrual method used for all plans of the Employer and Affiliated Employers, or if no such single method exists, using a method which results in benefits accruing not more rapidly than the slowest accrual rate permitted under Code Section 411(b)(1)(C).

Section 13.3 Vesting Requirement. For any Plan Year in which the Plan is Top-Heavy, a Participant shall have a non-forfeitable right to receive a Deferred Vested Retirement Benefit if his employment is terminated before death or retirement after he has completed at least two (2) years of Service for vesting purposes. The amount of his Deferred Vested Retirement Benefit shall be equal to the vested percentage of his Accrued Benefit determined in accordance with the following table:

<u>Years of Service</u>	<u>Non-Forfeitable Percentage</u>
2	20%
3	40%
4	60%
5	80%
6 or more	100%

If in any subsequent Plan Year, the Plan ceases to be a Top-Heavy Plan, the Trustees shall revert to the vesting schedule in effect before this Plan became a Top-Heavy Plan. Any such reversion shall be treated as a Plan amendment pursuant to the terms of Section 4.6.

Section 13.4 Minimum Benefit. Each Participant who is a non-Key Employee shall be entitled to a minimum benefit equal to two percent (2%) of his average “415 Compensation” for the highest five consecutive Limitation Years (or actual number of Limitation Years, if less) multiplied by the number of years of Credited Service (1000 Hours of Service in a Plan Year) during which the Plan is considered a Top-Heavy Plan. The amount of this minimum benefit is not to exceed 20% of the average “415 Compensation” under a Straight Life Annuity.

For purposes of providing the minimum benefit under Code Section 416, a non-Key Employee who is not a Participant solely because (1) his Compensation is below a stated amount or (2) he declined to make mandatory contributions to the Plan will be considered to be a Participant. Furthermore, such minimum benefit shall be provided regardless of whether such non-Key Employee is employed on a specified date.

In determining years of Credited Service with the Employer for Top-Heavy determination purposes, any service with the Employer shall be disregarded to the extent such service occurs during a Plan Year when the Plan benefits (within the meaning of Code Section 410(b)) no Key Employee or Former Key Employee. If payment of the minimum benefit commences at a date other than the Normal Retirement Date, the minimum benefit shall be the Actuarial Equivalent of the minimum benefit commencing at the Normal Retirement Date, pursuant to Section 1.2.

If a non-Key Employee participates in this Plan and a defined contribution plan included in a Required Aggregation Group which is Top-Heavy, the minimum benefit shall be provided under this Plan.

ARTICLE XIV

WITHDRAWAL LIABILITY

Section 14.1 Withdrawal Liability. An Employer shall pay withdrawal liability in accordance with ERISA and rules adopted by the Trustees.

Any Contributing Employer who totally or partially withdraws from this Plan is required to continue funding his proportional share of the Plan's unfunded vested benefits by making stipulated annual withdrawal liability payments to the Plan. However, withdrawal liability under this Section 14.1 is subject to adjustments and dollar limitations in the event of (i) Employer insolvency; (ii) liquidation or dissolution of individual Employers; (iii) asset sales to unrelated parties; and/or (iv) pursuant to the de minimis rule. Further, the Employer is required to make level annual payments to the Plan for the lesser of (i) the number of years it would take to amortize its withdrawal liability or (ii) twenty (20) years. But if all, or substantially all, the Employers withdraw, the annual amount payable shall be computed without regard to the twenty (20) year limit and the total unfunded vested benefits of the Plan shall be allocated to all Employers under PBGC regulations.

As soon as practicable after an Employer's complete or partial withdrawal, the Trustees must notify the Employer of (i) the amount of withdrawal liability and (ii) a payment schedule for paying off the liability. In addition, the Trustees shall make written demand to the Employer for withdrawal payments in accordance with the payment schedule. Payment of withdrawal liability must begin no later than sixty (60) days after the date on which the Trustees demand payment. Payments are to be made in four (4) equal quarterly installments. If a payment is not made when due, interest will accrue on the unpaid amount based on the actuarial valuation interest rate. Further, no penalty will apply if the Employer pre-pays all or part of the outstanding amount of the unpaid withdrawal liability obligation plus accrued interest, if any. The amount determined to be the Employer's withdrawal liability for a complete or partial withdrawal is to be adjusted in the following order to reflect the reductions and limitations permitted under the withdrawal rules: (i) any reduction under the de minimis rules; (ii) any pro rata reduction in the case of a partial withdrawal; (iii) the limitation on annual payments under the twenty (20) year payment ceiling; and (iv) the dollar limitations on withdrawal liability.

Section 14.2 Method of Determining Withdrawal Liability. In the event that a Contributing Employer withdraws under this Plan, its share of unfunded vested benefits liability, to the extent not otherwise reduced or eliminated under the Multiemployer Pension Plan Amendments Act of 1980 ("MPPAA"), shall be calculated under the "presumptive" method, pursuant to Section 4211(b) of ERISA.

Section 14.3 Adjustments to Withdrawal Liability for Plans in Critical Status. For any plan years in which the Plan is in Critical Status, in accordance with Code Section 432(b)(2), in determining an Employer's proportional share, if any, of the unamortized amount of a change in unfunded vested benefits referred to in Section 4211(b)(2)(E) of ERISA,

- (i) contribution surcharges made pursuant to Section 305 of ERISA shall be disregarded in determining an employer's withdrawal liability, and
- (ii) if any reductions are made to "adjustable benefits" under provisions of a Rehabilitation Plan adopted by the Board of Trustees, as permitted under Section 432 of the Code, an Employer's proportional share of the unamortized balance of the Plan's "affected benefits" shall be included, as described in PBGC Technical Update 10-3.

ARTICLE XV

ADDITIONAL REQUIREMENTS FOR MULTIEMPLOYER PLANS IN ENDANGERED STATUS OR CRITICAL STATUS

Section 15.1 Compliance. Notwithstanding anything in the Plan to the contrary, effective for Plan Years beginning on or after January 1, 2008, if the Actuary certifies that the Plan is in "Endangered Status" or "Critical Status," the Board of Trustees will adopt and implement a "Funding Improvement Plan" or "Rehabilitation Plan," as applicable, and comply with the requirements under Code Section 432 and the Treasury regulations thereunder. Such "Funding Improvement Plan" or "Rehabilitation Plan" shall include, but is not limited to, the actions to improve the Plan's funded percentage to enable the Plan to emerge from "Endangered Status" or "Critical Status," as applicable, including schedules with the revised benefit structures, revised contribution structures, or both, as prescribed under Code Section 432. No later than the 90th day of each Plan Year, the Actuary will certify whether the Plan is in "Endangered Status" or "Critical Status" for such Plan Year. In accordance with Code Section 432, the Board of Trustees shall annually update the applicable "Funding Improvement Plan" or "Rehabilitation Plan," including related schedules, to reflect the experience of the Plan. The Board of Trustees has the sole discretion to amend and interpret the "Funding Improvement Plan" or "Rehabilitation Plan," including any related schedules.

Section 15.2 Benefit Reductions and Restrictions. The Board of Trustees shall comply with the implementation and rules for operation regarding amendments that increase the Plan's liabilities and place restrictions on benefits and benefit increases, as described in Code Section 432, during the period beginning on the date the Actuary certifies that the Plan is in "Endangered Status" or "Critical Status," as applicable, and continuing through the end of the "Funding Improvement Period" or "Rehabilitation Period."

Section 15.3 Automatic Employer Surcharge. In accordance with Code Section 432(e), while a Plan is certified by the Actuary to be in "Critical Status," each Covered Employer obligated to make Plan contributions will be required to pay a surcharge, equal to a percentage of the contributions otherwise required, starting in the initial critical year no later than 30 days after receiving notification of "Critical Status," and for each succeeding Plan Year. The surcharge will cease to apply to any Employer once its Collective Bargaining Agreement is amended to comply with the Funding Improvement Plan or Rehabilitation Plan.

Section 15.4 Notification. In accordance with the annual certification by the Actuary, pursuant to Code Section 432(b)(3), proper notification of the "Endangered Status" or "Critical Status" for a Plan Year will be provided to the Participants and Beneficiaries, the Board of Trustees, labor organizations representing Participants, the Pension Benefit Guaranty Corporation and the Secretary of Labor no later than 30 days after such actuarial certification. The Board of Trustees will also provide notification to the Participants, Beneficiaries, Covered Employers, and the labor organizations representing Participants no later than 30 days prior to the effective date of the reduction of any adjustable benefits, as defined in Code Section 432(e)(8) and referenced in Section 10.1 of the Plan.

Section 15.5 Definitions. For purposes of this Article XV, the terms “Endangered Status,” “Critical Status,” “Rehabilitation Plan,” “Funding Improvement Plan,” “Rehabilitation Period,” and “Funding Improvement Period,” shall have the meanings ascribed to them in Code Section 432.

IN WITNESS WHEREOF, the Board of Trustees has caused the amendment and restatement of the Bindery Industry Employers GCC/IBT Pension Plan to be executed this 15 day of January, 2015.

FOR THE UNION



Trustee

Trustee

FOR THE EMPLOYERS



Trustee



Trustee

**AGREEMENT AND DECLARATION OF TRUST
OF THE BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND**

WHEREAS, the Bookbinders Multiemployer Group (“BMEG”), a division of Graphic Arts Association (“Association”) and Graphic Communications International Union Local 2-B (“Local 2-B”) had previously executed a Collective Bargaining Agreement which, among other things, provided for payment of money into a jointly administered trust fund by Employers represented by BMEG to provide pension benefits for certain employees in collective bargaining units represented by Local 2-B;

WHEREAS, BMEG and the Association no longer represent Employers in collective bargaining with Local 2-B; and

WHEREAS, Local 2-B is no longer in existence and certain of its members are now represented by Graphic Communications Conference of the International Brotherhood of Teamsters, Local 4-C (*formerly Graphic Communications International Union Local 4-C*) and Graphic Communications Conference of the International Brotherhood of Teamsters, Local 14-M (*formerly Graphic Communications International Union Local 14-M*) (both Locals hereinafter referred to as the “Union”); and

WHEREAS, effective May 1, 1999, the Plan was amended to eliminate the Association as a party to the Plan and provide for the continued administration of the Plan by an equal number of members of the Board of Trustees appointed by the Contributing Employers and the Union; and

WHEREAS, the pension plan previously known as Bookbinders Multiemployer Group-Graphic Communications International Union Local 2-B Pension Plan, originally established on January 1, 1962, changed its name to Bindery Industry Employers/GCIU Pension Plan and then

subsequently to Bindery Industry Employers GCC/IBT Pension Plan ("Plan") effective January 1, 2006; and

WHEREAS, this Agreement and Declaration of Trust, made on this 26th day of May, 2011, by and between GRAPHIC COMMUNICATIONS CONFERENCE OF THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL 4-C and GRAPHIC COMMUNICATIONS CONFERENCE OF THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS, LOCAL 14-M hereinafter referred to as the "Union", and the undersigned employers, acting on behalf of employers who are or may become parties to a collective bargaining agreement with the Union or otherwise obligated to contribute to this Fund and hereinafter referred to as the "Employer";

WHEREAS, the parties established a Pension Fund and herein desire to provide for its administration;

NOW, THEREFORE, IT IS MUTUALLY AGREED AS FOLLOWS:

ARTICLE I DEFINITIONS

1. "Fund" shall mean the Bindery Industry Employers GCC/IBT Pension Fund. Fund shall further mean the payments to or for the Pension Fund provided for in the collective bargaining agreement between the Employer and the Union now or hereinafter in effect, and shall further mean and include the corpus and earnings, appreciations or additions thereon and thereto held by the

Trustees for the uses, purposes and trusts set forth in the Trust Agreement and in the Plan and in any future amendments which may be made to the Trust Agreement and/or the Plan.

2. "Employer" shall mean those employers who are parties to collective bargaining agreements or supplements thereto entered into with the Union requiring payments to the Fund. Employer shall also mean those employers who are parties to a collective bargaining agreement, or a supplement or memorandum, obligating such employers to make payments to the Fund and providing for the adoption by said employer of this Agreement and Declaration of Trust.

3. "Union" shall mean GRAPHIC COMMUNICATIONS CONFERENCE OF THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL 4-C and GRAPHIC COMMUNICATIONS CONFERENCE OF THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS, LOCAL 14-M.

4. "Employee" shall include any employee employed by the Employer for whom the Employer is required to submit payments to the Fund pursuant to its collective bargaining agreement with the Union or this Agreement and Declaration of Trust.

5. "Board of Trustees" or "Board" or "Trustees" shall mean those persons designated by the Employer and the Union as their representatives and as set forth in Appendix "A" hereof, as well as any successors who become signatory to Appendix "A", who shall be in charge of the administration of the Fund.

6. "Trust Agreement" shall mean this Agreement and Declaration of Trust, as it may be amended from time to time.

7. "Contributions" or "Payments" shall mean the money paid into the Fund by the Employer.

8. "Plan" shall mean the Plan program, method and procedures which set forth and pertain to the payment of benefits in the amount and circumstances provided for by the Bindery Industry Employers GCC/IBT Pension Fund.

9. "Act" shall mean the Employee Retirement Income Security Act of 1974, as amended.

ARTICLE II NAME AND PURPOSE

1. There is established a Trust Fund to be known as the Bindery Industry Employers GCC/IBT Pension Fund.

2. The purpose of the Fund shall be to provide benefits for eligible participants and dependents in the Plan, as such eligibility requirements are presently or hereafter established by the Trustees.

ARTICLE III NUMBER OF TRUSTEES, DESIGNATION; REMOVAL; SUCCESSOR TRUSTEES; MEETINGS OF TRUSTEES

1. The Fund shall be administered and operated by a Board of Trustees consisting of four (4) Trustees, two (2) of whom shall be designated by the Union and two (2) of whom shall be designated by the Employer. More specifically, one (1) Trustee shall be designated by the GRAPHIC COMMUNICATIONS CONFERENCE OF THE INTERNATIONAL

BROTHERHOOD OF TEAMSTERS LOCAL 4-C; one (1) Trustee shall be designated by the GRAPHIC COMMUNICATIONS CONFERENCE OF THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS, LOCAL 14-M and two (2) Trustees shall be designated by employers party to collective bargaining agreements with the Union. There shall be at all times an equal number of Trustees designated by the Union and by the Employer.

