



# Industry & Local 338 Pension Plan

**July 1, 2021 PPA Certification and Actuarial Update**  
**July 22, 2021**

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Atlanta ■ Cleveland ■ Denver ■ Irvine ■ Los Angeles  
Miami ■ San Diego ■ San Francisco ■ Washington, D.C.

# Today's Discussion

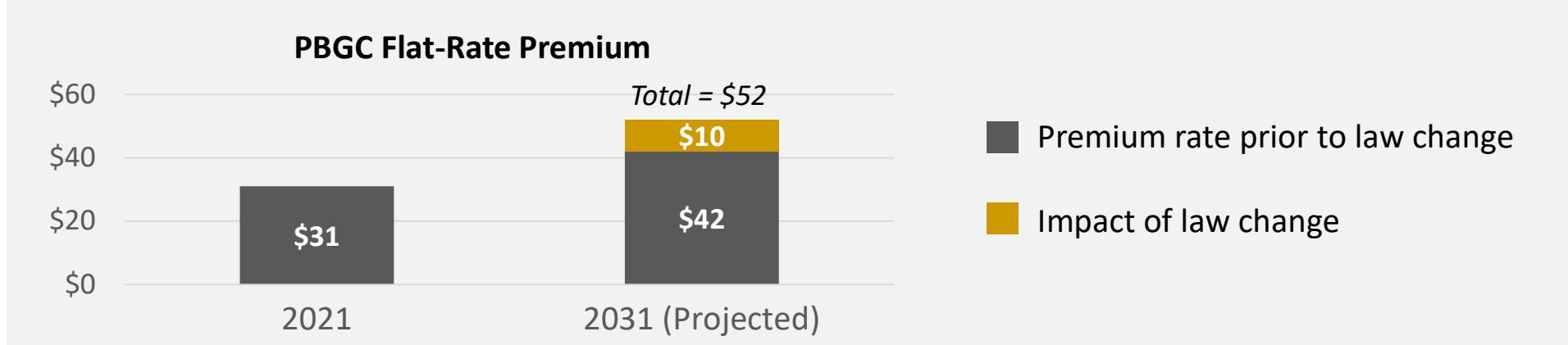
- **American Rescue Plan Act of 2021**
  - Funding Relief Provisions
- **Preliminary Discussion: July 1, 2021 – June 30, 2022 Certification**
- **Funding Projections**
- **Appendix**
  - Contribution Rate Summaries
  - Plan History Under PPA
  - Data, Assumptions, Methods, and Plan Provisions

# American Rescue Plan Act of 2021

# PBGC Premium Increase

## PBGC Premium Rates Increasing to \$52 Per-Participant in 2031

*This change is projected to increase premium rates by roughly \$10 in 2031*

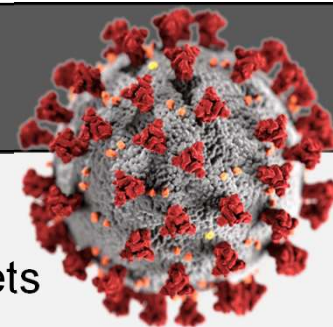


- In 2031, the PBGC Premium increase is expected to increase the Plan's annual operating expenses by about \$9,000 or 2% of total operating expenses.
  - 90 cents per week, assuming 10,000 weeks worked

# ARPA Funding Relief Provisions

## Spread COVID-19 Losses Over Longer Time Period

*Trustees may elect alternative funding standard account rules*



- Eligible investment losses can be smoothed over a 10-year period
  - Asset valuation corridor can be increased to 130% of market value of assets
  - Eligible investment/other COVID-19 losses can be amortized for up to 29 years
  - Applies to losses incurred during the first two plan years ending after February 29, 2020
  - Conditions: Must meet solvency test; subject to a temporary benefit increase restriction
- 
- **Investment Return on Market Value**
    - 7/1/2019 – 6/30/2020 = 1.82% (Audit)
    - 7/1/2020 – 6/30/2021 = 25.9% (SEI PYTD)
  - **Other COVID-19 losses**
    - Hours 7/1/2019 – 6/30/2020 15.6% lower than prior plan year
      - A portion of the decline is due to the withdrawal of Culinart and the College of New Rochelle
    - Hours 7/1/2020 – 6/30/2021: not yet known

# 2021 PPA Zone Status Certification - Preliminary Discussion

# 2021 PPA Certification

- **Certification must be submitted by the 90th day of the Plan Year**
  - September 28, 2021
  - Expect to certify “Green” zone for the July 1, 2021 – June 30, 2022 Plan Year
- **Preliminary Assets**
  - 25.9% return on assets for the plan year ending June 30, 2021
    - Estimated year-to-date return on investments provided by SEI
- **Projected Liabilities**
  - Based on results of the July 1, 2020 actuarial valuation
  - Plan changes known at the time of certification should be reflected

# 2021 PPA Certification (continued)

- **Projected Contributions:**

- Contribution Rates

- Only rate increases already included in CBAs as of the certification date are recognized

- Industry Activity Assumption

- PPA requires that the actuary's annual certification of the zone status of a multiemployer plan reflects industry activity assumptions that are based on input from the Trustees, provided in good faith
    - The industry activity assumption is very important, as it directly affects the level of the contributions expected in future years
    - Assumption is often based on prior year's work levels or contributions

# 2021 PPA Certification: Industry Activity

| Plan Year             | Active Count               | Average Weeks / Active |            | Total Weeks                                  | Average Ultimate Contribution Rate |
|-----------------------|----------------------------|------------------------|------------|----------------------------------------------|------------------------------------|
|                       |                            | Total Wks              | Active Wks |                                              |                                    |
| 7/1/2021 – 6/30/2022+ | ?                          |                        | ?          | ?                                            | ?                                  |
| 7/1/2020 – 6/30/2021  | 11-month average= 205      |                        | ?          | 10,045 for 205 actives working 49 weeks / yr | ?                                  |
| 7/1/2019 – 6/30/2020  | 204                        | 51.2                   | 48.01      | 10,240                                       | \$302.62                           |
| 7/1/2018 – 6/30/2019  | 226<br>CNR=17              | 54.7                   | 48.4       | 12,366                                       | 274.36                             |
| 7/1/2017 – 6/30/2018  | 238<br>CNR=20, Culinart=21 | 51.9                   | 47.7       | 12,351                                       | 261.20                             |
| 7/1/2016 – 6/30/2017  | 238<br>CNR=13, Culinart=19 | 50.6                   | 49.3       | 11,740                                       | 249.60                             |
| 7/1/2015 – 6/30/2016  | 243                        | 48.5                   | 47.5       | 11,775                                       | 232.00                             |
| 7/1/2014 – 6/30/2015  | 265                        | 50.2                   | 47.5       | 13,303                                       | 215.20                             |
| 7/1/2013 – 6/30/2014  | 306                        | 51.3                   | N/A        | 15,698                                       | 223.20                             |
| 7/1/2012 – 6/30/2013  | 326                        | 49.9                   | N/A        | 16,267                                       | 206.80                             |
| 7/1/2011 – 6/30/2012  | 382                        | 51.2                   | N/A        | 19,558                                       | 177.60                             |
| 7/1/2010 – 6/30/2011  | 412                        | 50.6                   | N/A        | 20,847                                       | ?                                  |

Historical contribution information for plan years prior to 7/1/2015 – 6/30/2016 obtained from prior years' actuarial valuation reports.

