

Have you evaluated retirement plan fees?

Here's a checklist to help you review fees.

As a retirement plan fiduciary, you need to act in the best interest of your plan participants and beneficiaries*—like evaluating the fees for the operation and management of the retirement plan. That also means determining if the costs of operating the plan are reasonable compared to the value you receive.

When assessing the plan, you'll want to ensure fees are appropriate for the plan's needs and in comparison to costs in the marketplace for similar services and value level. It's also important to take a look at all service providers for the plan—including their direct and indirect fees.

Keeping track of fees and disclosures is a big responsibility. Let's make it a little easier.

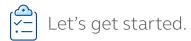
This checklist can help you:

- Evaluate if the retirement plan fees are reasonable for the services and value received
- Make sound decisions for the retirement plan and support good governance

During your review, keep these key factors in mind:

- Objectives of the plan
- Services received and service quality
- Reputation of the service provider
- Benefits of services to plan participants

Be sure to document and review on a regular basis.



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Reference of checklist is not an exhaustive list of what you should do. It and this communication are provided as education only with the understanding that Principal® is not rendering legal, accounting, investment, or tax advice. You should consult with appropriate counsel, financial professional or other advisors on all matters pertaining to legal, tax, investment, or accounting obligations and requirements.

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^{*}The Employee Retirement Income Security Act of 1974 (ERISA) requires retirement plan fiduciaries to act solely in the interests of, and for the exclusive benefit of, plan participants and beneficiaries.

Fee evaluation checklist

For each category, first indicate if the service is applicable to the plan. Then consider if the service adds value to your organization.

| Step 1 | : E | valı | uat | e plan 1 | fees and value of services |
|-------------------|--------|----------------|-------|---------------------------------|--|
| Basic serv | rice ı | need- | –is i | t valued? | Considerations for value and reasonableness of fees |
| Yes | • | No No | • | N/A N/A N/A N/A | Does the service provider help reduce administrative burdens for the plan by providing the following? • Administrative and recordkeeping services • Resources and tools for the plan (plan sponsor and participant websites, interface for data management and transactions, sample forms, communications, education materials, etc.) • Dedicated service team with proactive contact from those individuals • Business culture and platform that is easy to do business with |
| Yes Yes Yes | • | No No No | • | N/A N/A N/A N/A N/A | Does the service provider offer assistance with participant communication and education including any of the following? On-site meetings Effective alternatives to on-site meetings Marketing and communication materials Secure website and mobile access Call center |
| Yes | • | No | ٠ | N/A | Does the service provider deliver a disciplined framework (due diligence process) for the selection and monitoring of plan investment advisors and managers within their platform? |
| Yes | • | No | • | N/A | Do you receive services to support your investment fiduciary responsibilities [ERISA Sec. 3(16), 3(21), 3(38)]? |
| Yes Yes Yes | • | No No No | • | | Does the service provider offer assistance with government reporting, plan compliance, or audit services including any of the following? • Assistance with plan compliance nondiscrimination testing • Assistance with population and filing the Form 5500 • Assistance with plan document qualification filing • Assistance with drafting the plan document and summary plan description • Updates related to legislative and regulatory changes and an explanation of what that means for plan sponsors |
| Yes | 0 | No | • | N/A | Does the service provider take advantage of current technology? Is it available for plan sponsor and participant use? |
| Yes | ٠ | No | • | N/A | Does the service provider align with DOL cybersecurity best practices and offer customer protection guarantees? |