2. If a Trustee chooses to resign, he must give written notice to the remaining Trustees of his desire to resign as Trustee. Such notice shall set forth the date on which the Trustee wishes his resignation to become effective; however, the effective date of the resignation shall not be less than thirty (30) days from the date on which the notice of resignation is sent to the Board of Trustees, unless the remaining Trustees agree to allow the effective date of the resignation to be on a date less than thirty (30) days from the date on which the notice of resignation is tendered.

3. In case a Union Trustee shall die, become incapable of acting hereunder, resign or be removed, a successor Trustee shall be appointed immediately by the Union that made such appointment. In case an Employer Trustee shall die, become incapable of acting hereunder, resign or be removed, a successor Trustee shall be appointed immediately by the Employer that made such appointment.

4. As to the removal of a Trustee, whether it be an Employer Trustee or a Union Trustee, the party designating the Trustee sought to be removed shall be the only party to remove such Trustee; further, in any case of removal, there must be an instrument in writing, duly signed and authenticated by the proper officers of the party removing such Trustee, which instrument in writing shall set forth the fact that the Trustee designated by such party is to be removed and shall

designate the succeeding Trustee who is to take the place of the Trustee who is being removed thereby.

5. It is the intention of the parties that the Fund shall at all times be administered by an equal number of Employer Trustees and Union Trustees, and, therefore, when required, a successor Trustee or Trustees shall forthwith be designated in the manner described in this Article III.

6. Any successor Employer Trustee or any successor Union Trustee, shall, immediately upon his appointment and acceptance in writing, become vested with all the properties, rights, powers and duties of a Trustee hereunder and notice of said appointment shall be given to the other Trustees, to any bank or banks used as a depository for the Fund, as well as any other institution holding or managing any of the property and assets of the Fund.

7. The Board shall appoint one (1) Chairman of the Board and one (1) Member Secretary of the Board, but at all times one of those officers shall be an Employer-Appointed Member and the other officer shall be a Union-Appointed Member. The Board may appoint such other officers as it deems necessary for the proper administration of the Plan. The officers of the Board shall call meetings of the Board of Trustees at any time by giving at least seven (7) days written notice of the date, time and place thereof to the other Trustees, unless such written notice is waived by the other Trustees. If the circumstances require, action may be taken by the Trustees without a meeting; provided, however, that in each case there shall be unanimous written concurrence of all Trustees then in office.

8. There shall be a meeting of the Board of Trustees at least every six (6) months.

9. A quorum of the Board of Trustees shall consist of the actual or telephonic presence of at least three (3) Trustees. When there are an equal number of Employer Trustees and Union Trustees present at a meeting, each Trustee shall have one vote. If there are an unequal number present at the meeting, the Trustees present for either the Employer or the Union shall have the full vote of all the Employer Trustees or the Union Trustees, as the case may be, so that at all times each group of Trustees, either the Employer Trustees or the Union Trustees, shall have an equal number of votes. When a quorum is present at any meeting, a majority of the Trustees voting shall decide any questions and matters brought before such meeting, and the act of the Trustees voting, so long as a quorum is present, shall be valid and binding as the action of the Board of Trustees.

10. If the Trustees are unable to agree upon or settle any of the matters as such matters arise during the administration of said Fund, then the Trustees shall promptly agree upon an impartial arbitrator to decide the matters in dispute, and if the Trustees, within thirty (30) days after the matter in dispute has arisen, are unable to agree upon the selection of an impartial arbitrator, then any one Trustee may refer the matter to the American Arbitration Association for the appointment of an impartial arbitrator promptly to hear and render a final decision upon the matter or matters in dispute. The arbitrator's fee shall be paid out of the Fund.

11. The Trustees designated hereunder shall be fiduciaries who jointly have authority to control and manage the operation and administration of the Fund.

ARTICLE IV
POWERS AND DUTIES OF THE TRUSTEES

1. The powers and duties of the Trustees shall be as follows:
 - (a) to establish the Plan by which the Trust Fund is to be operated and administered; to establish the policies and rules pursuant to which the Fund and Plan are to be administered and operated;
 - (b) to determine the nature, amount, duration and eligibility for participation under this Fund;
 - (c) to provide a procedure and to establish and carry out a funding policy and method consistent with the objectives of the Fund and applicable law and to make all necessary arrangements for the funding of the Program for the provisions of which this Fund has been established;
 - (d) to allocate the responsibility for the administration and operation of the Fund among the Trustees or to other fiduciaries pursuant to resolution duly adopted by a majority of the Trustees which resolution shall specifically delineate which responsibilities and to whom they are allocated;
 - (e) to receive and collect all contributions for payments due and payable to the Fund, and to determine the basis upon which

payments are made from the Plan. In so doing, the Trustees, in their sole discretion, shall have the right to maintain any and all actions and legal proceedings necessary for the collection of contributions or payments herein provided for and required; the Trustees shall have the right to prosecute, defend, compound, compromise, settle, abandon or adjust, by arbitration or otherwise, any action, suits, proceedings, disputes, claims, details and things relating to the Fund.

In the event that the Trustees shall deem it necessary to institute proceedings, legal or otherwise, to effectuate collection of contributions which are due and owing, they shall also be entitled to recover from the delinquent Employer those reasonable attorney's fees and costs which are incurred by the Fund as the result of such proceeding;

(f) to verify, by audit or other means, the accuracy of statements and information submitted by the Employer and Union on contribution forms, claim forms and other forms. In furtherance of this right and duty, the Trustees may require the Employer and Union to furnish to the Trustees such information and reports as they, the Trustees, may require in the performance of their work as Trustees, and the Employer and Union shall furnish such information and reports when requested to do so by the Trustees;

(g) to hold, invest and reinvest and administer the principal and income of the Fund and to keep the same invested without distinction between principal and income, provided, however, that investments and reinvestments may be made only in accordance with the applicable law, if any, relating thereto. If it be deemed advisable by the Trustees, they may retain an investment agent or advisor as defined in Section 3(38) of the Act, whether it be a bank or trust company, or a corporation or individual, to counsel and advise the Trustees in all matters relating to investments and reinvestments. After such appointment, the Trustees may convey and transfer to the investment manager such part of the Fund as may, in the sole discretion of the Trustees, be proper and advisable; provided, however, that the assets of the Fund may be invested or reinvested without distinction between principal and income being limited to the class of investments which are defined as legal investments for fiduciaries under the laws of the Commonwealth of Pennsylvania; an investment manager may invest Plan assets in deposits of a bank or similar financial institution supervised by the United States or a State, even if such bank or institution is a Fund fiduciary provided such deposits bear a reasonable interest rate and are otherwise prudent. The Trustees shall have the right to reserve and to keep

unproductive such amount of the Fund as they may determine to be advisable, without liability for interest on such amounts;

(h) to purchase, if the Trustees so decide, insurance and to pay the premiums thereof and to exercise all of the rights, provisions and options in any insurance contract; and to provide, in the discretion of the Trustees, for self-insurance in the providing of benefits to employees;

(i) to buy, sell, exchange, convey, transfer or dispose of, and also create options with respect to any property, whether real or personal, at any time held by the Fund. Any sale may be made by contract or by auction, and no person who is dealing with the Trustees shall be required to see the application of the money or to inquire into the validity, expediency or propriety of any such sale or other disposal. Also, to retain, manage, operate, repair, improve and mortgage for any period any real estate held by the Fund. Also, to make, effectuate and deliver any and all deeds, assignments, documents of transfer, and any other instruments that may be necessary or appropriate to carry out the powers herein granted;

(j) to hold or register any asset of the Fund in their names as Trustees, or the names of their nominee or the nominee of their custodian in bearer form without disclosing fiduciary relationship;

provided, however, that the books and records of the Trustees shall at all times show that all such assets are part of and belong to the Fund; to vote in person or by proxy, or otherwise, on any securities held by the Trustees, and to exercise by power of attorney, or in any other manner, any of the rights of whatsoever nature pertaining to securities or any other property held by the Trustees at any time to consent to the recapitalization, consolidation, sale, merger, dissolution or readjustment of any corporation, company or association which has issued the securities held by and belonging to the Fund to exercise any option or options, make any agreement or subscription, pay any expense in connection with the securities and to hold and retain any property acquired by means of the exercising of the powers hereinbefore expressed to the extent that the Trustees in their discretion deem acceptable;

(k) to pay and provide for the payment of all reasonable and necessary expenses of collecting Employer contributions or payments; to pay and provide for the payment of all reasonable and necessary expenses which may be incurred in connection with the establishment and operation of the Fund, such as expenses for the employment of administrative; legal; expert and clerical assistance, the purchase or lease of premises to be used and occupied by the

Fund, the purchase or the lease of such materials, supplies and equipment as the Trustees, in their discretion, find necessary to be appropriate in the exercising of their rights and duties as Trustees;

(l) to deposit all funds received by the Fund in such bank or banks as the Trustees may designate for that purpose; provided, however, that the depository bank or banks shall be insured by the Federal Deposit Insurance Corporation. The withdrawal of funds from the designated depository bank or banks shall be made only by authorization of the Trustees.

(m) to keep true and accurate books of accounting and records of all of the transactions of the Fund and Plan and all such books or accounts and records of the Fund shall be audited annually. The audit of all books of accounts and records of Fund shall be made available to the members and placed in the office where the business of the Fund is transacted, where it shall be made available for inspection by all persons who are entitled to make such inspection under applicable law or upon demand by the Union or an Employer if the parties so demand and agree to pay the costs incurred thereby;

(n) to report and disclose such financial statements or other reports as they, the Trustees, may deem proper in accordance with

applicable law, and to determine at what time such statements shall be issued and the method of distribution;

(o) to delegate any of the ministerial powers and duties of the Trustees to any administrator, agent, or employee engaged by them or to any one or more of the Trustees themselves. Such delegation shall be made pursuant to resolution duly adopted by a majority of the Trustees which resolution shall specifically delineate which powers and duties and to whom they are delegated;

(p) to make, adopt, amend or repeal by-laws, rules and regulations not inconsistent with the terms of this Agreement and Declaration of Trust as the Trustees may deem necessary or desirable for the conduct of their business; to amend the Fund provided that the amendments comply with the purpose thereof, and further provided that any amendments to the Fund shall be signed by the Trustees as part of the records and meetings of the Trustees;

(q) to enter into reciprocal agreements, if the Trustees deem it advisable, with the Trustees of other Funds and Plans established in the industry;

(r) to select and/or retain an administrator(s) who shall receive contributions, keep records or contributions received, keep records of hours worked, and do and perform all other duties designated by

the Board of Trustees for an orderly administration of the Fund and Plan;

(s) to construe the terms and provisions of this Agreement and Declaration of Trust, the Plan, the eligibility rules established by the Trustees, and all other supplementary and amendatory documents including the discretionary power and authority to construe all of the terms of the Plan or other Plan documents, including terms that may be uncertain, and make all determinations in connection with the eligibility for participation. Any such construction made in good faith shall be binding upon the Employer, the Union, the employees, any beneficiaries, and all other persons who may be involved or affected;

(t) to submit such reports and forms as may be required by applicable federal and state law to the United States Treasury Department, or any other government agency, and to make whatever changes are, or may at any time be or become, necessary in order to continue the operation of the Fund and Plan in accordance with the principles established by applicable law.

(u) to perform and do any and all such actions and things which the trustees may deem to be properly incidental to the exercising of the powers, rights, duties and responsibilities of the Trustees;

(v) to submit the Fund and Plan for qualification and exemption to the Internal Revenue Service so that the Fund and Plan may be ruled qualified and exempt under the provisions of the Internal Revenue Code, as such provisions presently exist, or as they may be amended; and in order to secure and retain such qualifications and exemptions of the Fund and Plan, the Trustees are empowered to make whatever changes are necessary or may become necessary in the Fund or Plan in order to obtain and retain such qualified exemption;

(w) to decide whether or not to accept for participation in the Fund and Plan classes of employees of an Employer who are not represented for the purpose of collective bargaining by the Union, provided, however, that the Employer does employ employees who are represented for the purpose of collective bargaining by the Union for which employees the Employer makes contributions to the Fund; further, if the Trustees accept for participation in the Fund and Plan employees who are employed by an Employer and who are not represented for the purpose of collective bargaining by the Union, then the Trustees shall establish the terms and conditions of such acceptance for participation in the Fund and Plan, and such terms

and conditions shall be set as to preserve the actuarial soundness of the Plan;

(x) The Trustees are authorized and empowered to purchase errors and omissions insurance and other necessary bonding and coverage for the Trustees and for all other fiduciaries or persons who handle money and/or property of the Fund. The purpose of errors and omissions insurance shall be to compensate the Fund for losses due to any breach of fiduciary responsibility and shall protect each Trustee and other fiduciary from losses resulting from such a breach. The Trustees may also purchase insurance for themselves collectively and/or individually, or for any other fiduciary employed by the Trustees to cover liability or losses occurring by reason of the act or omission of a fiduciary. To the extent that such premiums are not permitted by applicable law to be paid for by the Fund, they shall be paid for by the Union and the Employer.

(y) The Trustees may by unanimous consent enter into agreements with the Trustees of other pension funds qualified under Section 401(a) of the Code, or with Employers in the Commercial Printing Industry, who have qualified plans in force, for a more effective operation of the Plan.

(z) The Trustees may cause this Plan to merge with one or more multiemployer plans or engage in the transfer of assets and liabilities to or from another multiemployer plan, provided that such merger or transfer satisfies the following requirements:

(1) The Pension Benefit Guaranty Corporation (“PBGC”) is notified of the merger or transfer at least 120 days before its effective date;

(2) No Participant’s or Beneficiary’s Accrued Monthly Pension will be lower immediately after effective date of the merger or transfer than the benefit immediately before that date;

(3) The benefits of Participants and Beneficiaries are not reasonably expected to be subject to suspension under Section 4245 of ERISA; and

(4) An actuarial valuation of the assets and liabilities of each of the affected plans has been performed during the Plan Year preceding the effective date of the merger or transfer, based on the most recent data available as of the day before the start of that Plan Year, or other valuation of such assets and liabilities has been performed under such standards and procedures as the PBGC may prescribe by Regulation.

ARTICLE V
LIABILITY OF THE TRUSTEES, INDEMNIFICATION

1. The Trustees shall be protected and held harmless to the extent permitted by applicable law, including, but not limited to, the Act, if they act in good faith in the performance of their duties in the administration and operation of the Fund. So long as the Trustees commit no act of willful misconduct, bad faith or gross negligence, they shall not, to the extent permitted by applicable law, be held personally answerable or personally liable for either (a) any liability or debts contracted by them or for the nonfulfillment of a contract, or (b) for any error of judgment or for any loss arising out of any act or omission in the execution of the Fund, or (c) for the actions or omissions, whether or not performed at the request of the Fund, or of any employee, agent or attorney elected or appointed by or working for the Trustees.