# Funding Projections

# Projection Assumptions and Methods

- **Unless otherwise stated, the projection assumptions, methods, data and plan provisions used are the same as those used for the Preliminary July 1, 2020 actuarial valuation.**
  - No future expected gains or losses other than those attributable to investment returns, as applicable.
- **Investment Earnings**
  - 25.9% return on assets for the plan year ending June 30, 2021
    - Estimated year-to-date return on investments provided by SEI
  - 7.25% per year, net of investment-related expenses, thereafter unless otherwise noted
- **Operating Expenses**
  - \$375,000 for the plan year beginning July 1, 2020, increasing 2.5% per year

Other assumptions may be reasonable and could produce different results. Other risks can negatively impact the funded status of the plan such as participants living longer than assumed. Additional scenarios available upon request.

# Projection Assumptions and Methods (cont.)

## ■ Work Levels

- Plan year beginning July 1, 2021 = 10,000 total weeks

## ■ Contribution Rates

- All contributions rate increases are benefit-bearing
- Contracts adopted on or after October 15, 2019 must comply with the Plan's Funding Policy, requiring contribution rate increases as follows:

### ***First 10 Years of Contribution Rate Increases***

|        |                  |         |                   |
|--------|------------------|---------|-------------------|
| Year 1 | \$ 8.76 per week | Year 6  | \$ 10.16 per week |
| Year 2 | \$ 9.02 per week | Year 7  | \$ 10.46 per week |
| Year 3 | \$ 9.29 per week | Year 8  | \$ 10.77 per week |
| Year 4 | \$ 9.57 per week | Year 9  | \$ 11.10 per week |
| Year 5 | \$ 9.86 per week | Year 10 | \$ 11.43 per week |

Contribution rate requirements for Year 11 and beyond will be provided by the Trustees.

Other assumptions may be reasonable and could produce different results. Other risks can negatively impact the funded status of the plan such as participants living longer than assumed. Additional scenarios available upon request.

# Projection Assumptions and Methods (cont.)

## ■ Contracts

- 55% of hours worked under contracts beginning that are expected to renew in PYB 2020
  - HP Hood, expired October 31, 2020
  - Montefiore New Rochelle, expired November 5, 2020
  - Paraco, expired January 31, 2021, renewed as of February 1, 2021
- 31% of hours worked under contracts that are expected to renew in PYB 2021
  - FrieslandCampina, expires December 31, 2021
- 14% of hours worked under contracts beginning that are expected to renew in PYB 2022
  - LP Transport, expires August 15, 2022
- All assumed to timely renew with contribution increases required by the Funding Policy

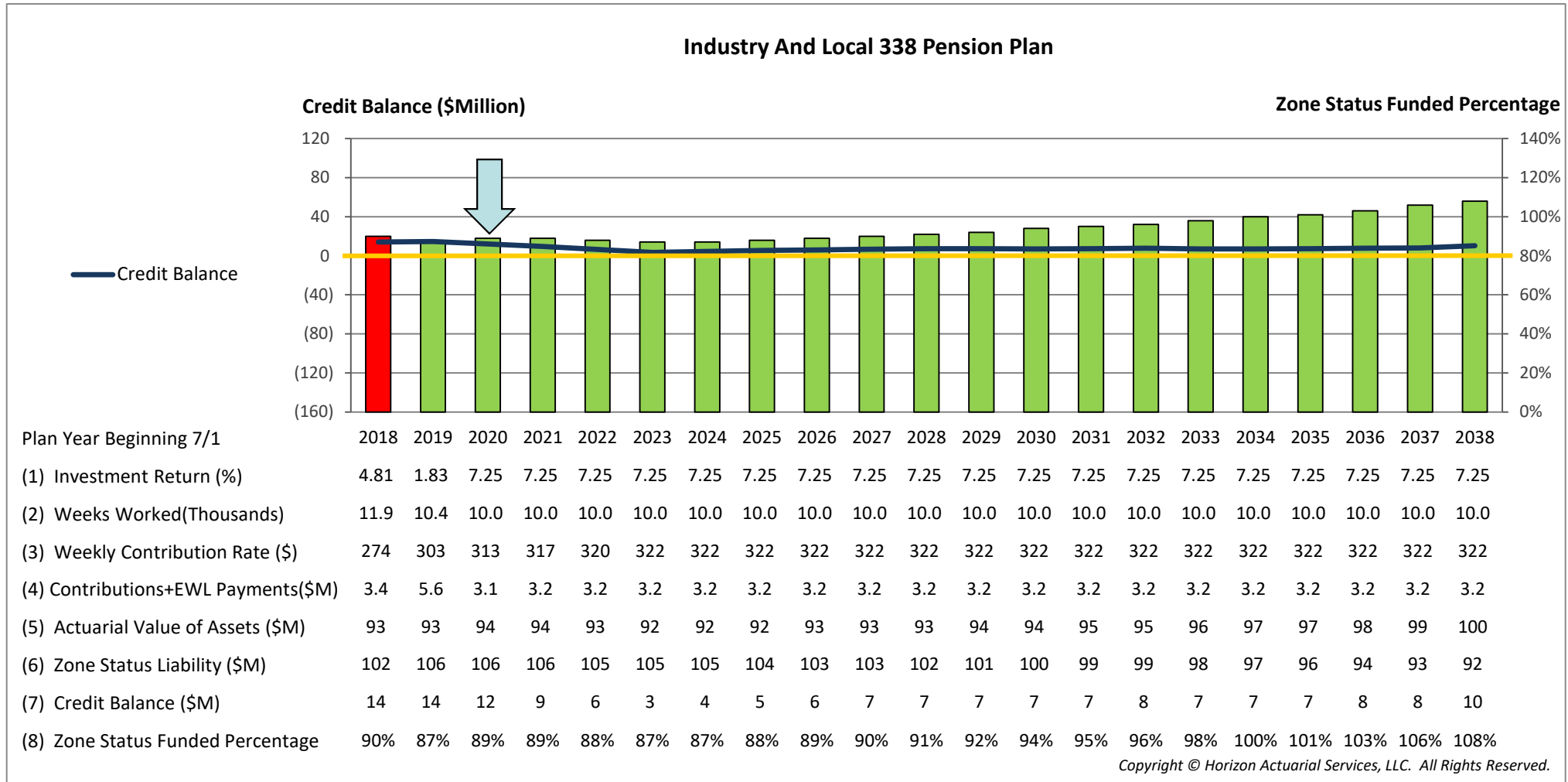
Other assumptions may be reasonable and could produce different results. Other risks can negatively impact the funded status of the plan such as participants living longer than assumed. Additional scenarios available upon request.