| Additional service need— is it valued? | Considerations for value and reasonableness of fees |
|--|--|
| Yes • No • N/A | Does the service provider deliver multiple service offerings (e.g., administrative, recordkeeping, investment management, plan design assistance, participant education, and custodial services) for a single fee? |
| Yes • No • N/A | Does the service provider have the ability to develop unique solutions to help meet the requirements of your retirement plan? |
| Yes • No • N/A | Does the service provider offer consulting services such as technical assistance relating to IRS and DOL regulations, benefit design and modeling, merger and acquisition assistance, and benchmarking information? |
| Yes • No • N/A | Is there complexity required in order to meet the plan's objectives? For example, does the plan have a complex design that may require special administrative or plan compliance testing services, or does the plan require complex or customized participant communication, education, or other services? Can the service provider handle the complexity? |
| Yes • No • N/A | Does the service provider have experience with retirement plans (e.g., years in the business, servicing similar retirement plans) and are you able to easily access information about their services and fees? |
| Yes • No • N/A | Does the service provider have the ability to help you with all of your retirement plan needs (e.g., defined benefit, defined contribution, non-qualified or employee stock ownership plans)? There may be efficiencies and cost savings by having multiple relationships with a single provider. |
| | |
| Understanding your fees— are they valued? | Considerations for value and reasonableness of fees |
| 0, | Considerations for value and reasonableness of fees Are the details of the fee structure clear enough to compare it with other service providers' fee structures—allowing you to fairly assess competitiveness? |
| are they valued? | Are the details of the fee structure clear enough to compare it with other service providers' fee |
| are they valued? Yes • No • N/A | Are the details of the fee structure clear enough to compare it with other service providers' fee structures—allowing you to fairly assess competitiveness? Are participant-level fees clearly outlined, such as fees for investment advice (e.g., managed accounts), plan loans, distributions, etc., allowing you to assess the reasonableness of those fees and the impact |
| are they valued? Yes • No • N/A Yes • No • N/A | Are the details of the fee structure clear enough to compare it with other service providers' fee structures—allowing you to fairly assess competitiveness? Are participant-level fees clearly outlined, such as fees for investment advice (e.g., managed accounts), plan loans, distributions, etc., allowing you to assess the reasonableness of those fees and the impact on your plan's total cost? Does the service provider have flexible options for the payment of plan fees? Have your options been explained to you and are the options of value to you? Plan sponsor pays Participant pays Fees paid from revenue sharing of one or more investment options |
| Yes • No • N/A Yes • No • N/A | Are the details of the fee structure clear enough to compare it with other service providers' fee structures—allowing you to fairly assess competitiveness? Are participant-level fees clearly outlined, such as fees for investment advice (e.g., managed accounts), plan loans, distributions, etc., allowing you to assess the reasonableness of those fees and the impact on your plan's total cost? Does the service provider have flexible options for the payment of plan fees? Have your options been explained to you and are the options of value to you? Plan sponsor pays Participant pays Fees paid from revenue sharing of one or more investment options Any combination of the above If the plan requires special services because of plan complexity, does this complexity increase the fees associated with the operation of the plan? Is the increased fee worth the value of receiving |

Additional items considered in the evaluation

Step 2: Review fees as part of retirement plan governance Date completed Duty The plan fiduciary or committee should review what services are needed for the plan on a regular basis— \bigcirc recordkeeping and administrative services, investment management, investment education or advice, participant education, legal, accounting, trustee/custodial, etc. The plan fiduciary or committee should receive periodic reports from all service providers engaged to provide services to the plan to: • Review their processes and effectiveness of the service provider's controls in place (e.g., SOC 1 0 • Evaluate their performance and reasonableness of fees for the services provided Each provider should be specific about which services are covered for the expected fees. The plan fiduciary or committee should understand the fees—direct and indirect—that are being 0 charged to the plan. The plan fiduciary or committee should review fees to ensure that only fees properly payable from plan 0 assets are paid with plan assets and that fees associated with settlor functions are not.* The plan fiduciary or committee should properly disclose fees to participants in accordance with the \bigcirc DOL participant disclosure requirements. *Settlor fees are related to the business activities of the employer and involve expenses an employer could reasonably be expected to incur in the

normal course of business, such as to establish, amend or terminate a plan—not fiduciary actions under the plan.

Reviewed by:

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You should consult with your own legal counsel as to the appropriateness of this sample document for your specific situation.