2. The Fund, through its Trustees who shall exercise their sole discretion in the matter, shall have the power and authority to indemnify and reimburse, in whole or in part, amounts necessarily and reasonably paid or incurred representing expenses (including attorney's fees), judgments and amounts paid in settlement, by any person who was or is a party or is threatened to be made a party to any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative or investigative, by reason or the fact that he is or was a Trustee and/or is or was an employee of the Fund, provided that the Trustees shall first find that such person acted in good faith and in a matter he reasonably believed to be in, or not opposed to, the best interests of

the Fund and with respect to any criminal action or proceeding involving criminal intent, if such action or proceeding did not result in his conviction.

3. The Trustees shall not be liable for the improper application of any part or the Fund or Plan or for any other liability arising in connection with the administration or operation of the Fund except as herein provided for, and except as required by applicable law, including, but not limited to the Act.

4. The Trustees may, from time to time, consult with legal counsel for the Fund and shall be fully protected in acting and relying upon the advice of such legal counsel to the extent permitted by applicable law.

5. The Trustees may seek protection by any act or proceeding that they may deem necessary in order to settle their accounts; the Trustees may obtain a judicial determination or declaratory judgment as to any question or construction of the Agreement and Declaration of Trust, or as to any act thereunder.

6. The Trustees shall receive no compensation for their services as Trustees, but shall be reimbursed for all reasonable and necessary expenses incurred in the performance of their duties, to the extent allowed by law. Trustees who are not full-time officers and employees of the Union or of the Employer shall be compensated for any lost wages incurred in the performance of their duties, to the extent determined by the Trustees and allowed by law.

7. No employee or any person claiming by and through any employee shall have any right, title or interest in or to the Fund or any part thereof. Neither shall the Employer nor the Union, nor any other person, partnership, corporation or association, or any person claiming by or

through any of the aforementioned parties or persons have any right, title or interest in or to the Fund or any part thereof. Title to all of the money, property and income paid into or accrued by the Fund shall be vested in and remain exclusively in the Board of Trustees of the Fund, and it is the intention of the parties hereto that said Fund shall constitute an irrevocable trust, and that no benefits or monies payable from the Fund shall be subject in any manner to anticipation, alienation, sale, transfer, assignment, pledge, encumber or charge and the same shall be void. The monies paid or due to be paid into the Fund shall not constitute or be deemed to be monies due to individual employees, nor shall said monies in any manner be liable for or subject to the debts, contracts, liabilities, or torts of any of the parties or persons entitled to such monies upon the termination of the Fund.

8. Neither the Employer nor any officer, agent, employee or committee members of the Employer shall be liable to make payments to the Fund or be under any other liability to the Fund or with respect to the Plan, except to the extent that he or it may be required to make payments to the Fund. The individual Employers shall not be required to make any further payments or contributions to the cost of operation of the Fund, except as may be hereinafter provided in the collective bargaining agreement, the Agreement and Declaration of Trust, or applicable law.

**ARTICLE VI
CONTRIBUTIONS OR PAYMENTS TO THE
FUND; DEFAULT BY EMPLOYER**

1. The contributions or payments of the Employer shall be made in the amount set forth in the collective bargaining agreement and any amendment or amendments thereto which may

hereafter be executed. The contributions or payments of the Employer shall be made in accordance with this Agreement and any rules and regulations promulgated by the Trustees in connection therewith; the Employer shall be notified as to all matters pertaining to the payments of the contributions or payments due, including such matters as the date on which the contributions or payments are due; the person or place to which the contributions or payments are to be sent and all matters pertaining to the contributions or payments and any forms or reports required in connection therewith.

2. The Trustees may compel and enforce the payment of the contributions in any manner which they may deem proper; however, the Trustees shall not be required to compel and enforce the payments of the contributions or payments or else to be personally or collectively responsible therefor, if in the opinion of the Trustees, the enforcement of the payments or contributions would involve an expense greater to the Fund than the amount to be collected from any effort to compel or enforce the payment of the contributions or payments.

3. An Employer shall not have the duty or obligation to collect, receive or pay over any of the contributions or payments required to be made and to be paid by another Employer, nor shall an Employer or the Union be deemed guarantors or sureties in respect to any such contribution or payments due from another Employer.

4. The failure of the Employer to make the payments required hereunder at the time due shall be a violation of the collective bargaining agreement and amendment thereto between such Employer and the Union, as well as a violation of the Employer's obligation hereunder. Non-payment by any Employer within the definition of "Employer" of any contributions or payments

when due shall not relieve any other Employer from the obligation to make contributions or payments. The defaulting Employer shall be obligated to pay all expenses of collection that may be incurred by the Trustees in collecting the contributions or payments due; in addition, the defaulting Employer shall be obligated to pay the delinquency charges contained and described in the collective bargaining agreement and any amendment or amendments thereto, as well as interest on the delinquent contributions or payments and liquidated damages in an amount not in excess of twenty (20%) percent (or such higher percentage as may be permitted under federal or state law) of the contributions or payments owed in accordance with 29 U.S.C. § 1132(g)(2), as well as any auditing costs.

5. The obligation to make the contributions or payments as well as all other obligations of the Employer shall be binding upon the successors and assigns of each corporate Employer, and upon the heirs, executors, administrators and assigns of each unincorporated Employer.

6. In the event that the Fund is not qualified by the Internal Revenue Service, all contributions shall be returned to the Employer.

ARTICLE VII AMENDMENT OR TERMINATION

1. The provisions of this Agreement and Declaration of Trust may be amended by an instrument in writing executed by and between the Trustees, provided, however, that no amendment shall divert the assets of the Fund from the purpose specified herein or shall contravene applicable law.

2. The Fund and Plan shall continue in full force and effect as long as the Union is the collective bargaining representative of the employees of any Employer, or until the Union and the Employer agree to terminate it, provided that any such termination shall be in accordance with applicable federal law.

3. If this Fund and Plan are terminated, the funds then held by the Trustees shall be applied so as to (a) pay any and all outstanding debts and obligations to the Fund, and (b) then to apply any remaining surplus in a manner best able to effectuate the purposes set forth herein; and (c) to accord with the provisions of applicable federal law; and then upon disbursement of all of the funds of the Fund, and only upon the compliance with all provisions of applicable federal law, this Agreement and Declaration of Trust, as well as the Fund and the Plan may be considered terminated.

ARTICLE VIII CONSTRUCTION

1. This Agreement and Declaration of Trust may be executed in one or more counterparts. The signature of a party on any counterpart shall be sufficient evidence of his execution hereof.

2. The provisions of this Agreement and Declaration of Trust, and of the Plan, shall be liberally construed in order to promote and effectuate the establishment and operation of the Fund and Plan and for the exclusive benefit of employees and dependents. The Trustees shall have power to interpret, apply and construe the provisions of this Agreement and Declaration of Trust, and any construction, interpretation and application adopted by the Trustees in good faith, shall be

binding upon the members, as well as the beneficiaries and all other persons who may be involved or affected thereby.

3. In the event that any provision of this Agreement and Declaration of Trust and/or of the Plan shall be held illegal or invalid for any reason, said illegality or invalidity shall not affect the remaining provisions of this Agreement and Declaration of Trust and/or the Plan; the provision or provisions held illegal or invalid shall be fully severable and the Agreement and Declaration of Trust and/or Plan shall be construed and enforced as if said illegal or invalid provisions had never been inserted herein.

4. This Fund is accepted by the Trustees in the Commonwealth of Pennsylvania, and all questions pertaining to its validity, construction and administration shall be determined in accordance with the laws of the Commonwealth of Pennsylvania.

5. Wherever any words are used in this Agreement and Declaration of Trust and in the Plan in the masculine gender, they shall be construed as though they were also used in the feminine gender in all situations where they would so apply, and wherever any words are used in this Agreement and Declaration of Trust in the singular form, they shall be construed as though they were also used in the plural form in all situations where they would so apply, and wherever any words are used in this Agreement and Declaration of Trust in the plural form, they shall be construed as though they were also used in the singular form in all situations where they would so apply.

IN WITNESS WHEREOF, the parties have hereunto caused this Agreement and Declaration of Trust to be duly executed and sealed the day and year first written above.

UNION:

Wayne H. Cox
GRAPHIC COMMUNICATIONS
CONFERENCE OF THE INTERNATIONAL
BROTHERHOOD OF TEAMSTERS
LOCAL 4-C

[Signature]
GRAPHIC COMMUNICATIONS
CONFERENCE OF THE INTERNATIONAL
BROTHERHOOD OF TEAMSTERS, LOCAL
14-M

Dated: 5/26/11

EMPLOYER:

John Walsh
NATIONAL PUBLISHING CO.

[Signature]
Jonathan Shapiro, SED

Michael LaVeenstein
Dated 6/22/2011 PPL

Michael George
Michael George, Consolidated Media

APPENDIX A

The Undersigned Trustees, by their execution of this Agreement and Declaration of Trust, do hereby accept the position of Trustee, and declare that they will receive and hold the BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND as Trustees, by virtue of this Agreement and Declaration of Trust for the uses, purposes and trusts herein set forth and with the powers and duties herein set forth and none others.

UNION TRUSTEES:



GRAPHIC COMMUNICATIONS
CONFERENCE OF THE INTERNATIONAL
BROTHERHOOD OF TEAMSTERS
LOCAL 4-C



GRAPHIC COMMUNICATIONS
CONFERENCE OF THE INTERNATIONAL
BROTHERHOOD OF TEAMSTERS, LOCAL
14-M

EMPLOYER TRUSTEES:





Dated: 5/26/11

**AMENDMENT NO. 2021-1
TO THE AGREEMENT AND DECLARATION OF TRUST
OF THE BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION FUND**

WHEREAS, National Publishing Company (LSC Communications) and Graphic Communications Conference of the International Brotherhood of Teamsters, Local 4-C had previously executed a collective bargaining agreement which, among other things, provided for payment of money into a jointly administered trust fund by employers represented by affiliates of the Graphic Communications Conference of the International Brotherhood of Teamsters to provide pension benefits for certain employees in specified collective bargaining units; and

WHEREAS, National Publishing Company no longer employs employees in collective bargaining with Local 4-C; and

WHEREAS, Local 4-C is no longer in existence and certain of its members are now represented by other affiliates of the Graphic Communications Conference of the International Brotherhood of Teamsters, District Council 9; and

WHEREAS, effective on this date, the Bindery Industry Employers GCC/IBT Pension Fund ("Pension Plan") amended its Agreement and Declaration of Trust to eliminate National Publishing Company and Local 4-C as party to the Plan and provide for a continuing administration of the Plan by an equal number of members through a Board of Trustees appointed by the contributing employers and the Graphic Communications Conference of the International Brotherhood of Teamsters, Local 14-M (hereinafter referred to as the "Union"); and

WHEREAS, this Agreement and Declaration of Trust, amended on this 28 day of September, 2021, by and between the Union and the undersigned

employers acting on behalf of employers who are or may become parties to a collective bargaining agreement with the Union or otherwise obligated to contribute to this Fund and hereinafter referred to as the "Employer"; and

WHEREAS, the parties established the Pension Plan and hereby desire to provide for its administration;

NOW, THEREFORE, it is mutually agreed to amend the Agreement and Declaration of Trust of said Pension Plan as follows:

1. Article I, Section 3 shall read as follows:

"Union" shall mean Graphic Communications Conference of the International Brotherhood of Teamsters, Local 14-M.

2. Article III, Section 1 shall read as follows:

The Fund shall be administered and operated by a Board of Trustees consisting of two (2) Trustees, one (1) of whom shall be designated by the Union and one (1) of whom shall be designated by the Employer. More specifically, one (1) Trustee shall be designated by the Graphic Communications Conference of the International Brotherhood of Teamsters, Local 14-M and one (1) Trustee shall be designated by the Employers party to an applicable collective bargaining agreement with the Union. There shall be at all times an equal number of Trustees designated by the Union and by the Employer.

3. Article 111, Section 9 shall be amended to read as follows:

A quorum of the Board of Trustees shall consist of the actual or telephonic presence of at least two (2) Trustees. When there are an equal number of Employer Trustees and Union Trustees present at the meeting, each Trustee shall have one vote. If there are an unequal number present at the meeting, the Trustees present for either the Employer or the Union shall have the full vote of all

of the Employer Trustees or the Union Trustees, as the case may be, so that at all times each group of Trustees, either the Employer Trustees or the Union Trustees, shall have an equal number of votes. When a quorum is present at any meeting, a majority of the Trustees voting shall decide any questions and matters brought before such meeting and the act of the Trustees voting, so long as a quorum is present, shall be valid and binding as the action of the Board of Trustees.

IN WITNESS WHEREOF, the parties have hereto caused this Amendment No. 2021-1 to the Agreement and Declaration of Trust to be duly executed and sealed the day and year first written above.

FOR THE UNION:

GRAPHIC COMMUNICATIONS CONFERENCE
OF THE INTERNATIONAL BROTHERHOOD
OF TEAMSTERS, LOCAL 14-M



FOR THE EMPLOYER:

SMITH-EDWARDS-DUNLAP COMPANY



**PROPOSED AMENDMENT 2023-2
TO THE
BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
TO REINSTATE SUSPENDED BENEFITS**

Background

1. The Board of Trustees of the Bindery Industry Employers GCC/IBT Pension Plan (the “Board”) has applied to the Pension Benefit Guaranty Corporation (“PBGC”) under section 4262 of the Employment Retirement Income Security Act of 1974, as amended (“ERISA”), and 29 C.F.R. § 4262 for special financial assistance for the Bindery Industry Employers GCC/IBT Pension Plan (the “Plan”).
2. 29 C.F.R. §§ 4262.6(e)(2) and 4262.15(a) require that the plan sponsor of a plan that is applying for special financial assistance and that suspended benefits under section 305(e)(9) or 4245(a) of ERISA amend the written instrument governing the plan to reinstate such suspended benefits and provide make-up payments in accordance with guidance issued by the Secretary of the Treasury under section 432(k) of the Internal Revenue Code (which was issued in IRS Notice No. 2021-38).
3. 29 C.F.R. § 4262.7(e)(2) requires that an application for special financial assistance for a plan that suspended benefits under section 305(e)(9) or 4245(a) of ERISA include a copy of the proposed plan amendment required under section 4262.6(e)(2) of ERISA and certification by the plan sponsor that the plan amendment will be timely adopted. Section 4262.7(e)(2) further requires (1) that such certification be signed either by all members of the plan’s board of trustees or by one or more trustees duly authorized both to sign the certification on behalf of the entire board and to commit the board to timely adopting the amendment after the plan’s application for special financial assistance is approved, and (2) that each signature be accompanied by the printed name and title of the signer.
4. Benefits under the Plan have been suspended under section 4245(a) of ERISA due to plan insolvency.
5. Under Section 10.1 of Article X of the Bindery Industry Employers GCC/IBT Pension Plan, Amended and Restated as of January 1, 2014 (the “Plan Document”), the Board has the power to amend the Plan Document.