# Projection Roadmap

| Scenario                                                                                                                              | Valuation<br>Discount Rate<br>2021+ | Investment<br>Return<br>PYB 2020 /<br>PYB 2021+ | Weeks Worked<br>PYB 2020+ | Zone Status<br>2038-2039 | FSA Balance<br>6/30/2039 | % Funded<br>7/1/2038 | Weekly<br>Contrib Rate<br>7/1/2038 |
|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------------------|---------------------------|--------------------------|--------------------------|----------------------|------------------------------------|
| Certification Basis: Contribution Rates Included in Current Collective Bargaining Agreements                                          |                                     |                                                 |                           |                          |                          |                      |                                    |
| 1<br>Baseline<br>July 1, 2020 Valuation                                                                                               | 7.25%                               | 7.25% / 7.25%                                   | 10,000                    | Green                    | \$10M                    | 108%                 | \$322                              |
| 1A<br>July 1, 2021<br>Preliminary Certification                                                                                       | 7.25%                               | 25.9% / 7.25%                                   | 10,000                    | Green                    | \$67M                    | 166%                 | \$322                              |
| 1B<br>Low ROA PYE 2022                                                                                                                | 7.25%                               | 25.9% 2021<br>-13.00% 2022<br>7.25% thereafter  | 10,000                    | Red                      | \$(1)M                   | 96%                  | \$322                              |
| 1C<br>Alternative Discount<br>Rate                                                                                                    | 7.00%                               | 25.9% / 7.00%                                   | 10,000                    | Green                    | \$55M                    | 153%                 | \$322                              |
| Funding Policy: All Collective Bargaining Agreements Contribution Rate Increases Required by the Funding Policy Adopted October, 2019 |                                     |                                                 |                           |                          |                          |                      |                                    |
| 2A<br>July 1, 2021<br>Preliminary Certification<br>Funding Policy                                                                     | 7.25%                               | 25.9% / 7.25%                                   | 10,000                    | Green                    | \$86M                    | 178%                 | \$524                              |
| 2B<br>Low ROA PYE 2022<br>Funding Policy                                                                                              | 7.25%                               | 25.9% 2021<br>-13.00% 2022<br>7.25% thereafter  | 10,000                    | Green                    | \$18M                    | 113%                 | \$524                              |
| 2C<br>Alt. Discount Rate<br>Funding Policy                                                                                            | 7.00%                               | 25.9% / 7.00%                                   | 10,000                    | Green                    | \$73M                    | 165%                 | \$524                              |

# Scenario 1: 2020 Baseline – Certification Basis

7.25% Return PYB 2020+ | 10.0 Thousand Weeks Worked beginning PYB 2020

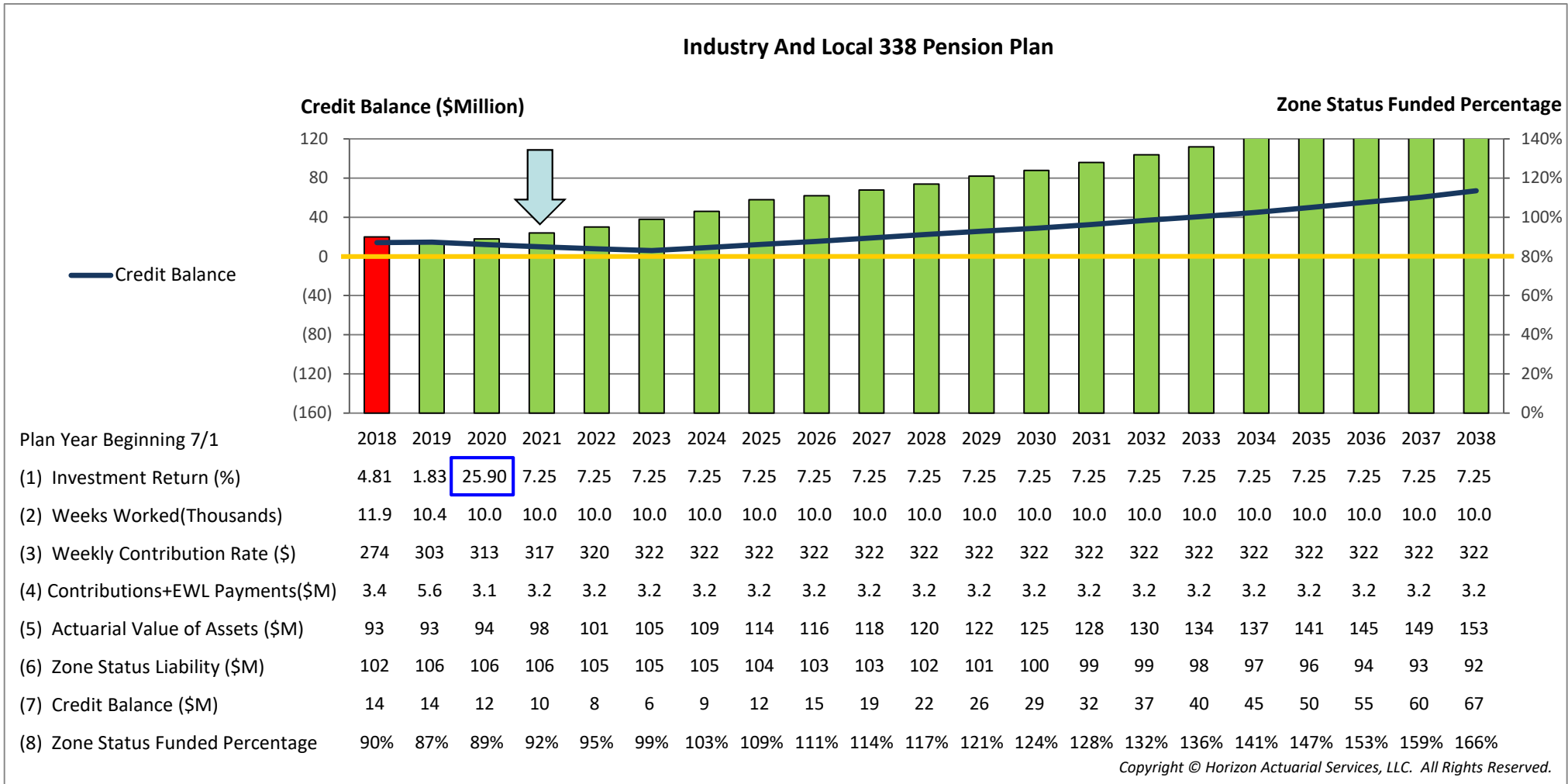


## Notes

- 1) Effective July 1, 2016, all contributions (and future rate increases, if any) are benefit-bearing. See graph for detail regarding assumed rate increases.
- 2) Benefit changes made by the RP are reflected beginning in the July 1, 2018 plan year.

