

Dear All,

On September 15, 2025, the IRS and Department of the Treasury issued final regulations under Section 603 of Secure 2.0, commonly referred to as the **Roth Catch-Up Contribution Rule**. While most retirement plans must implement this rule effective January 1, 2026, the regulations provide extended compliance timeframes for multi-employer plans subject to collective bargaining agreements such as the IAM National 401(k) Plan.

Key Highlights:

- Multi-employer plans with collective bargaining agreements in effect as of December 31, 2025, have until the taxable year following the expiration of the last applicable agreement (excluding extensions) to comply.
- Compliance cannot occur earlier than January 1, 2027.

The IAM National 401(k) Plan is currently reviewing these regulations to determine its effective compliance date. Once finalized, we will communicate the implementation timeline to all participating employers.

Thank you for your continued partnership.

IAM National 401(k) Plan