Amendment

The Plan Document is amended by adding a Section 16.2 to Article XVI to read as follows:

Section 16.2 Reinstatement of Benefits

- “(a) Effective as of the first month in which special financial assistance is paid to the Plan, the Plan shall reinstate all benefits that were suspended under section 4245(a) of ERISA.

- (b) The Plan shall pay each participant and beneficiary that is in pay status as of the date special financial assistance is paid to the Plan the aggregate amount of their benefits that were not paid because of the suspension, with no actuarial adjustment or interest. Such payment shall be made in a lump sum no later than 3 months after the date the special financial assistance is paid to the Plan, irrespective of whether the participant or beneficiary dies after the date special financial assistance is paid.”

IN WITNESS THEREOF, the Trustees hereby execute this Amendment 2023-2 as of the ____ day of _____, 2023.

FOR THE UNION

FOR THE EMPLOYER

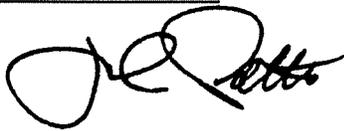
John Potts
Trustee

R. David Salter
Trustee

**CERTIFICATION THAT THE PLAN AMENDMENT
TO REINSTATE SUSPENDED BENEFITS WILL BE TIMELY ADOPTED**

As required by 29 C.F.R. § 4262.7(e)(2) for the application for special financial assistance for the Bindery Industry Employers GCC/IBT Pension Plan (the "Application" for the "Plan"), we, the members of the Board of Trustees of the Plan hereby certify that the proposed amendment to the Bindery Industry Employers GCC/IBT Pension Plan, Amended and Restated as of January 1, 2014 to reinstate benefits under the Plan that have been suspended under section 4245(a) of ERISA due to plan insolvency, which proposed amendment is submitted herewith as part of the Application, will be timely adopted upon approval by the Pension Benefit Guaranty Corporation of the Application.

FOR THE UNION



John Potts
Trustee

FOR THE EMPLOYER



R. David Salter
Trustee

Date: 2/28/2023

TEMPLATE 1

Form 5500 Projection

File name: *Template 1 Plan Name* , where "Plan Name" is an abbreviated version of the plan name.

v20220701p

For an additional submission due to merger under § 4262.4(f)(1)(ii): *Template 1 Plan Name Merged* , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

For the 2018 plan year until the most recent plan year for which the Form 5500 is required to be filed by the filing date of the initial application, provide the projection of expected benefit payments as required to be attached to the Form 5500 Schedule MB if the response to line 8b(1) of the Form 5500 Schedule MB should be "Yes."

PLAN INFORMATION

Abbreviated Plan Name:	Bindery Industry Employers GCC/IBT Pension Plan
EIN:	23-6209755
PN:	001

Complete for each Form 5500 that has been filed prior to the date the SFA application is submitted*.

	2018 Form 5500	2019 Form 5500	2020 Form 5500	2021 Form 5500	2022 Form 5500	2023 Form 5500	2024 Form 5500	2025 Form 5500
Plan Year Start Date	1/1/2018	1/1/2019	1/1/2020	1/1/2021				
Plan Year End Date	12/31/2018	12/31/2019	12/31/2020	12/31/2021				
Plan Year	Expected Benefit Payments							
2018	\$1,295,000	N/A						
2019	\$1,294,000	\$1,284,000	N/A	N/A	N/A	N/A	N/A	N/A
2020	\$1,291,000	\$1,287,000	\$1,267,000	N/A	N/A	N/A	N/A	N/A
2021	\$1,280,000	\$1,275,000	\$1,245,000	\$1,278,000	N/A	N/A	N/A	N/A
2022	\$1,272,000	\$1,270,000	\$1,228,000	\$1,248,000		N/A	N/A	N/A
2023	\$1,266,000	\$1,265,000	\$1,213,000	\$1,217,000			N/A	N/A
2024	\$1,248,000	\$1,245,000	\$1,186,000	\$1,188,000				N/A
2025	\$1,230,000	\$1,229,000	\$1,166,000	\$1,159,000				
2026	\$1,198,000	\$1,193,000	\$1,123,000	\$1,123,000				
2027	\$1,180,000	\$1,173,000	\$1,112,000	\$1,099,000				
2028	N/A	\$1,161,000	\$1,106,000	\$1,085,000				
2029	N/A	N/A	\$1,086,000	\$1,058,000				
2030	N/A	N/A	N/A	\$1,036,000				
2031	N/A	N/A	N/A	N/A				
2032	N/A	N/A	N/A	N/A	N/A			
2033	N/A	N/A	N/A	N/A	N/A	N/A		
2034	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

* Adjust column headers as may be needed due to any changes in the plan year since 2018 and provide supporting explanation. For example, assume the plan has a calendar year plan year, but effective 10/1/2019 the plan year is changed to begin on October 1. For 2019 there will be two 2019 Forms - one for the short plan year from 1/1/2019 to 9/30/2019, and another for the plan year 10/1/2019 to 9/30/2020. For this example, modify the table to show a separate column for each of the separate Forms 5500, and identify the plan year period for each filing.

TEMPLATE 3

Historical Plan Information

File name: *Template 3 Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

v20220701p

For additional submission due to merger under § 4262.4(f)(1)(ii): *Template 3 Plan Name Merged*, where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

Provide historical plan information for the 2010 plan year through the plan year immediately preceding the date the plan's initial application was filed that separately identifies: total contributions, total contribution base units (including identification of the base unit used (i.e., hourly, weekly)), average contribution rates, and number of active participants at the beginning of each plan year. Also show separately for each of the plan years in the same period all other sources of non-investment income, including, if applicable, withdrawal liability payments collected, reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if any), and other identifiable contribution streams.

If the sum of all contributions and withdrawal liabilities shown on this table does not equal the amount shown as contributions credited to the funding standard account on the plan year Schedule MB of Form 5500, include an explanation as a footnote to this table.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN:	23-6209755
PN:	001

Unit (e.g. hourly, weekly)	DAILY SHIFTS
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All Other Sources of Non-Investment Income

Plan Year (in order from oldest to most recent)	Plan Year Start Date	Plan Year End Date	Total Contribution		Average Contribution Rate	Reciprocity Contributions (if applicable)	Additional Rehab Plan Contributions (if applicable)	Other - Explain if Applicable	Withdrawal Liability Payments Collected	Number of Active Participants at Beginning of Plan Year
			Total Contributions*	Base Units						
2010	1/1/2010	12/31/2010	\$261,117	52,223	\$5.00	\$0.00	\$0	\$0	\$0.00	229
2011	1/1/2011	12/31/2011	\$284,697	56,939	\$5.00	\$0.00	\$0	\$0	\$0.00	213
2012	1/1/2012	12/31/2012	\$289,619	50,544	\$5.73	\$0.00	\$0	\$0	\$0.00	214
2013	1/1/2013	12/31/2013	\$259,777	45,735	\$5.68	\$0.00	\$0	\$0	\$0.00	202
2014	1/1/2014	12/31/2014	\$235,060	41,530	\$5.66	\$0.00	\$0	\$0	\$0.00	168
2015	1/1/2015	12/31/2015	\$232,904	41,222	\$5.65	\$0.00	\$0	\$0	\$4,125.00	169
2016	1/1/2016	12/31/2016	\$218,491	38,603	\$5.66	\$0.00	\$0	\$0	\$0.00	164
2017	1/1/2017	12/31/2017	\$201,447	35,529	\$5.67	\$0.00	\$0	\$0	\$0.00	157
2018	1/1/2018	12/31/2018	\$188,797	33,298	\$5.67	\$0.00	\$0	\$0	\$0.00	144
2019	1/1/2019	12/31/2019	\$177,739	31,347	\$5.67	\$0.00	\$0	\$0	\$0.00	135
2020	1/1/2020	12/31/2020	\$40,756	6,222	\$6.55	\$0.00	\$0	\$0	\$0.00	31
2021	1/1/2021	12/31/2021	\$36,064	5,506	\$6.55	\$0.00	\$0	\$0	\$0.00	21
2022	1/1/2022	12/31/2022	\$33,346	5,091	\$6.55	\$0.00	\$0	\$0	\$0.00	23

* Total contributions shown here should be contributions based upon CBUs and should not include items separately shown in any columns under "All Other Sources of Non-Investment Income."

SFA Determination - non-SFA Interest Rate and SFA Interest Rate

Provide the non-SFA interest rate and SFA interest rate used, including supporting details on how they were determined.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN	
EIN:	23-6209755	
PN:	001	
Initial Application Date:	2/27/2023	
SFA Measurement Date:	11/30/2022	For a plan other than a plan described in § 4262.4(g) (i.e., for a plan that has <u>not</u> filed an initial application under PBGC's interim final rule), the last day of the third calendar month immediately preceding the plan's initial application date. For a plan described in § 4262.4(g) (i.e., for a plan that filed an initial application prior to publication of the final rule), the last day of the calendar quarter immediately preceding the plan's initial application date.
Last day of first plan year ending after the measurement date:	12/31/2022	

Non-SFA Interest Rate Used:	5.66%	Rate used in projection of non-SFA assets.
SFA Interest Rate Used:	3.48%	Rate used in projection of SFA assets.

Development of non-SFA interest rate and SFA interest rate:

Plan Interest Rate:	7.00%	Interest rate used for the funding standard account projections in the plan's most recently completed certification of plan status before 1/1/2021.
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Corresponding ERISA Section 303(h)(2)(C)(i), (ii), and (iii) rates disregarding modifications made under clause (iv) of such section.

Month Year	(i)	(ii)	(iii)		
Month in which plan's initial application is filed, and corresponding segment rates (leave (i), (ii), and (iii) blank if the IRS Notice for this month has not yet been issued):				24-month average segment rates without regard to interest rate stabilization rules. These rates are issued by IRS each month. For example, the applicable segment rates for August 2021 are 1.13%, 2.70%, and 3.38%. Those rates were issued in IRS Notice 21-50 on August 16, 2021 (see page 2 of notice under the heading "24-Month Average Segment Rates Without 25-Year Average Adjustment"). They are also available on IRS' Funding Yield Curve Segment Rate Tables web page (See Funding Table 3 under the heading "24-Month Average Segment Rates Not Adjusted").	
1 month preceding month in which plan's initial application is filed, and corresponding segment rates:	December 2022	1.95%	3.50%		3.85%
2 months preceding month in which plan's initial application is filed, and corresponding segment rates:	November 2022	1.76%	3.36%		3.76%
3 months preceding month in which plan's initial application is filed, and corresponding segment rates:	October 2022	1.57%	3.21%		3.66%

Non-SFA Interest Rate Limit (lowest 3rd segment rate plus 200 basis points):		5.66%	This amount is calculated based on the other information entered above.
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Non-SFA Interest Rate Calculation (lesser of Plan Interest Rate and Non-SFA Interest Rate Limit):	5.66%	This amount is calculated based on the other information entered above.
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Non-SFA Interest Rate Match Check:	Match	If the non-SFA Interest Rate Calculation is not equal to the non-SFA Interest Rate Used, provide explanation below.
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SFA Interest Rate Limit (lowest average of the 3 segment rates plus 67 basis points):		3.48%	This amount is calculated based on the other information entered.
---	--	-------	---

SFA Interest Rate Calculation (lesser of Plan Interest Rate and SFA Interest Rate Limit):	3.48%	This amount is calculated based on the other information entered above.
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SFA Interest Rate Match Check:	Match	If the SFA Interest Rate Calculation is not equal to the SFA Interest Rate Used, provide explanation below.
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TEMPLATE 4A - Sheet 4A-2

v20220802p

SFA Determination - Benefit Payments for the "basic method" for all plans, and for the "increasing assets method" for MRPA plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-2.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN:	23-6209755
PN:	001
SFA Measurement Date:	11/30/2022

		On this Sheet, show all benefit payment amounts as positive amounts.				
		PROJECTED BENEFIT PAYMENTS for:				
SFA Measurement Date / Plan Year Start Date	Plan Year End Date	Current Retirees and	Current Terminated	Current Active	New Entrants	Total
		Beneficiaries in Pay Status	Vested Participants	Participants		
11/30/2022	12/31/2022	\$113,605	\$2,713	\$81	\$0	\$116,399
1/1/2023	12/31/2023	\$1,321,168	\$44,667	\$2,752	\$5	\$1,368,592
1/1/2024	12/31/2024	\$1,161,627	\$55,469	\$10,194	\$16	\$1,227,306
1/1/2025	12/31/2025	\$1,103,091	\$78,878	\$15,911	\$42	\$1,197,922
1/1/2026	12/31/2026	\$1,045,974	\$94,120	\$21,231	\$61	\$1,161,386
1/1/2027	12/31/2027	\$989,134	\$115,504	\$28,238	\$138	\$1,133,014
1/1/2028	12/31/2028	\$932,700	\$148,153	\$37,236	\$261	\$1,118,350
1/1/2029	12/31/2029	\$876,816	\$169,411	\$41,088	\$415	\$1,087,730
1/1/2030	12/31/2030	\$821,654	\$195,208	\$46,682	\$596	\$1,064,140
1/1/2031	12/31/2031	\$767,394	\$218,468	\$48,256	\$804	\$1,034,922
1/1/2032	12/31/2032	\$714,215	\$235,554	\$52,821	\$1,074	\$1,003,664
1/1/2033	12/31/2033	\$662,297	\$248,889	\$55,139	\$1,344	\$967,669
1/1/2034	12/31/2034	\$611,819	\$268,894	\$57,201	\$1,615	\$939,529
1/1/2035	12/31/2035	\$562,945	\$284,033	\$57,324	\$1,885	\$906,187
1/1/2036	12/31/2036	\$515,822	\$288,527	\$56,395	\$2,133	\$862,877
1/1/2037	12/31/2037	\$470,576	\$289,710	\$58,415	\$2,390	\$821,091
1/1/2038	12/31/2038	\$427,309	\$288,535	\$59,019	\$2,638	\$777,501
1/1/2039	12/31/2039	\$386,106	\$286,504	\$59,924	\$2,870	\$735,404
1/1/2040	12/31/2040	\$346,836	\$285,490	\$58,381	\$3,290	\$693,997
1/1/2041	12/31/2041	\$310,158	\$283,912	\$56,455	\$3,298	\$653,823
1/1/2042	12/31/2042	\$275,524	\$282,709	\$54,426	\$3,495	\$616,154
1/1/2043	12/31/2043	\$243,180	\$280,673	\$52,014	\$4,162	\$580,029
1/1/2044	12/31/2044	\$213,159	\$279,865	\$49,395	\$5,013	\$547,432
1/1/2045	12/31/2045	\$185,483	\$275,305	\$50,559	\$6,040	\$517,387
1/1/2046	12/31/2046	\$160,156	\$263,865	\$47,901	\$7,172	\$479,094
1/1/2047	12/31/2047	\$137,165	\$252,568	\$45,047	\$8,324	\$443,104
1/1/2048	12/31/2048	\$116,476	\$242,395	\$42,059	\$9,653	\$410,583
1/1/2049	12/31/2049	\$98,030	\$230,734	\$38,991	\$11,008	\$378,763
1/1/2050	12/31/2050	\$81,749	\$217,652	\$36,066	\$12,344	\$347,811
1/1/2051	12/31/2051	\$67,525	\$204,130	\$35,211	\$13,637	\$320,503