# Scenario 1A: Preliminary 2021 – Certification Basis

25.90% Return PYB 2020; 7.25% Return PYB 2021+ | 10.0 Thousand Weeks Worked beginning PYB 2020

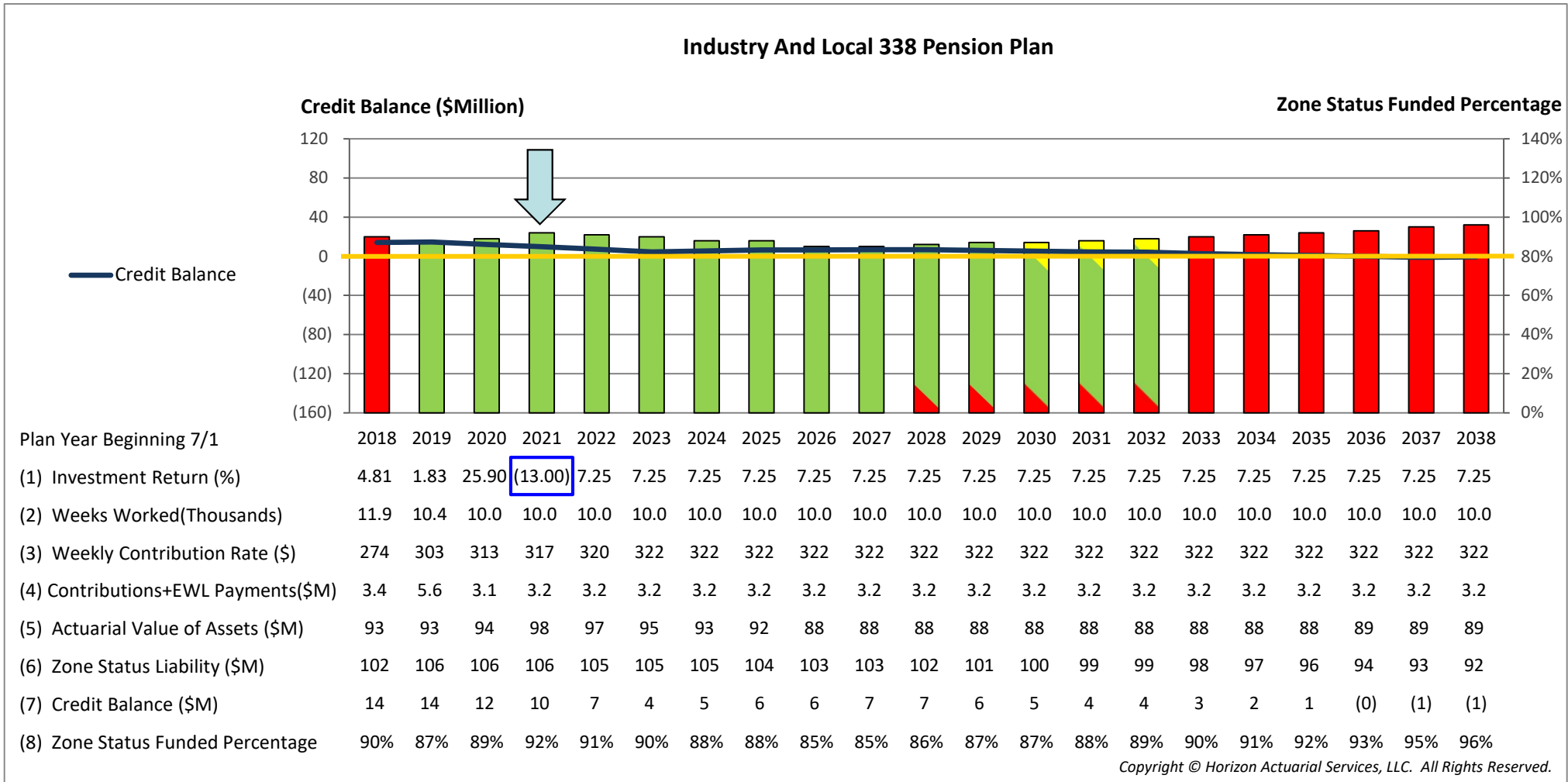


## Notes

- Effective July 1, 2016, all contributions (and future rate increases, if any) are benefit-bearing. See graph for detail regarding assumed rate increases.
- Benefit changes made by the RP are reflected beginning in the July 1, 2018 plan year.

# Scenario 1B: One-Year Low Return – Certification Basis

25.90% Return PYB 2020; -13.00% Return PYB 2021; 7.25% Return PYB 2022+ | 10.0 Thousand Weeks Worked beginning PYB 2020



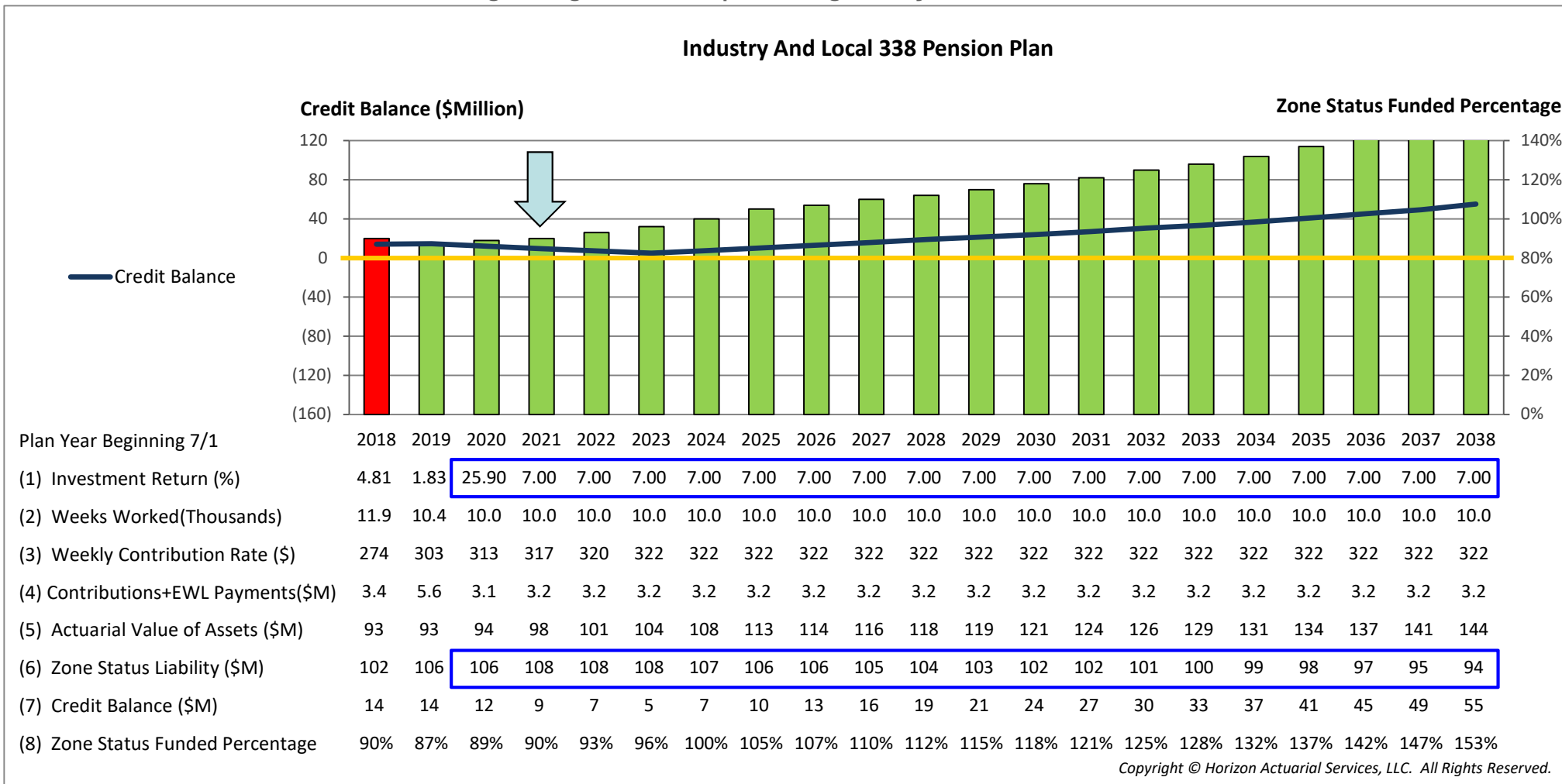
## Notes

- 1) Effective July 1, 2016, all contributions (and future rate increases, if any) are benefit-bearing. See graph for detail regarding assumed rate increases.
- 2) Benefit changes made by the RP are reflected beginning in the July 1, 2018 plan year.

# Scenario 1C: Alternative Discount Rate – Certification Basis

7.00% Discount Rate | 25.90% Return PYB 2020; 7.00% Return PYB 2021+ |

10.0 Thousand Weeks Worked beginning PYB 2020 | Funding Policy Contribution Increases

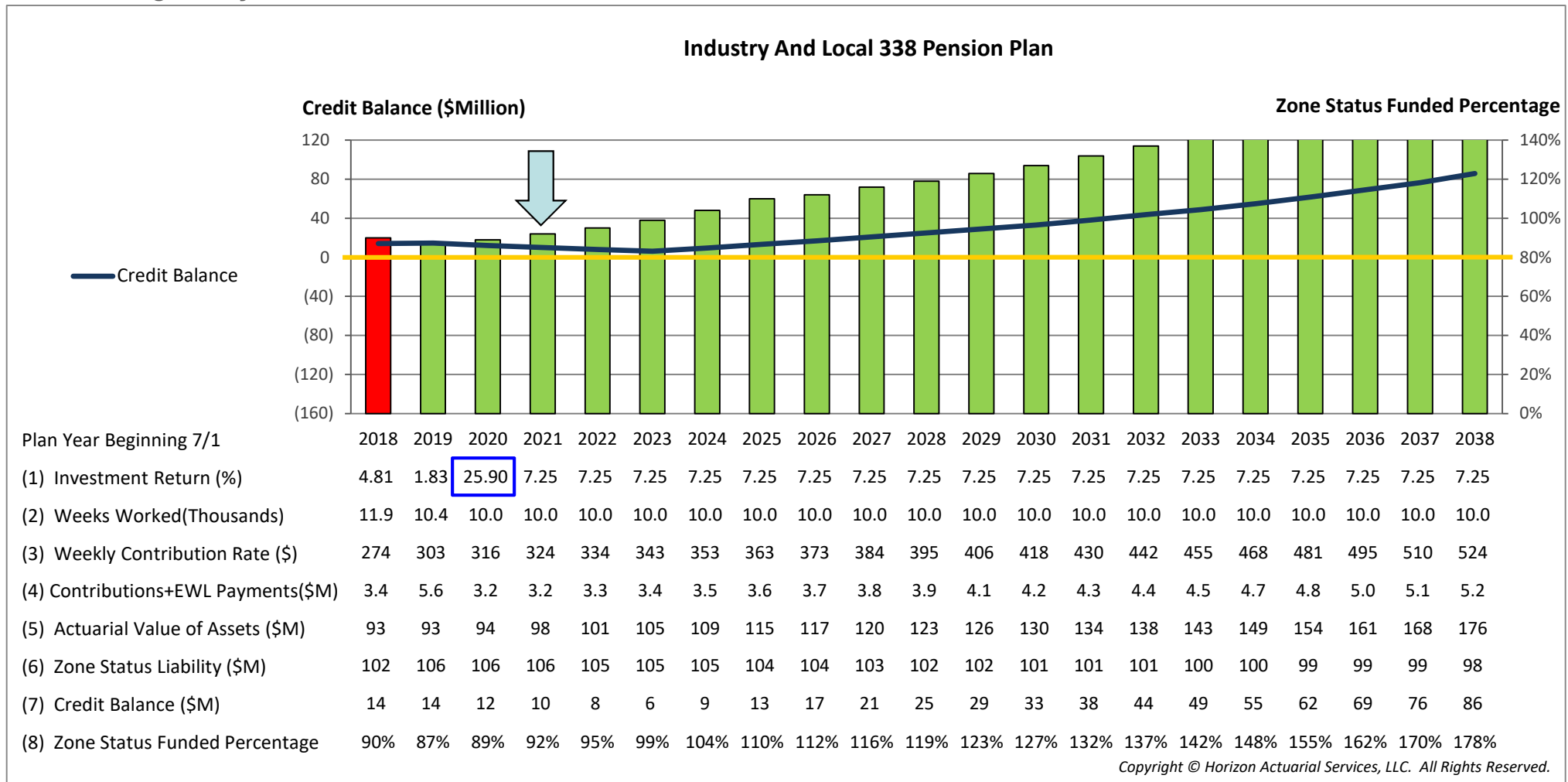


## Notes

- 1) Effective July 1, 2016, all contributions (and future rate increases, if any) are benefit-bearing. See graph for detail regarding assumed rate increases.
- 2) Benefit changes made by the RP are reflected beginning in the July 1, 2018 plan year.