TEMPLATE 4A - Sheet 4A-3

SFA Determination - Participant Count and Administrative Expenses for the "basic method" for all plans, and for the "increasing

See Template 4A Instructions for Additional Instructions for Sheet 4A-3.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN	
EIN:	23-6209755	
PN:	001	
SFA Measurement Date:	11/30/2022	

SFA Measurement Date / Plan Year Start Date		Plan Year End Date	Total Participant Count at Beginning of Plan Year	On this Sheet, show all administrative expense amounts as positive amounts		
				PROJECTED ADMINISTRATIVE EXPENSES for:		
				PBGC Premiums	Other	Total
11/30/2022	12/31/2022		686	\$0	\$2,616	\$2,616
1/1/2023	12/31/2023		668	\$23,380	\$164,800	\$188,180
1/1/2024	12/31/2024		649	\$23,364	\$117,670	\$141,034
1/1/2025	12/31/2025		629	\$23,273	\$120,612	\$143,885
1/1/2026	12/31/2026		610	\$23,180	\$123,627	\$146,807
1/1/2027	12/31/2027		591	\$23,049	\$126,718	\$149,767
1/1/2028	12/31/2028		572	\$22,880	\$129,886	\$152,766
1/1/2029	12/31/2029		553	\$22,673	\$133,133	\$155,806
1/1/2030	12/31/2030		534	\$22,428	\$136,461	\$158,889
1/1/2031	12/31/2031		515	\$26,780	\$139,873	\$166,653
1/1/2032	12/31/2032		495	\$26,235	\$143,370	\$169,605
1/1/2033	12/31/2033		477	\$26,235	\$146,954	\$173,189
1/1/2034	12/31/2034		458	\$25,648	\$150,628	\$176,276
1/1/2035	12/31/2035		439	\$25,023	\$154,394	\$179,417
1/1/2036	12/31/2036		421	\$24,839	\$158,254	\$183,093
1/1/2037	12/31/2037		403	\$24,180	\$162,210	\$186,390
1/1/2038	12/31/2038		385	\$23,870	\$166,265	\$190,135
1/1/2039	12/31/2039		367	\$23,121	\$170,422	\$193,543
1/1/2040	12/31/2040		350	\$22,750	\$174,683	\$197,433
1/1/2041	12/31/2041		333	\$22,311	\$179,050	\$201,361
1/1/2042	12/31/2042		316	\$21,488	\$183,526	\$205,014
1/1/2043	12/31/2043		300	\$21,000	\$188,114	\$209,114
1/1/2044	12/31/2044		283	\$20,376	\$192,817	\$213,193
1/1/2045	12/31/2045		268	\$19,564	\$197,637	\$217,201
1/1/2046	12/31/2046		253	\$18,975	\$202,578	\$221,553
1/1/2047	12/31/2047		238	\$18,326	\$207,642	\$225,968
1/1/2048	12/31/2048		224	\$17,696	\$212,833	\$230,529
1/1/2049	12/31/2049		210	\$17,010	\$218,154	\$235,164
1/1/2050	12/31/2050		197	\$16,351	\$223,608	\$239,959
1/1/2051	12/31/2051		185	\$15,725	\$229,198	\$244,923

TEMPLATE 4A - Sheet 4A-4

SFA Determination - Details for the "basic method" under § 4262.4(a)(1) for all plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-4.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN	
EIN:	23-6209755	
PN:	001	
MPRA Plan?	NO	Meets the definition of a MPRA plan described in § 4262.4(a)(3)?
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A	MPRA increasing assets method described in § 4262.4(a)(2)(i). MPRA present value method described in § 4262.4(a)(2)(ii).
SFA Measurement Date:	11/30/2022	
Fair Market Value of Assets as of the SFA Measurement Date:	\$238,382	
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$18,842,000	Per § 4262.4(a)(1), the lowest whole dollar amount (not less than \$0) for which, as of the last day of each plan year during the SFA coverage period, projected SFA assets and projected non-SFA assets are both greater than or equal to zero.
Projected SFA exhaustion year:	1/1/2052	Only required on this sheet if the requested amount of SFA is based on the "basic method". Plan Year Start Date of the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets.
Non-SFA Interest Rate:	5.66%	
SFA Interest Rate:	3.48%	

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Plan Year End Date		Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments (should match total from Sheet 4A-2)	Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA; should match total from Sheet 4A-3)	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	SFA Investment Income Based on SFA Interest Rate	Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	Non-SFA Investment Income Based on Non-SFA Interest Rate	Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
11/30/2022	12/31/2022	\$2,856	\$0	\$0	-\$116,399	-\$2,616	\$0	\$54,642	\$18,896,642	-\$119,015	\$850	\$123,073	
1/1/2023	12/31/2023	\$33,346	\$87,946	\$0	-\$1,145,938	-\$188,180	-\$1,433,699	\$634,767	\$18,219,002	-\$123,073	\$0	\$0	
1/1/2024	12/31/2024	\$33,346	\$0	\$0	-\$1,227,306	-\$141,034	-\$1,368,340	\$610,792	\$17,494,800				
1/1/2025	12/31/2025	\$33,346	\$0	\$0	-\$1,197,922	-\$143,885	-\$1,341,807	\$586,052	\$16,772,391				
1/1/2026	12/31/2026	\$33,346	\$0	\$0	-\$1,161,386	-\$146,807	-\$1,308,193	\$561,497	\$16,059,041				
1/1/2027	12/31/2027	\$33,346	\$0	\$0	-\$1,133,014	-\$149,767	-\$1,282,781	\$537,114	\$15,346,720				
1/1/2028	12/31/2028	\$33,346	\$0	\$0	-\$1,118,350	-\$152,766	-\$1,271,116	\$512,529	\$14,621,479				
1/1/2029	12/31/2029	\$33,346	\$0	\$0	-\$1,087,730	-\$155,806	-\$1,243,536	\$487,770	\$13,899,059				
1/1/2030	12/31/2030	\$33,346	\$0	\$0	-\$1,064,140	-\$158,889	-\$1,223,029	\$462,987	\$13,172,363				
1/1/2031	12/31/2031	\$33,346	\$0	\$0	-\$1,034,922	-\$166,653	-\$1,201,575	\$438,071	\$12,442,205				
1/1/2032	12/31/2032	\$33,346	\$0	\$0	-\$1,003,664	-\$169,605	-\$1,173,269	\$413,154	\$11,715,436				
1/1/2033	12/31/2033	\$33,346	\$0	\$0	-\$967,669	-\$173,189	-\$1,140,858	\$388,426	\$10,996,350				
1/1/2034	12/31/2034	\$33,346	\$0	\$0	-\$939,529	-\$176,276	-\$1,115,805	\$363,838	\$10,277,729				
1/1/2035	12/31/2035	\$33,346	\$0	\$0	-\$906,187	-\$179,417	-\$1,085,604	\$339,356	\$9,564,827				
1/1/2036	12/31/2036	\$33,346	\$0	\$0	-\$862,877	-\$183,093	-\$1,045,970	\$315,236	\$8,867,439				
1/1/2037	12/31/2037	\$33,346	\$0	\$0	-\$821,091	-\$186,390	-\$1,007,481	\$291,637	\$8,184,941				
1/1/2038	12/31/2038	\$33,346	\$0	\$0	-\$777,501	-\$190,135	-\$967,636	\$268,579	\$7,519,230				
1/1/2039	12/31/2039	\$33,346	\$0	\$0	-\$735,404	-\$193,543	-\$928,947	\$246,086	\$6,869,715				
1/1/2040	12/31/2040	\$33,346	\$0	\$0	-\$693,997	-\$197,433	-\$891,430	\$224,135	\$6,235,766				
1/1/2041	12/31/2041	\$33,346	\$0	\$0	-\$653,823	-\$201,361	-\$855,184	\$202,705	\$5,616,633				
1/1/2042	12/31/2042	\$33,346	\$0	\$0	-\$616,154	-\$205,014	-\$821,168	\$181,751	\$5,010,562				
1/1/2043	12/31/2043	\$33,346	\$0	\$0	-\$580,029	-\$209,114	-\$789,143	\$161,217	\$4,415,982				
1/1/2044	12/31/2044	\$33,346	\$0	\$0	-\$547,432	-\$213,193	-\$760,625	\$141,022	\$3,829,725				
1/1/2045	12/31/2045	\$33,346	\$0	\$0	-\$517,387	-\$217,201	-\$734,588	\$121,073	\$3,249,556				
1/1/2046	12/31/2046	\$33,346	\$0	\$0	-\$479,094	-\$221,553	-\$700,647	\$101,474	\$2,683,729				
1/1/2047	12/31/2047	\$33,346	\$0	\$0	-\$443,104	-\$225,968	-\$669,072	\$82,332	\$2,130,335				
1/1/2048	12/31/2048	\$33,346	\$0	\$0	-\$410,583	-\$230,529	-\$641,112	\$63,561	\$1,586,130				
1/1/2049	12/31/2049	\$33,346	\$0	\$0	-\$378,763	-\$235,164	-\$613,927	\$45,095	\$1,050,644				
1/1/2050	12/31/2050	\$33,346	\$0	\$0	-\$347,811	-\$239,959	-\$587,770	\$26,915	\$523,135				
1/1/2051	12/31/2051	\$33,346	\$0	\$0	-\$320,503	-\$244,923	-\$565,426	\$8,947	\$2				

TEMPLATE 5A - Sheet 5A-1

v20220802p

Baseline - Benefit Payments for the "basic method", or for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method"

See Template 4A instructions for Sheet 4A-2, except provide the benefit payment projection used to determine the Baseline SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN:	23-6209755
PN:	001
SFA Measurement Date:	11/30/2022

		On this Sheet, show all benefit payment amounts as positive amounts.				
		PROJECTED BENEFIT PAYMENTS for:				
SFA Measurement Date / Plan Year Start Date	Plan Year End Date	Current Retirees and Beneficiaries in Pay	Current Terminated	Current Active	New Entrants	Total
		Status	Vested Participants	Participants		
11/30/2022	12/31/2022	\$113,605	\$2,713	\$81	\$0	\$116,399
1/1/2023	12/31/2023	\$1,321,168	\$44,667	\$2,752	\$0	\$1,368,587
1/1/2024	12/31/2024	\$1,161,627	\$55,469	\$10,194	\$0	\$1,227,290
1/1/2025	12/31/2025	\$1,103,091	\$78,878	\$15,911	\$0	\$1,197,880
1/1/2026	12/31/2026	\$1,045,974	\$94,120	\$21,231	\$0	\$1,161,325
1/1/2027	12/31/2027	\$989,134	\$115,504	\$28,238	\$0	\$1,132,876
1/1/2028	12/31/2028	\$932,700	\$148,153	\$37,236	\$0	\$1,118,089
1/1/2029	12/31/2029	\$876,816	\$169,411	\$41,088	\$0	\$1,087,315
1/1/2030	12/31/2030	\$821,654	\$195,208	\$46,682	\$0	\$1,063,544
1/1/2031	12/31/2031	\$767,394	\$218,468	\$48,256	\$0	\$1,034,118
1/1/2032	12/31/2032	\$714,215	\$235,554	\$52,821	\$0	\$1,002,590
1/1/2033	12/31/2033	\$662,297	\$248,889	\$55,139	\$0	\$966,325
1/1/2034	12/31/2034	\$611,819	\$268,894	\$57,201	\$0	\$937,914
1/1/2035	12/31/2035	\$562,945	\$284,033	\$57,324	\$0	\$904,302
1/1/2036	12/31/2036	\$515,822	\$288,527	\$56,395	\$0	\$860,744
1/1/2037	12/31/2037	\$470,576	\$289,710	\$58,415	\$0	\$818,701
1/1/2038	12/31/2038	\$427,309	\$288,535	\$59,019	\$0	\$774,863
1/1/2039	12/31/2039	\$386,106	\$286,504	\$59,924	\$0	\$732,534
1/1/2040	12/31/2040	\$346,836	\$285,490	\$58,381	\$0	\$690,707
1/1/2041	12/31/2041	\$310,158	\$283,912	\$56,455	\$0	\$650,525
1/1/2042	12/31/2042	\$275,524	\$282,709	\$54,426	\$0	\$612,659
1/1/2043	12/31/2043	\$243,180	\$280,673	\$52,014	\$0	\$575,867
1/1/2044	12/31/2044	\$213,159	\$279,865	\$49,395	\$0	\$542,419
1/1/2045	12/31/2045	\$185,483	\$275,305	\$50,559	\$0	\$511,347
1/1/2046	12/31/2046	\$160,156	\$263,865	\$47,901	\$0	\$471,922
1/1/2047	12/31/2047	\$137,165	\$252,568	\$45,047	\$0	\$434,780
1/1/2048	12/31/2048	\$116,476	\$242,395	\$42,059	\$0	\$400,930
1/1/2049	12/31/2049	\$98,030	\$230,734	\$38,991	\$0	\$367,755
1/1/2050	12/31/2050	\$81,749	\$217,652	\$36,066	\$0	\$335,467
1/1/2051	12/31/2051	\$67,525	\$204,130	\$35,211	\$0	\$306,866