# Scenario 2A: Preliminary 2021 – Funding Policy

25.90% Return PYB 2020; 7.25% Return PYB 2021+ | 10.0 Thousand Weeks Worked beginning PYB 2020 | Funding Policy Contribution Increases

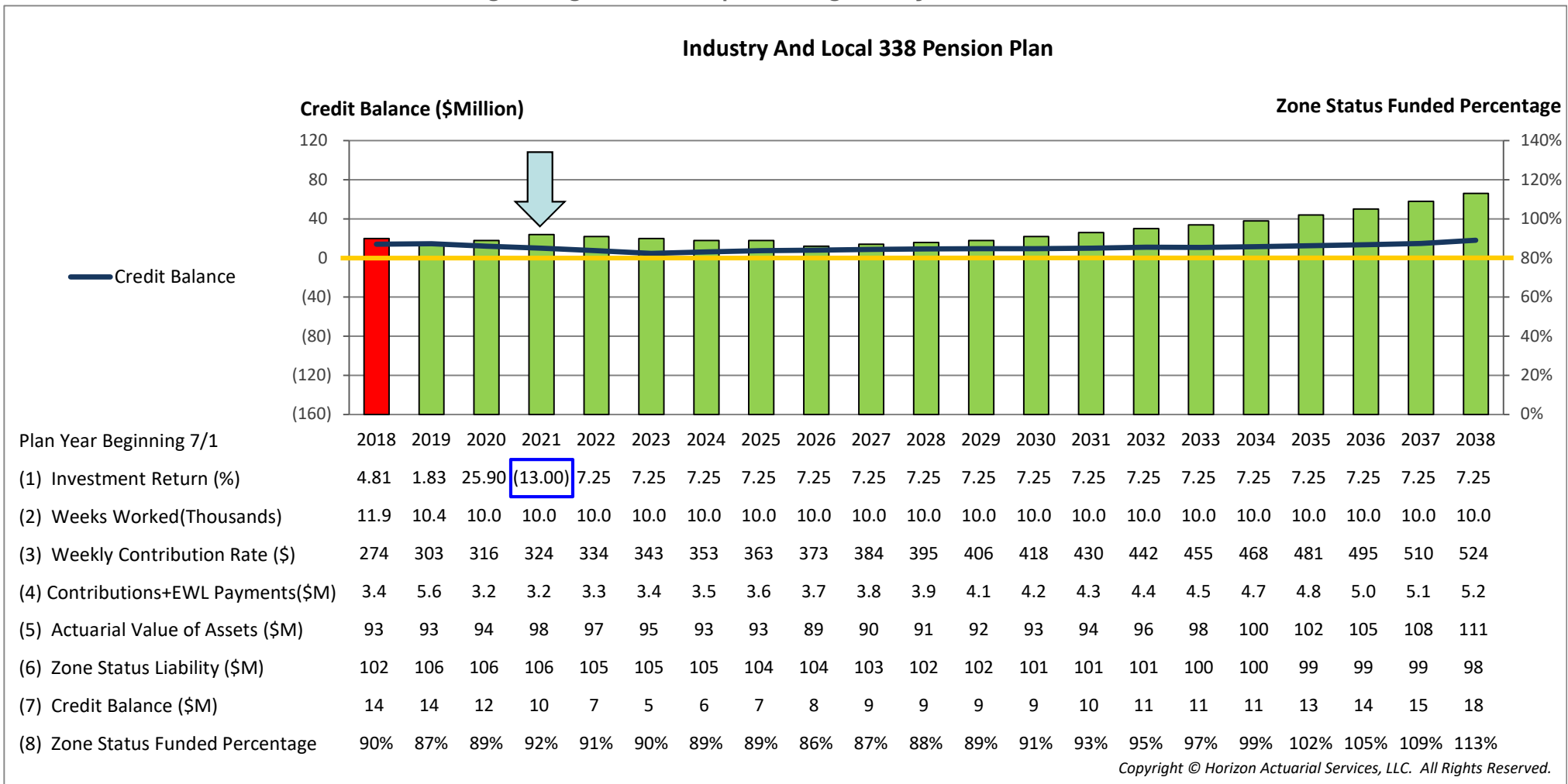


## Notes

- 1) Effective July 1, 2016, all contributions (and future rate increases, if any) are benefit-bearing. See graph for detail regarding assumed rate increases.
- 2) Benefit changes made by the RP are reflected beginning in the July 1, 2018 plan year.

# Scenario 2B: One-Year Low Return – Funding Policy

7.25% Discount Rate | 25.90% Return PYB 2020; **-13.00% Return PYB 2021**; 7.25% Return PYB 2022+ |  
10.0 Thousand Weeks Worked beginning PYB 2020 | Funding Policy Contribution Increases

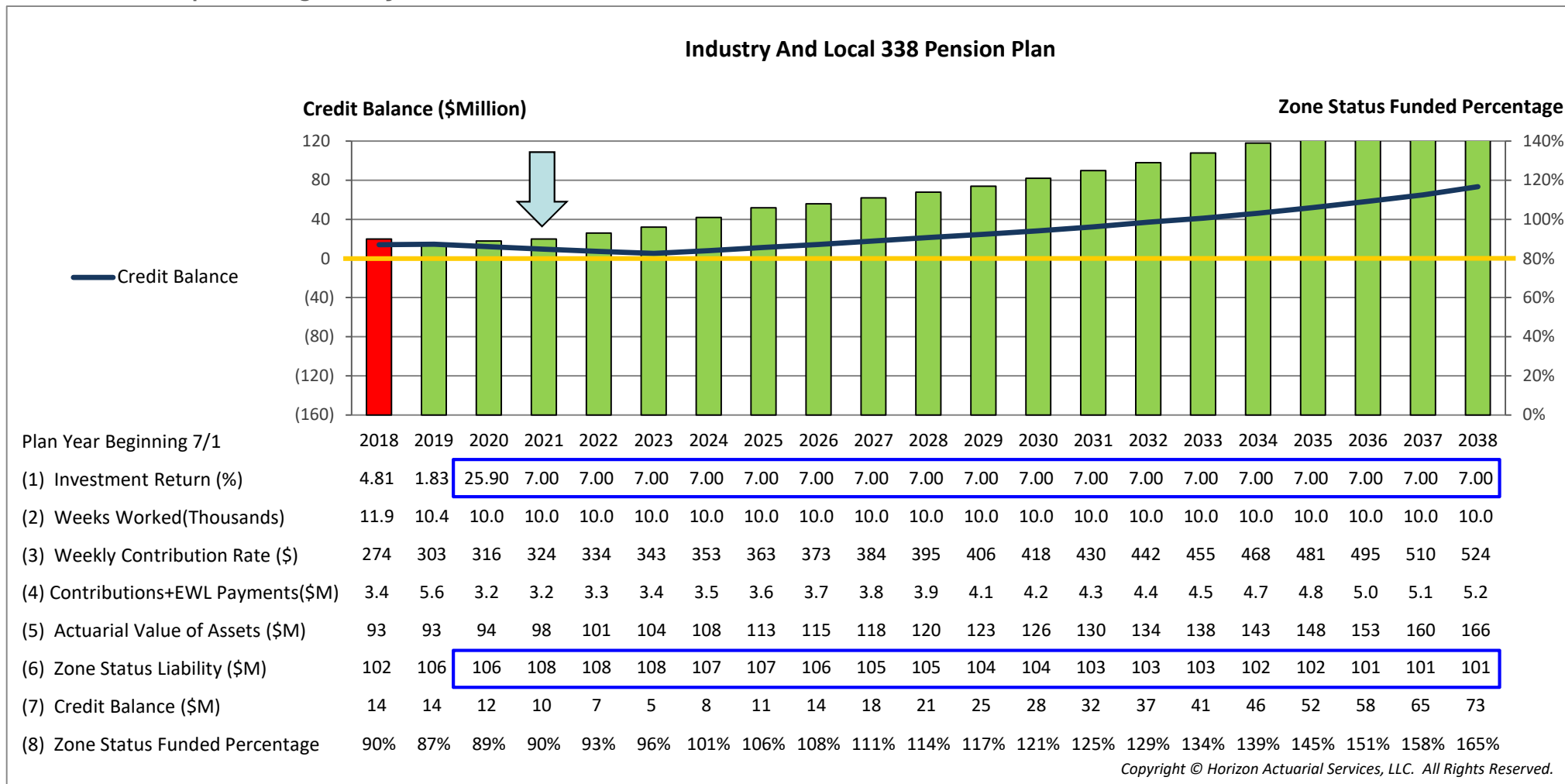


## Notes

- 1) Effective July 1, 2016, all contributions (and future rate increases, if any) are benefit-bearing. See graph for detail regarding assumed rate increases.
- 2) Benefit changes made by the RP are reflected beginning in the July 1, 2018 plan year.