TEMPLATE 5A - Sheet 5A-2

v20220802p

Baseline - Participant Count and Administrative Expenses for the "basic method", or for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method"

See Template 4A instructions for Sheet 4A-3, except provide the projected total participant count and administrative expense projection used to determine the Baseline SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN	
EIN:	23-6209755	
PN:	001	
SFA Measurement Date:	11/30/2022	

On this Sheet, show all administrative expense amounts as positive amounts

PROJECTED ADMINISTRATIVE EXPENSES for:

SFA Measurement Date / Plan Year Start Date		Plan Year End Date	Total Participant Count at Beginning of Plan Year	PBGC Premiums	Other	Total
11/30/2022	12/31/2022		686	\$0	\$2,616	\$2,616
1/1/2023	12/31/2023		666	\$0	\$125,000	\$125,000
1/1/2024	12/31/2024		645	\$0	\$125,000	\$125,000
1/1/2025	12/31/2025		623	\$0	\$125,000	\$125,000
1/1/2026	12/31/2026		602	\$0	\$125,000	\$125,000
1/1/2027	12/31/2027		581	\$0	\$125,000	\$125,000
1/1/2028	12/31/2028		560	\$0	\$125,000	\$125,000
1/1/2029	12/31/2029		539	\$0	\$125,000	\$125,000
1/1/2030	12/31/2030		518	\$0	\$125,000	\$125,000
1/1/2031	12/31/2031		498	\$0	\$125,000	\$125,000
1/1/2032	12/31/2032		477	\$0	\$125,000	\$125,000
1/1/2033	12/31/2033		457	\$0	\$125,000	\$125,000
1/1/2034	12/31/2034		437	\$0	\$125,000	\$125,000
1/1/2035	12/31/2035		417	\$0	\$125,000	\$125,000
1/1/2036	12/31/2036		397	\$0	\$125,000	\$125,000
1/1/2037	12/31/2037		377	\$0	\$125,000	\$125,000
1/1/2038	12/31/2038		358	\$0	\$125,000	\$125,000
1/1/2039	12/31/2039		339	\$0	\$125,000	\$125,000
1/1/2040	12/31/2040		321	\$0	\$125,000	\$125,000
1/1/2041	12/31/2041		302	\$0	\$125,000	\$125,000
1/1/2042	12/31/2042		285	\$0	\$125,000	\$125,000
1/1/2043	12/31/2043		267	\$0	\$125,000	\$125,000
1/1/2044	12/31/2044		250	\$0	\$125,000	\$125,000
1/1/2045	12/31/2045		233	\$0	\$125,000	\$125,000
1/1/2046	12/31/2046		217	\$0	\$125,000	\$125,000
1/1/2047	12/31/2047		201	\$0	\$125,000	\$125,000
1/1/2048	12/31/2048		186	\$0	\$125,000	\$125,000
1/1/2049	12/31/2049		171	\$0	\$125,000	\$125,000
1/1/2050	12/31/2050		157	\$0	\$125,000	\$125,000
1/1/2051	12/31/2051		144	\$0	\$125,000	\$125,000

TEMPLATE 5A - Sheet 5A-3

Baseline - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the Baseline SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN:	23-6209755
PN:	001
MPRA Plan?	NO
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A
SFA Measurement Date:	11/30/2022
Fair Market Value of Assets as of the SFA Measurement Date:	\$238,382
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$17,764,929
Non-SFA Interest Rate:	5.66%
SFA Interest Rate:	3.48%

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date	Plan Year End Date	(1) Contributions	(2) Withdrawal Liability Payments	(3) Other Payments to Plan (excluding financial assistance and SFA)	(4) Benefit Payments (should match total from Sheet 5A-1)	(5) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	(6) Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA; should match total from Sheet 5A-2)	(7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	(8) SFA Investment Income Based on SFA Interest Rate	(9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	(10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	(11) Non-SFA Investment Income Based on Non-SFA Interest Rate	(12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
11/30/2022	12/31/2022	\$2,856	\$0	\$0	-\$116,399		-\$2,616	\$0	\$51,518	\$17,816,447	-\$119,015	\$850	\$123,073
1/1/2023	12/31/2023	\$32,750	\$87,946	\$0	-\$1,145,933	-\$99,581	-\$125,000	-\$1,370,514	\$598,266	\$17,164,895	-\$123,073	\$0	\$0
1/1/2024	12/31/2024	\$32,750	\$0	\$0	-\$1,227,290		-\$125,000	-\$1,352,290	\$574,378	\$16,419,733			
1/1/2025	12/31/2025	\$32,750	\$0	\$0	-\$1,197,880		-\$125,000	-\$1,322,880	\$548,958	\$15,678,561			
1/1/2026	12/31/2026	\$32,750	\$0	\$0	-\$1,161,325		-\$125,000	-\$1,286,325	\$523,802	\$14,948,788			
1/1/2027	12/31/2027	\$32,750	\$0	\$0	-\$1,132,876		-\$125,000	-\$1,257,876	\$498,901	\$14,222,563			
1/1/2028	12/31/2028	\$32,750	\$0	\$0	-\$1,118,089		-\$125,000	-\$1,243,089	\$473,885	\$13,486,109			
1/1/2029	12/31/2029	\$32,750	\$0	\$0	-\$1,087,315		-\$125,000	-\$1,212,315	\$448,792	\$12,755,336			
1/1/2030	12/31/2030	\$32,750	\$0	\$0	-\$1,063,544		-\$125,000	-\$1,188,544	\$423,775	\$12,023,317			
1/1/2031	12/31/2031	\$32,750	\$0	\$0	-\$1,034,118		-\$125,000	-\$1,159,118	\$398,813	\$11,295,762			
1/1/2032	12/31/2032	\$32,750	\$0	\$0	-\$1,002,590		-\$125,000	-\$1,127,590	\$374,042	\$10,574,964			
1/1/2033	12/31/2033	\$32,750	\$0	\$0	-\$966,325		-\$125,000	-\$1,091,325	\$349,590	\$9,865,979			
1/1/2034	12/31/2034	\$32,750	\$0	\$0	-\$937,914		-\$125,000	-\$1,062,914	\$325,411	\$9,161,226			
1/1/2035	12/31/2035	\$32,750	\$0	\$0	-\$904,302		-\$125,000	-\$1,029,302	\$301,471	\$8,466,145			
1/1/2036	12/31/2036	\$32,750	\$0	\$0	-\$860,744		-\$125,000	-\$985,744	\$278,040	\$7,791,191			
1/1/2037	12/31/2037	\$32,750	\$0	\$0	-\$818,701		-\$125,000	-\$943,701	\$255,283	\$7,135,523			
1/1/2038	12/31/2038	\$32,750	\$0	\$0	-\$774,863		-\$125,000	-\$899,863	\$233,228	\$6,501,638			
1/1/2039	12/31/2039	\$32,750	\$0	\$0	-\$732,534		-\$125,000	-\$857,534	\$211,906	\$5,888,760			
1/1/2040	12/31/2040	\$32,750	\$0	\$0	-\$690,707		-\$125,000	-\$815,707	\$191,305	\$5,297,108			
1/1/2041	12/31/2041	\$32,750	\$0	\$0	-\$650,525		-\$125,000	-\$775,525	\$171,415	\$4,725,748			
1/1/2042	12/31/2042	\$32,750	\$0	\$0	-\$612,659		-\$125,000	-\$737,659	\$152,191	\$4,173,030			
1/1/2043	12/31/2043	\$32,750	\$0	\$0	-\$575,867		-\$125,000	-\$700,867	\$133,596	\$3,638,509			
1/1/2044	12/31/2044	\$32,750	\$0	\$0	-\$542,419		-\$125,000	-\$667,419	\$115,577	\$3,119,417			
1/1/2045	12/31/2045	\$32,750	\$0	\$0	-\$511,347		-\$125,000	-\$636,347	\$98,053	\$2,613,873			
1/1/2046	12/31/2046	\$32,750	\$0	\$0	-\$471,922		-\$125,000	-\$596,922	\$81,146	\$2,130,847			
1/1/2047	12/31/2047	\$32,750	\$0	\$0	-\$434,780		-\$125,000	-\$559,780	\$64,983	\$1,668,800			
1/1/2048	12/31/2048	\$32,750	\$0	\$0	-\$400,930		-\$125,000	-\$525,930	\$49,493	\$1,225,113			
1/1/2049	12/31/2049	\$32,750	\$0	\$0	-\$367,755		-\$125,000	-\$492,755	\$34,630	\$799,738			
1/1/2050	12/31/2050	\$32,750	\$0	\$0	-\$335,467		-\$125,000	-\$460,467	\$20,389	\$392,410			
1/1/2051	12/31/2051	\$32,750	\$0	\$0	-\$306,866		-\$125,000	-\$431,866	\$6,711	\$5			

TEMPLATE 6A - Sheet 6A-1

Reconciliation - Summary for the "basic method", or for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method"

See Template 6A Instructions for Additional Instructions for Sheet 6A-1.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN:	23-6209755
PN:	001
MPRA Plan?	NO
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A

Item number	Basis for Assumptions/Methods. For each Item, briefly describe the incremental change reflected in the SFA amount.	Change in SFA Amount (from prior Item number)	SFA Amount	
1	Baseline	N/A	\$17,764,929	NOTE: A sheet with Recon Details is not required for the last Item number provided, since that information should be the same as provided in Template 4A. From Template 5A.
2	SHIFTS INCREASED FROM 5000 TO 5091	(\$10,932)	\$17,753,997	Show details supporting the SFA amount on Sheet 6A-2.
3	ADD NEW ENTRANTS FOR BENEFIT PAYMENTS	\$49,589	\$17,803,586	Show details supporting the SFA amount on Sheet 6A-3.
4	INCREASE IN ADMINISTRATIVE EXPENSES	\$1,038,414	\$18,842,000	Show details supporting the SFA amount on Sheet 6A-4.
5				Show details supporting the SFA amount on Sheet 6A-5.

Create additional rows as needed, and create additional detailed sheets by copying Sheet 6A-5 and re-labeling the header and the sheet name to be 6A-6, 6A-7, etc.

TEMPLATE 6A - Sheet 6A-2

Item Description (from 6A-1):

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN:	23-6209755
PN:	001
MPRA Plan?	NO
If a MPRA Plan, which method yields the greatest amount of SFA?	
SFA Measurement Date:	11/30/2022
Fair Market Value of Assets as of the SFA Measurement Date:	\$238,382
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$17,753,997
Non-SFA Interest Rate:	5.66%
SFA Interest Rate:	3.48%

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date		(1) Contributions	(2) Withdrawal Liability Payments	(3) Other Payments to Plan (excluding financial assistance and SFA)	(4) Benefit Payments	(5) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	(6) Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA)	(7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	(8) SFA Investment Income Based on SFA Interest Rate	(9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	(10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	(11) Non-SFA Investment Income Based on Non-SFA Interest Rate	(12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
11/30/2022	12/31/2022	\$2,856	\$0	\$0	-\$116,399		-\$2,616	\$0	\$51,487	\$17,805,484	-\$119,015	\$850	\$123,073
1/1/2023	12/31/2023	\$33,346	\$87,946	\$0	-\$1,145,933	-\$99,581	-\$125,000	-\$1,370,514	\$597,894	\$17,154,156	-\$123,073	\$0	\$0
1/1/2024	12/31/2024	\$33,346	\$0	\$0	-\$1,227,290		-\$125,000	-\$1,352,290	\$574,015	\$16,409,227			
1/1/2025	12/31/2025	\$33,346	\$0	\$0	-\$1,197,880		-\$125,000	-\$1,322,880	\$548,603	\$15,668,296			
1/1/2026	12/31/2026	\$33,346	\$0	\$0	-\$1,161,325		-\$125,000	-\$1,286,325	\$523,455	\$14,938,772			
1/1/2027	12/31/2027	\$33,346	\$0	\$0	-\$1,132,876		-\$125,000	-\$1,257,876	\$498,562	\$14,212,804			
1/1/2028	12/31/2028	\$33,346	\$0	\$0	-\$1,118,089		-\$125,000	-\$1,243,089	\$473,556	\$13,476,617			
1/1/2029	12/31/2029	\$33,346	\$0	\$0	-\$1,087,315		-\$125,000	-\$1,212,315	\$448,472	\$12,746,120			
1/1/2030	12/31/2030	\$33,346	\$0	\$0	-\$1,063,544		-\$125,000	-\$1,188,544	\$423,465	\$12,014,387			
1/1/2031	12/31/2031	\$33,346	\$0	\$0	-\$1,034,118		-\$125,000	-\$1,159,118	\$398,512	\$11,287,127			
1/1/2032	12/31/2032	\$33,346	\$0	\$0	-\$1,002,590		-\$125,000	-\$1,127,590	\$373,752	\$10,566,635			
1/1/2033	12/31/2033	\$33,346	\$0	\$0	-\$966,325		-\$125,000	-\$1,091,325	\$349,310	\$9,857,966			
1/1/2034	12/31/2034	\$33,346	\$0	\$0	-\$937,914		-\$125,000	-\$1,062,914	\$325,143	\$9,153,541			
1/1/2035	12/31/2035	\$33,346	\$0	\$0	-\$904,302		-\$125,000	-\$1,029,302	\$301,214	\$8,458,799			
1/1/2036	12/31/2036	\$33,346	\$0	\$0	-\$860,744		-\$125,000	-\$985,744	\$277,794	\$7,784,195			
1/1/2037	12/31/2037	\$33,346	\$0	\$0	-\$818,701		-\$125,000	-\$943,701	\$255,050	\$7,128,890			
1/1/2038	12/31/2038	\$33,346	\$0	\$0	-\$774,863		-\$125,000	-\$899,863	\$233,008	\$6,495,381			
1/1/2039	12/31/2039	\$33,346	\$0	\$0	-\$732,534		-\$125,000	-\$857,534	\$211,698	\$5,882,891			
1/1/2040	12/31/2040	\$33,346	\$0	\$0	-\$690,707		-\$125,000	-\$815,707	\$191,112	\$5,291,642			
1/1/2041	12/31/2041	\$33,346	\$0	\$0	-\$650,525		-\$125,000	-\$775,525	\$171,235	\$4,720,698			
1/1/2042	12/31/2042	\$33,346	\$0	\$0	-\$612,659		-\$125,000	-\$737,659	\$152,025	\$4,168,410			
1/1/2043	12/31/2043	\$33,346	\$0	\$0	-\$575,867		-\$125,000	-\$700,867	\$133,446	\$3,634,335			
1/1/2044	12/31/2044	\$33,346	\$0	\$0	-\$542,419		-\$125,000	-\$667,419	\$115,442	\$3,115,704			
1/1/2045	12/31/2045	\$33,346	\$0	\$0	-\$511,347		-\$125,000	-\$636,347	\$97,934	\$2,610,637			
1/1/2046	12/31/2046	\$33,346	\$0	\$0	-\$471,922		-\$125,000	-\$596,922	\$81,044	\$2,128,105			
1/1/2047	12/31/2047	\$33,346	\$0	\$0	-\$434,780		-\$125,000	-\$559,780	\$64,898	\$1,666,569			
1/1/2048	12/31/2048	\$33,346	\$0	\$0	-\$400,930		-\$125,000	-\$525,930	\$49,426	\$1,223,411			
1/1/2049	12/31/2049	\$33,346	\$0	\$0	-\$367,755		-\$125,000	-\$492,755	\$34,581	\$798,583			
1/1/2050	12/31/2050	\$33,346	\$0	\$0	-\$335,467		-\$125,000	-\$460,467	\$20,359	\$391,821			
1/1/2051	12/31/2051	\$33,346	\$0	\$0	-\$306,866		-\$125,000	-\$431,866	\$6,701	\$2			