# Scenario 2C: Alternative Discount Rate – Funding Policy

7.00% Discount Rate | 25.90% Return PYB 2020; 7.00% Return PYB 2021+ | 10.0 Thousand Weeks Worked beginning PYB 2020 | Funding Policy Contribution Increases



## Notes

- 1) Effective July 1, 2016, all contributions (and future rate increases, if any) are benefit-bearing. See graph for detail regarding assumed rate increases.
- 2) Benefit changes made by the RP are reflected beginning in the July 1, 2018 plan year.

# Forecast Observations

- **The Plan remains sensitive to both investment return and contributions**
- **Long term funding improvement is compromised if investment returns are less than assumed or contribution levels fall**
  - Even with a better than expected return for the current year the plan remains sensitive to investment returns
  - Investment professionals are generally reporting lower expectations for investment returns, particularly in the short term
    - We continue to monitor movements in the outlook for future investment returns reported by investment professionals
  - The Funding Policy helps mitigate some of the risk
- **Impact of ARPA**
  - PBGC Premiums: projected to increase by roughly \$9,000 per year starting in 2031
  - Funding Relief
    - Funding Relief may be adopted by the plan to temporarily increase the credit balance
    - Benefit restrictions apply to plans that adopt relief
  - Special Financial Assistance is unlikely. Any possible relief will be based on future PBGC guidance and plan experience

# 2021 – 2022 Plan Year Timeline – PPA

| Event                                                                                         | Deadline / Information                                                                                                                                              | Latest Date |
|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| <b>Actuarial Certification</b>                                                                | 90 days into plan year                                                                                                                                              | 9/28/2021   |
| <b>Notice of Critical Status<br/>(if applicable)</b>                                          | 30 days after actuarial certification                                                                                                                               | N/A         |
| <b>Develop Funding Improvement Plan (FIP) or Rehabilitation Plan (RP)<br/>(if applicable)</b> | Due 240 days after certification of endangered (FIP) or critical status (RP)                                                                                        | N/A         |
| <b>Funding Improvement or Rehabilitation Period<br/>(if applicable)</b>                       | After expiration of contracts covering at least 75% of active participants, not later than first of plan year following second anniversary of adoption of FIP or RP | N/A         |

# 2021 – 2022 Plan Year – Other Actuarial Information

| Event                                         | Deadline / Information                                                                                     | Latest Date                                 |
|-----------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| <b><i>Annual Funding Notice</i></b>           | 120 days after the end of the plan year                                                                    | 10/28/2021                                  |
| <b><i>Schedule MB (Form 5500)</i></b>         | Last day of the 7 <sup>th</sup> month following the end of the Plan Year<br>(2½ month extension available) | 1/31/2022 (w/o ext)<br>4/15/2022 (with ext) |
| <b><i>ERISA 104(d) Notice</i></b>             | 30 days after due date Form 5500 filing                                                                    | 3/1/2022 (w/o ext)<br>5/15/2022 (with ext)  |
| <b><i>PBGC Premium Filing</i></b>             | 15 <sup>th</sup> day of the 10 <sup>th</sup> full calendar month in the Plan Year                          | 4/15/2022                                   |
| <b><i>Actuarial Valuation</i></b>             |                                                                                                            | N/A                                         |
| <b><i>Review of Actuarial Assumptions</i></b> | In conjunction with the actuarial valuation                                                                | N/A                                         |

# Appendix

# Contribution Rate Summary

| Employer                | Contract Expiration Date | As of 7/1/2018           |                         | As of 7/1/2019           |                         | As of 7/1/2020           |                         |
|-------------------------|--------------------------|--------------------------|-------------------------|--------------------------|-------------------------|--------------------------|-------------------------|
|                         |                          | Active Count (Valn Data) | Total Wkly Contrib Rate | Active Count (Valn Data) | Total Wkly Contrib Rate | Active Count (Valn Data) | Total Wkly Contrib Rate |
| College of New Rochelle | 8/31/2013                | 17                       | \$ 208.95               | 17                       | \$ 269.04               | 0                        | \$ 269.04               |
| HP Hood / Crowley       | 10/31/2020               | 92                       | 303.98                  | 91                       | 322.98                  | 91                       | 342.58                  |
| Culinart                | 12/31/2016               | 20                       | 267.15                  | 0                        | 267.15                  | 0                        | 267.15                  |
| Freisland Campina       | 12/31/2021               | 59                       | 247.60                  | 65                       | 242.64                  | 62                       | 261.33                  |
| LP Transport            | 8/15/2022                | 29                       | 322.75                  | 32                       | 322.75                  | 29                       | 331.51                  |
| Montefiore New Rochelle | 11/5/2020                | 12                       | 251.61                  | 13                       | 270.30                  | 13                       | 290.21                  |
| Paraco Gas              | 1/31/2025                | 8                        | 245.15                  | 7                        | 263.84                  | 8                        | 283.75                  |
| Westchester L860        | 9/30/2013                | 1                        | 243.28                  | 1                        | 243.28                  | 1                        | 243.28                  |
| Total                   |                          | 238                      |                         | 226                      |                         | 204                      |                         |

## Notes

- 1) All contributions are benefit-bearing, effective beginning July 1, 2016.
- 2) Contribution rates shown above are as reported by Plan Administrator.
- 3) Contribution rates as of 7/1/2018 include surcharges for College of New Rochelle, Culinart, Friesland Campina, Westchester L 860