TEMPLATE 6A - Sheet 6A-3

Item Description (from 6A-1):

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN:	23-6209755
PN:	001
MPRA Plan?	NO
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A
SFA Measurement Date:	11/30/2022
Fair Market Value of Assets as of the SFA Measurement Date:	\$238,382
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$17,803,586
Non-SFA Interest Rate:	5.66%
SFA Interest Rate:	3.48%

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date		(1) Contributions	(2) Withdrawal Liability Payments	(3) Other Payments to Plan (excluding financial assistance and SFA)	(4) Benefit Payments	(5) Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	(6) Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA)	(7) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	(8) SFA Investment Income Based on SFA Interest Rate	(9) Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	(10) Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	(11) Non-SFA Investment Income Based on Non-SFA Interest Rate	(12) Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
11/30/2022	12/31/2022	\$2,856	\$0	\$0	-\$116,399		-\$2,616	\$0	\$51,630	\$17,855,216	-\$119,015	\$850	\$123,073
1/1/2023	12/31/2023	\$33,346	\$87,946	\$0	-\$1,145,933	-\$99,581	-\$125,000	-\$1,370,514	\$599,625	\$17,205,619	-\$123,073	\$0	\$0
1/1/2024	12/31/2024	\$33,346	\$0	\$0	-\$1,227,306		-\$125,000	-\$1,352,306	\$575,806	\$16,462,465			
1/1/2025	12/31/2025	\$33,346	\$0	\$0	-\$1,197,922		-\$125,000	-\$1,322,922	\$550,455	\$15,723,344			
1/1/2026	12/31/2026	\$33,346	\$0	\$0	-\$1,161,386		-\$125,000	-\$1,286,386	\$525,369	\$14,995,673			
1/1/2027	12/31/2027	\$33,346	\$0	\$0	-\$1,133,014		-\$125,000	-\$1,258,014	\$500,540	\$14,271,545			
1/1/2028	12/31/2028	\$33,346	\$0	\$0	-\$1,118,350		-\$125,000	-\$1,243,350	\$475,596	\$13,537,137			
1/1/2029	12/31/2029	\$33,346	\$0	\$0	-\$1,087,730		-\$125,000	-\$1,212,730	\$450,571	\$12,808,324			
1/1/2030	12/31/2030	\$33,346	\$0	\$0	-\$1,064,140		-\$125,000	-\$1,189,140	\$425,619	\$12,078,149			
1/1/2031	12/31/2031	\$33,346	\$0	\$0	-\$1,034,922		-\$125,000	-\$1,159,922	\$400,717	\$11,352,290			
1/1/2032	12/31/2032	\$33,346	\$0	\$0	-\$1,003,664		-\$125,000	-\$1,128,664	\$376,001	\$10,632,973			
1/1/2033	12/31/2033	\$33,346	\$0	\$0	-\$967,669		-\$125,000	-\$1,092,669	\$351,595	\$9,925,245			
1/1/2034	12/31/2034	\$33,346	\$0	\$0	-\$939,529		-\$125,000	-\$1,064,529	\$327,456	\$9,221,518			
1/1/2035	12/31/2035	\$33,346	\$0	\$0	-\$906,187		-\$125,000	-\$1,031,187	\$303,546	\$8,527,223			
1/1/2036	12/31/2036	\$33,346	\$0	\$0	-\$862,877		-\$125,000	-\$987,877	\$280,139	\$7,852,831			
1/1/2037	12/31/2037	\$33,346	\$0	\$0	-\$821,091		-\$125,000	-\$946,091	\$257,397	\$7,197,483			
1/1/2038	12/31/2038	\$33,346	\$0	\$0	-\$777,501		-\$125,000	-\$902,501	\$235,349	\$6,563,677			
1/1/2039	12/31/2039	\$33,346	\$0	\$0	-\$735,404		-\$125,000	-\$860,404	\$214,025	\$5,950,644			
1/1/2040	12/31/2040	\$33,346	\$0	\$0	-\$693,997		-\$125,000	-\$818,997	\$193,412	\$5,358,405			
1/1/2041	12/31/2041	\$33,346	\$0	\$0	-\$653,823		-\$125,000	-\$778,823	\$173,501	\$4,786,429			
1/1/2042	12/31/2042	\$33,346	\$0	\$0	-\$616,154		-\$125,000	-\$741,154	\$154,252	\$4,232,873			
1/1/2043	12/31/2043	\$33,346	\$0	\$0	-\$580,029		-\$125,000	-\$705,029	\$135,617	\$3,696,807			
1/1/2044	12/31/2044	\$33,346	\$0	\$0	-\$547,432		-\$125,000	-\$672,432	\$117,529	\$3,175,250			
1/1/2045	12/31/2045	\$33,346	\$0	\$0	-\$517,387		-\$125,000	-\$642,387	\$99,901	\$2,666,110			
1/1/2046	12/31/2046	\$33,346	\$0	\$0	-\$479,094		-\$125,000	-\$604,094	\$82,850	\$2,178,212			
1/1/2047	12/31/2047	\$33,346	\$0	\$0	-\$443,104		-\$125,000	-\$568,104	\$66,497	\$1,709,951			
1/1/2048	12/31/2048	\$33,346	\$0	\$0	-\$410,583		-\$125,000	-\$535,583	\$50,767	\$1,258,481			
1/1/2049	12/31/2049	\$33,346	\$0	\$0	-\$378,763		-\$125,000	-\$503,763	\$35,610	\$823,674			
1/1/2050	12/31/2050	\$33,346	\$0	\$0	-\$347,811		-\$125,000	-\$472,811	\$21,017	\$405,226			
1/1/2051	12/31/2051	\$33,346	\$0	\$0	-\$320,503		-\$125,000	-\$445,503	\$6,930	-\$1			

TEMPLATE 6A - Sheet 6A-4

Item Description (from 6A-1):

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN
EIN:	23-6209755
PN:	001
MPRA Plan?	NO
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A
SFA Measurement Date:	11/30/2022
Fair Market Value of Assets as of the SFA Measurement Date:	\$238,382
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$18,842,000
Non-SFA Interest Rate:	5.66%
SFA Interest Rate:	3.48%

		On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.											
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
SFA Measurement Date / Plan Year Start Date	Plan Year End Date	Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments	Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA)	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	SFA Investment Income Based on SFA Interest Rate	Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	Non-SFA Investment Income Based on Non-SFA Interest Rate	Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
		11/30/2022	12/31/2022	\$2,856	\$0	\$0	-\$116,399	-\$2,616	\$0	\$54,642	\$18,896,642	-\$119,015	\$850
1/1/2023	12/31/2023	\$33,346	\$87,946	\$0	-\$1,145,938	-\$99,581	-\$188,180	-\$1,433,699	\$634,767	\$18,219,002	-\$123,073	\$0	\$0
1/1/2024	12/31/2024	\$33,346	\$0	\$0	-\$1,227,306		-\$141,034	-\$1,368,340	\$610,792	\$17,494,800			
1/1/2025	12/31/2025	\$33,346	\$0	\$0	-\$1,197,922		-\$143,885	-\$1,341,807	\$586,052	\$16,772,391			
1/1/2026	12/31/2026	\$33,346	\$0	\$0	-\$1,161,386		-\$146,807	-\$1,308,193	\$561,497	\$16,059,041			
1/1/2027	12/31/2027	\$33,346	\$0	\$0	-\$1,133,014		-\$149,767	-\$1,282,781	\$537,114	\$15,346,720			
1/1/2028	12/31/2028	\$33,346	\$0	\$0	-\$1,118,350		-\$152,766	-\$1,271,116	\$512,529	\$14,621,479			
1/1/2029	12/31/2029	\$33,346	\$0	\$0	-\$1,087,730		-\$155,806	-\$1,243,536	\$487,770	\$13,899,059			
1/1/2030	12/31/2030	\$33,346	\$0	\$0	-\$1,064,140		-\$158,889	-\$1,223,029	\$462,987	\$13,172,363			
1/1/2031	12/31/2031	\$33,346	\$0	\$0	-\$1,034,922		-\$166,653	-\$1,201,575	\$438,071	\$12,442,205			
1/1/2032	12/31/2032	\$33,346	\$0	\$0	-\$1,003,664		-\$169,605	-\$1,173,269	\$413,154	\$11,715,436			
1/1/2033	12/31/2033	\$33,346	\$0	\$0	-\$967,669		-\$173,189	-\$1,140,858	\$388,426	\$10,996,350			
1/1/2034	12/31/2034	\$33,346	\$0	\$0	-\$939,529		-\$176,276	-\$1,115,805	\$363,838	\$10,277,729			
1/1/2035	12/31/2035	\$33,346	\$0	\$0	-\$906,187		-\$179,417	-\$1,085,604	\$339,356	\$9,564,827			
1/1/2036	12/31/2036	\$33,346	\$0	\$0	-\$862,877		-\$183,093	-\$1,045,970	\$315,236	\$8,867,439			
1/1/2037	12/31/2037	\$33,346	\$0	\$0	-\$821,091		-\$186,390	-\$1,007,481	\$291,637	\$8,184,941			
1/1/2038	12/31/2038	\$33,346	\$0	\$0	-\$777,501		-\$190,135	-\$967,636	\$268,579	\$7,519,230			
1/1/2039	12/31/2039	\$33,346	\$0	\$0	-\$735,404		-\$193,543	-\$928,947	\$246,086	\$6,869,715			
1/1/2040	12/31/2040	\$33,346	\$0	\$0	-\$693,997		-\$197,433	-\$891,430	\$224,135	\$6,235,766			
1/1/2041	12/31/2041	\$33,346	\$0	\$0	-\$653,823		-\$201,361	-\$855,184	\$202,705	\$5,616,633			
1/1/2042	12/31/2042	\$33,346	\$0	\$0	-\$616,154		-\$205,014	-\$821,168	\$181,751	\$5,010,562			
1/1/2043	12/31/2043	\$33,346	\$0	\$0	-\$580,029		-\$209,114	-\$789,143	\$161,217	\$4,415,982			
1/1/2044	12/31/2044	\$33,346	\$0	\$0	-\$547,432		-\$213,193	-\$760,625	\$141,022	\$3,829,725			
1/1/2045	12/31/2045	\$33,346	\$0	\$0	-\$517,387		-\$217,201	-\$734,588	\$121,073	\$3,249,556			
1/1/2046	12/31/2046	\$33,346	\$0	\$0	-\$479,094		-\$221,553	-\$700,647	\$101,474	\$2,683,729			
1/1/2047	12/31/2047	\$33,346	\$0	\$0	-\$443,104		-\$225,968	-\$669,072	\$82,332	\$2,130,335			
1/1/2048	12/31/2048	\$33,346	\$0	\$0	-\$410,583		-\$230,529	-\$641,112	\$63,561	\$1,586,130			
1/1/2049	12/31/2049	\$33,346	\$0	\$0	-\$378,763		-\$235,164	-\$613,927	\$45,095	\$1,050,644			
1/1/2050	12/31/2050	\$33,346	\$0	\$0	-\$347,811		-\$239,959	-\$587,770	\$26,915	\$523,135			
1/1/2051	12/31/2051	\$33,346	\$0	\$0	-\$320,503		-\$244,923	-\$565,426	\$8,947	\$2			

TEMPLATE 8

File name: *Template 8 Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

v20220802p

Contribution and Withdrawal Liability Details

Provide details of the projected contributions and withdrawal liability payments used to calculate the requested SFA amount. This should include total contributions, contribution base units (including identification of the base unit used (i.e., hourly, weekly)), average contribution rate(s), reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if applicable), and any other identifiable contribution streams. For withdrawal liability, separately show amounts for currently withdrawn employers and for future assumed withdrawals. Also provide the projected number of active participants at the beginning of each plan year.

The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

PLAN INFORMATION

Abbreviated Plan Name: **BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN**

EIN: **23-6209755**

PN: **001**

Unit (e.g. hourly, weekly): **Daily shifts**

All Other Sources of Non-Investment Income

SFA Measurement Date / Plan Year Start Date	Plan Year End Date	Total Contributions*	Total Contribution Base Units	Average Contribution Rate	Reciprocity Contributions (if applicable)	Additional Rehab Plan Contributions (if applicable)	Other - Explain if Applicable	Withdrawal Liability Payments for Currently Withdrawn Employers	Withdrawal Liability Payments for Projected Future Withdrawals	Projected Number of Active Participants (Including New Entrants) at the Beginning of the Plan Year
11/30/2022	12/31/2022	\$2,856	436	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2023	12/31/2023	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$87,946	\$0	23
1/1/2024	12/31/2024	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2025	12/31/2025	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2026	12/31/2026	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2027	12/31/2027	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2028	12/31/2028	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2029	12/31/2029	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2030	12/31/2030	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2031	12/31/2031	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2032	12/31/2032	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2033	12/31/2033	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2034	12/31/2034	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2035	12/31/2035	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2036	12/31/2036	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2037	12/31/2037	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2038	12/31/2038	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2039	12/31/2039	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2040	12/31/2040	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2041	12/31/2041	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2042	12/31/2042	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2043	12/31/2043	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2044	12/31/2044	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2045	12/31/2045	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2046	12/31/2046	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2047	12/31/2047	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2048	12/31/2048	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2049	12/31/2049	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2050	12/31/2050	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23
1/1/2051	12/31/2051	\$33,346	5,091	\$6.55	\$0	\$0	\$0	\$0	\$0	23

* Total contributions shown here should be contributions based upon CBUs and should not include items separately shown in any columns under "All Other Sources of Non-Investment Income."