# Historical Contribution Rates by Contract

| Employer                | Base Rate | As of Plan Year Ending |           |           |           |           |           |           |           |           |        |
|-------------------------|-----------|------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------|
|                         |           | 2011                   | 2012      | 2013      | 2014      | 2015      | 2016      | 2017      | 2018      | 2019      | 2020   |
| College of New Rochelle | \$ 110.44 | \$ 143.60              | \$ 158.00 | \$ 174.00 | \$ 174.00 | \$ 174.00 | \$ 174.00 | \$ 174.00 | \$ 208.95 | \$ 269.04 | N/A    |
| HP Hood / Crowley       | 130.00    | 169.00                 | 186.34    | 204.97    | 225.47    | 248.00    | 272.79    | 286.43    | 303.98    | 322.67    | 342.58 |
| Culinart                | 108.44    | 141.08                 | 154.98    | 170.48    | 187.53    | 206.28    | 226.91    | 226.91    | 267.15    | 267.15    | N/A    |
| Friesland Campina       | 100.12    | 133.25                 | 146.57    | 161.23    | 177.35    | 195.09    | 205.09    | 215.09    | 247.60    | 242.64    | 261.33 |
| LP Transport            | 160.00    | 176.00                 | 192.00    | 208.00    | 228.80    | 251.60    | 276.80    | 290.80    | 322.75    | 322.75    | 331.51 |
| Montefiore New Rochelle | 120.12    | 159.86                 | 175.85    | 193.44    | 212.78    | 234.06    | 234.06    | 234.06    | 251.61    | 270.30    | 290.21 |
| Paraco Gas              | 124.00    | 148.00                 | 156.00    | 172.00    | 188.00    | 206.80    | 227.60    | 227.60    | 245.15    | 263.84    | 283.75 |
| Westchester L860        | 130.15    | 169.59                 | 186.55    | 205.21    | 205.21    | 205.21    | 205.21    | 205.21    | 243.28    | 243.28    | 243.28 |

## Notes

- 1) Effective July 1, 2016, all contributions (and future rate increases, if any) are benefit-bearing.
- 2) Contribution rates for 2018 include surcharges for College of New Rochelle, Culinart, Friesland Campina, Westchester L 860

# Plan History Under PPA

| Plan Year Begins                                 | Contribution Requirements                                                                                                                                                                                                                                                                                                 | Benefit Changes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7/1/2008 - 7/1/2009<br><b>Green</b>              | <b>7/1/2009 supplemental contribution requirement</b> <ul style="list-style-type: none"> <li>Contrib increase requirements were updated periodically</li> </ul>                                                                                                                                                           | <b>7/1/2009 supplemental contribution requirement</b> <ul style="list-style-type: none"> <li>Supplemental contributions were not benefit bearing</li> </ul>                                                                                                                                                                                                                                                                                                                                             |
| 7/1/2010 - 7/1/2015<br><b>Green</b>              | N/A                                                                                                                                                                                                                                                                                                                       | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 7/1/2016<br><b>Yellow, Proj Red w/in 5 years</b> | <b>Funding Improvement Plan (FIP), adopted 5/22/2017</b> <ul style="list-style-type: none"> <li>Flat dollar schedule of contribution increases</li> <li>Rehabilitation Plan was adopted before any contract was required to include the terms of the FIP</li> </ul>                                                       | <b>Amendment Effective 7/1/2016</b> <ul style="list-style-type: none"> <li>Benefit accruals are 0.9% of contributions</li> <li>All contributions are benefit bearing</li> </ul>                                                                                                                                                                                                                                                                                                                         |
| 7/1/2017<br><b>Red</b>                           | <b>Rehabilitation Plan (RP), adopted 9/18/2017</b> <ul style="list-style-type: none"> <li>Flat dollar schedule of contribution increases equivalent to 6.5% of the average contribution rate in effect July 1, 2017</li> <li>Surcharges and the default schedule were imposed on open contracts after 180 days</li> </ul> | <b>Adjustable Benefits eliminated, effective 1/1/2018</b> <ul style="list-style-type: none"> <li>Ancillary Benefits</li> <li>Death Benefit for Single Participants</li> <li>Disability</li> <li>Normal Form of Payment</li> <li>Single Participants: 120 Payments Guaranteed</li> <li>Married Participants: 75% Joint and Survivor (with 120 Payments Guaranteed)</li> <li>Early Retirement Subsidies</li> <li>Age 55 and 15 Years of Service</li> <li>Service Pension: 20, 25, 30, 35 Years</li> </ul> |
| 7/1/2018<br><b>Red</b>                           | N/A                                                                                                                                                                                                                                                                                                                       | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 7/1/2019 - 7/1/2020<br><b>Green</b>              | <b>Funding Policy, adopted 10/15/2019</b> <ul style="list-style-type: none"> <li>Flat dollar schedule of contribution increases equivalent to 3.0% of the average contribution rate in effect July 1, 2017</li> </ul>                                                                                                     | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

# Data, Assumptions, Methods, and Plan Provisions

- Please see our January 5, 2021 presentation

# Actuarial Certification

We have prepared this actuarial report for use by the **Industry & Local 338 Pension Plan** (the “Plan”). This report has been prepared solely for the benefit of the Plan, and it is not complete without the accompanying discussion with a representative of Horizon Actuarial Services, LLC. This report should not be distributed to others not affiliated with the Plan or relied upon by any other person without prior written consent from Horizon Actuarial Services, LLC.

In preparing this report, we have relied on all the information and data provided by the Plan, including plan provisions and asset information, as being complete and accurate. We have not independently verified the accuracy or completeness of the data or information provided, but we have reviewed the data for reasonableness to the extent that we believe appropriate based on the purpose for which it has been used.

The valuation summarized in this report involves actuarial calculations that require assumptions about future events. These calculations are performed using actuarial models, the intended purpose of which is the estimation and projection of the Plan’s liabilities and assets, zone status, and other related information summarized herein. We believe that the assumptions and methods used in this report are reasonable individually and in the aggregate, and are appropriate for the purposes for which they have been used. However, other assumptions and methods could also be reasonable and could generate materially different results. We have relied on the input of experts in developing certain assumptions, such as mortality and the valuation interest rate. Because it is not possible or practical to model all aspects of a situation, we may use summary information, estimates, or simplifications of calculations to facilitate the modeling of future events. We may also exclude factors or data that are immaterial in our judgment.

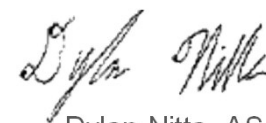
We have not performed a detailed analysis of the potential effects of risk on the Plan’s future financial condition, but have included a discussion of some risks that may significantly affect the Plan. A more detailed assessment of the risks could provide the Trustees with a better understanding of the risks inherent in the Plan and may include additional scenario testing, sensitivity testing, stress testing and stochastic modeling.

Future events and actual experience will vary from any assumptions we have used, and calculations prepared with actual data will vary from estimates or summaries used for modeling purposes. Actual future results will differ from our projections. As these differences arise, contributions and/or benefits may need to be adjusted to take these changes into account.

In our opinion, any methods, assumptions, and calculations are in accordance with the applicable provisions of the Internal Revenue Code and ERISA, and the procedures followed and presentation of results conform with generally accepted actuarial principles and practices. The undersigned consultants of Horizon Actuarial Services, LLC with actuarial credentials meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinions contained herein. There is no relationship between the Plan and Horizon Actuarial Services, LLC that affects our objectivity.



Mary Ann Dunleavy, ASA, EA, MAAA  
Senior Consulting Actuary



Dylan Nitta, ASA  
Actuary