Template 7 - Sheet 7b

v20220701p

Assumption/Method Changes - SFA Amount

PLAN INFORMATION

Abbreviated Plan Name:	BINDERY INDUSTRY EMPLOYERS GCC/IBT PENSION PLAN	
EIN:	23-6209755	
PN:	001	

	(A)	(B)	(C)
Assumption/Method That Has Changed From Assumption Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021	Brief description of assumption/method used in the most recent certification of plan status completed prior to 1/1/2021	Brief description of assumption/method used to determine the requested SFA amount (if different)	Brief explanation on why the assumption/method in (A) is no longer reasonable and why the assumption/method in (B) is reasonable
Administrative Expenses	\$125,000 per year added to normal cost with no inflation adjustment	About \$188,000 for 2023 and about \$141,000 for 2024, with expenses increasing by 2.5% per year thereafter, except for 2031, when PBGC premiums are expected to increase by about 19% to \$52 per participant.	The assumption for 2020 certification purposes is no longer reasonable because (i) recent experience results in a different starting assumption, (ii) the Plan will no longer be insolvent, and (iii) PBGC premiums will be required.
New entrants	New entrants assumed to keep normal cost the same, but projected benefit payments made on a closed group basis.	New entrants assumed to keep number of active participants the same and projected benefit payments are made on an open group basis. The new entrant profile is based on actual experience during the 5 years preceding the SFA measurement date.	The assumption for 2020 certification purposes is no longer reasonable because (i) the Plan will no longer be insolvent and (ii) a 30-year projection is required for SFA application purposes.
Contribution base units	Estimated 5,000 shifts per year, recognizing the bankruptcy of one large contributing employer in 2019.	Estimated 5,091 shifts per year, based on actual 2022 experience.	The assumption for 2020 certification purposes is no longer reasonable because more recent information (as of December 31, 2022) is now available.
Withdrawal Liability	None	A known withdrawal liability contribution of \$87,946 is reflected in 2023. Withdrawal liability contributions in 2024 and later are assumed to be zero.	The assumption for 2020 certification purposes is no longer reasonable because more recent (actual) information is now available.



February 24, 2023

To whom it may concern:

Please see the US Bank wire instructions for the Bindery Industry Employers GCC/IBT Pension Plan as follows:

FUNDS to:

Name of Bank: US Bank

ABA Number: 091000022

For Benefit of Account Name: Trust Custody Saint Paul

For Benefit of Account Number: [REDACTED]

For Further Credit Account Name: Bindery - PBGC

For Further Credit Account Number: [REDACTED]

Additional Instructions or Sub-Account: ATTN – Tarah Lowe

Custodian

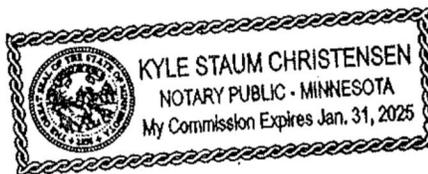
U.S. Bank

BY: Tarah Lowe [Signature]

Title: Officer / Account Manager

Date: 2/27/2023

NOTARY STAMP and SEAL



Kyle Christensen
Notary Public
State of Minnesota
Anoka County
[Signature] 02/27/2023

**ACH VENDOR/MISCELLANEOUS PAYMENT
ENROLLMENT FORM**

OMB No. 1530-0089

This form is used for Automated Clearing House (ACH) payments with an addendum record that contains payment-related information processed through the Vendor Express Program. Recipients of these payments should bring this information to the attention of their financial institution when presenting this form for completion. See reverse for additional instructions.

PRIVACY ACT STATEMENT

The following information is provided to comply with the Privacy Act of 1974 (P.L. 93-579). All information collected on this form is required under the provisions of 31 U.S.C. 3322 and 31 CFR 210. This information will be used by the Treasury Department to transmit payment data, by electronic means to vendor's financial institution. Failure to provide the requested information may delay or prevent the receipt of payments through the Automated Clearing House Payment System.

AGENCY INFORMATION

FEDERAL PROGRAM AGENCY

AGENCY IDENTIFIER:

AGENCY LOCATION CODE (ALC):

ACH FORMAT:

CCD+

CTX:

ADDRESS:

CONTACT PERSON NAME:

TELEPHONE NUMBER:

ADDITIONAL INFORMATION:

PAYEE/COMPANY INFORMATION

NAME

Bindery Industry Employers GCC/IBT Pension Plan

SSN NO. OR TAXPAYER ID NO.

ADDRESS

c/o richard Gabriel associates / RAE Consulting, 601 Dresher Road, Suite 201
Horsham, PA 19044

CONTACT PERSON NAME:

Cynthia A. Swartz

TELEPHONE NUMBER:

(215) 773-0900

FINANCIAL INSTITUTION INFORMATION

NAME:

US Bank

ADDRESS:

60 Livingston Ave

Saint Paul, MN 55107

ACH COORDINATOR NAME:

Tarah Lowe

TELEPHONE NUMBER:

(651) 466-6259

NINE-DIGIT ROUTING TRANSIT NUMBER:

09 100 0022

DEPOSITOR ACCOUNT TITLE:

Trust Custody Saint Paul

DEPOSITOR ACCOUNT NUMBER:

[REDACTED]

LOCKBOX NUMBER:

TYPE OF ACCOUNT:

CHECKING

SAVINGS

LOCKBOX

SIGNATURE AND TITLE OF AUTHORIZED OFFICIAL:

(Could be the same as ACH Coordinator)

[Handwritten Signature] Officer/Account Manager

TELEPHONE NUMBER:

(651) 466-6259

AUTHORIZED FOR LOCAL REPRODUCTION

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: **AUG 17 2015**

BOARD OF TRUSTEES BINDERY INDUSTRY
EMPLOYERS GCC IBT PENSION PLAN
601 DRESHER ROAD STE 201
HORSHAM, PA 19044

Employer Identification Number:
23-6209755
DLN:
17007034097005
Person to Contact:
PAMELA GRIFFIN ID# [REDACTED]
Contact Telephone Number:
(312) 566-3812
Plan Name:
BINDERY INDUSTRY EMPLOYERS GCC IBT
PENSION PLAN
Plan Number: 001

Dear Applicant:

Based on the information you provided, we are issuing this favorable determination letter for your plan listed above. However, our favorable determination only applies to the status of your plan under the Internal Revenue Code and is not a determination on the effect of other federal or local statutes. To use this letter as proof of the plan's status, you must keep this letter, the application forms, and all correspondence with us about your application.

Your determination letter does not apply to any qualification changes that become effective, any guidance issued, or any statutes enacted after the dates specified in the Cumulative List of Changes in Plan Requirements (the Cumulative List) for the cycle you submitted your application under, unless the new item was identified in the Cumulative List.

Your plan's continued qualification in its present form will depend on its effect in operation (Section 1.401-1(b)(3) of the Income Tax Regulations). We may review the status of the plan in operation periodically.

You can find more information on favorable determination letters in Publication 794, Favorable Determination Letter, including:

- The significance and scope of reliance on this letter
- The effect of any elective determination request in your application materials
- The reporting requirements for qualified plans
- Examples of the effect of a plan's operation on its qualified status.

You can get a copy of Publication 794 by visiting our website at www.irs.gov/formspubs or by calling 1-800-TAX-FORM (1-800-829-3676) to request a copy.

This determination letter applies to the amendments dated on 1-15-15 & 10-3-14.

This determination letter also applies to the amendments dated on

Letter 5274

BOARD OF TRUSTEES BINDERY INDUSTRY

9-7-11 & 5-26-11.

This determination letter also applies to the amendments dated on 2-16-11 & 11-4-10.

You can't rely on this letter after the end of the plan's first five-year remedial amendment cycle that ends more than 12 months after we received the application. This letter expires on January 31, 2020. This letter considered the 2013 Cumulative List of Changes in Plan Qualification Requirements.

The information on the enclosed addendum is an integral part of this determination. Please be sure to read it and keep it with this letter.

If you submitted a Form 2848, Power of Attorney and Declaration of Representative, or Form 8821, Tax Information Authorization, with your application and asked us to send your authorized representative or appointee copies of written communications, we will send a copy of this letter to him or her.

If you have any questions, you can contact the person listed at the top of this letter.

Sincerely,

A handwritten signature in black ink that reads "Karen D. Truss". The signature is written in a cursive style with a large, stylized "K" and "T".

Karen D. Truss
Director, EP Rulings & Agreements

Addendum

BOARD OF TRUSTEES BINDERY INDUSTRY

This determination letter does not apply to any portions of the document that incorporate the terms of an auxiliary agreement (collective bargaining, reciprocity, or participation agreement), unless you append to the plan document the exact language of the sections that you incorporated by reference.

Letter 5274

Bindery Industry Employers GCC/IBT Pension Plan

EIN: 23-6209755 PN: 001

Application for Special Financial Assistance

Section B, Item (9) - Death Audit Information and Certification

The Bindery Pension Plan utilizes LifeStatus360 for its death audit provider. The Plan Administrator submits the Plan's pensioners, beneficiaries in pay status, and vested terminated participants to LifeStatus360 annually. LifeStatus360 continuously monitors the data population on their proprietary SaaS platform.

LifeStatus360 provides daily updates. If there is a match, LifeStatus360 provides the Plan Administrator a report. The Plan Administrator verifies that the reported death is indeed the Plan participant.

This file contains documentation of a death audit to identify deceased participants that was completed no earlier than one year before November 30, 2022, the SFA measurement date, including a summary of deaths that were reported during 2021. It includes the identification of the service provider conducting the audit as well as a copy of the results of the audit provided to the Plan administrator. Any personally identifiable information included in the report has been redacted.

I certify that all participants reported as deceased prior to January 1, 2022 were reflected (i.e., not included) in the January 1, 2022 census data which was used for SFA application purposes.



Cynthia A. Swartz, CEBS

Plan Administrator

rGa/RAE Group LLC

601 Dresher Road, Suite 201

Horsham, PA 19044

cindy.swartz@rae-consulting.net

#	Record ID	Group	Q	SSN	Last Name	First Name	DOB	DOD	Source	Record Notes	Location of Death
2	BIN	R	100						SSA		
11	BIN	V	100						SSA		
13	BIN	R	100						SSA		

[REDACTED]

[REDACTED]

20 BIN R 100

[REDACTED]

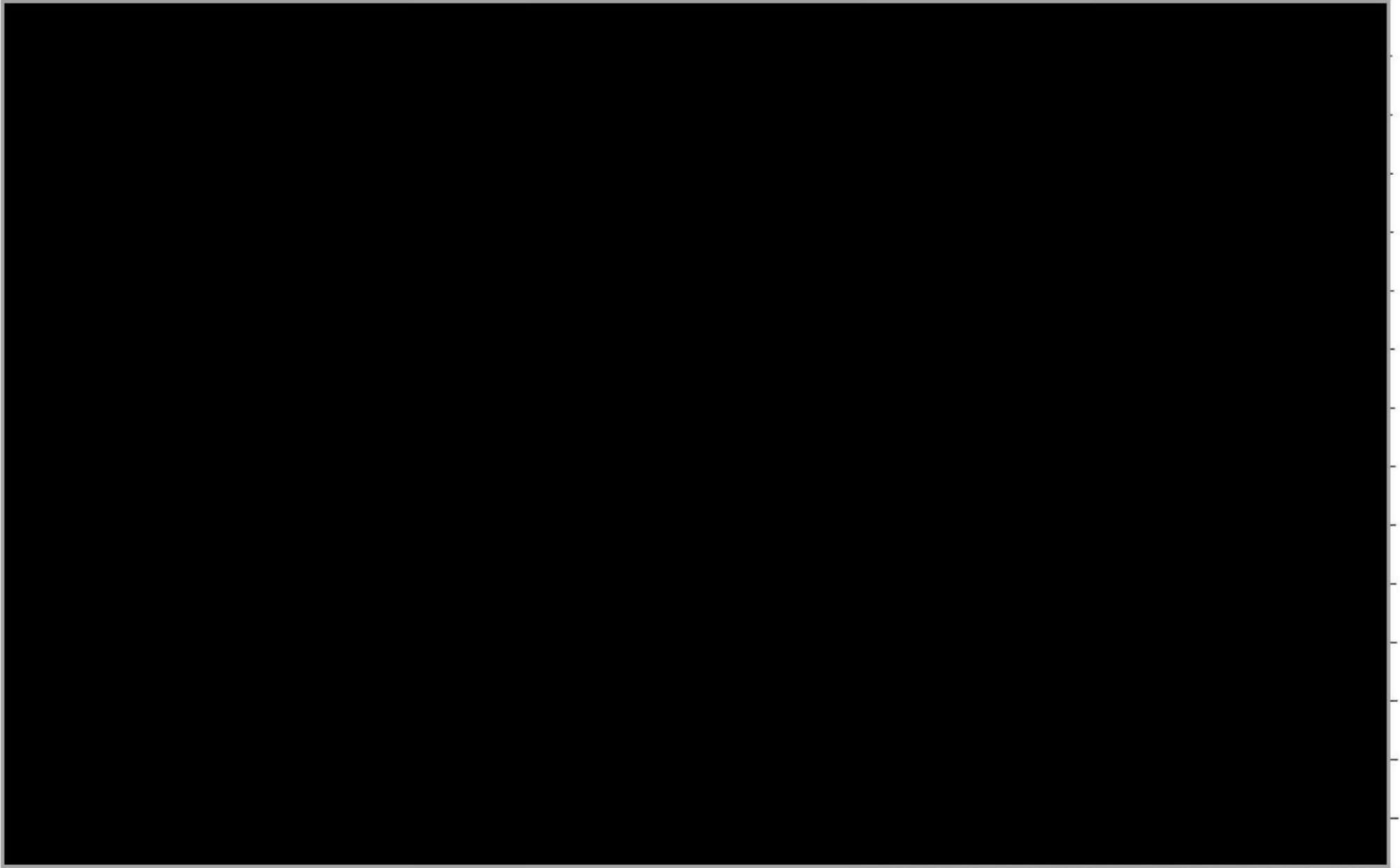
[REDACTED]

FL

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

51 BIN R 100 [REDACTED] [REDACTED] SSA

[REDACTED]