

Column 24 – Issuer

Issuer Definition:

The name of the legal entity that develops, registers and sells securities for the purpose of financing its operations and may be domestic or foreign governments, corporations or investment trusts. The issuer is legally responsible for the obligations of the issue and for reporting financial conditions, material developments and any other operational activities as required by the regulations of their jurisdictions.

The reporting entity is encouraged to use the following sources:

- Bloomberg
- Interactive Data Corporation (IDC)
- Thomson Reuters
- S&P/CUSIP
- Name used in either the relevant SEC filing or legal documentation for the transaction. Issuer is the name of the legal entity that can be found on documents such as SEC Form 424B2, Note Agreements, Prospectuses and Indentures as appropriate. The name used should be as complete and detailed as possible to enable users to differentiate the legal entity issuing the security from another legal entity with a similar name.

Do not report ticker symbols, either internal or otherwise.

Column 25 – Issue

Issue information provides detailed data as to the type of security being reported (e.g., coupon, description of security, etc.). Below are examples of what could be provided but additional information should be provided as appropriate for the security.

6% Senior 2018
7% Subordinated Debenture 11/15/2022
3% NY Housing Authority Debenture 2035

The reporting entity is encouraged to use the following sources:

- Bloomberg
- Interactive Data Corporation (IDC)
- Thomson Reuters
- S&P/CUSIP
- Descriptions used in either the relevant SEC filing or legal documentation for the transaction.

Do not report ticker symbols, either internal or otherwise. Include tranche information.

Column 26 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column I.

SCHEDULE D – PART 5

LONG-TERM BONDS AND STOCKS ACQUIRED DURING THE YEAR AND FULLY DISPOSED OF DURING CURRENT YEAR

This schedule should include a detailed listing of all securities that were both purchased/acquired and sold/disposed of during the current reporting year (amounts purchased and sold during the current reporting year are also reported in subtotals in Schedule D, Parts 3 and 4).

Reporting entities should track information separately for securities purchased in different lots rather than using some type of averaging for the issue in aggregate. Thus, this schedule should only be used when an entire lot of a security has been purchased and sold during the current reporting year (even when different lots of the same security still exist on the reporting entity's books).

As with Schedule D, Parts 3 and 4, this schedule should not be used for a transaction unless it affects the cost basis of the securities. Thus, it should not be used for allocations of TBAs to specific pools subsequent to initial recording in Schedule D, Part 3 or other situations such as CUSIP number changes.

Bonds, preferred stocks and common stocks are to be grouped separately, showing subtotals for each category. Bonds should be grouped and arranged alphabetically as described in the instructions for Schedule D, Part 4. (Securities included in U.S. States, Territories and Possessions; U.S. Political Subdivisions of States, Territories and Possessions; and U.S. Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions should be listed with a state abbreviation in the column provided for electronic data capture).

Bond Mutual Funds – as Identified by the SVO and Exchange Traded Funds – as Identified by the SVO that are described in the Investment Schedules General Instructions are to be included in SVO Identified Funds.

If a reporting entity has any detail lines reported for any of the following required categories or subcategories, it shall report the subtotal amount of the corresponding category or subcategory with the specified subtotal line number appearing in the same manner and location as the pre-printed total or grand total line number:

NOTE: See the Investment Schedules General Instructions for the following:

- **Category definitions for bonds and stocks.**
- **Foreign column code list.**

<u>Category</u>	<u>Line Number</u>
Bonds:	
U.S. Governments	0599999
All Other Governments	1099999
U.S. States, Territories and Possessions (Direct and Guaranteed).....	1799999
U.S. Political Subdivisions of States, Territories and Possessions (Direct and Guaranteed).....	2499999
U.S. Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions	3199999
Industrial and Miscellaneous (Unaffiliated)	3899999
Hybrid Securities	4899999
Parent, Subsidiaries and Affiliates	5599999
SVO Identified Funds.....	8099999
Unaffiliated Bank Loans.....	8299999
Subtotals – Bonds.....	8399998

Preferred Stocks:

Industrial and Miscellaneous (Unaffiliated) Perpetual Preferred	8499999
Industrial and Miscellaneous (Unaffiliated) Redeemable Preferred.....	8599999
Parent, Subsidiaries and Affiliates Perpetual Preferred.....	8699999
Parent, Subsidiaries and Affiliates Redeemable Preferred	8799999
Subtotals – Preferred Stocks.....	8999998

Common Stocks:

Industrial and Miscellaneous (Unaffiliated) Publicly Traded.....	9099999
Industrial and Miscellaneous (Unaffiliated) Other	9199999
Parent, Subsidiaries and Affiliates Publicly Traded.....	9299999
Parent, Subsidiaries and Affiliates Other.....	9399999
Mutual Funds.....	9499999
Unit Investment Trusts	9599999
Closed-End Funds	9699999
Subtotals – Common Stocks.....	9799998
Subtotals – Preferred and Common Stocks	9899999

Totals..... 9999999

Only those bonds and certificates of deposit with maturity at time of acquisition in excess of one year are to be included. Include repoolings of mortgage-backed/asset-backed securities (e.g., securitization/megatization of FHLMC or FNMA mortgage-backed securities). Refer to *SSAP No. 43R—Loan-Backed and Structured Securities* for accounting guidance. Exclude cash equivalents as described in *SSAP No. 2R—Cash, Cash Equivalents, Drafts, and Short-Term Investments* with original maturities of three months or less.

A bond acquisition or disposal is recorded on the trade date, not the settlement date, except for the acquisition of private placement bonds, use the funding date.

Column 1 – CUSIP Identification

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the Standard & Poor's CUSIP Bureau. For foreign securities, use a CINS that is assigned by the Standard & Poor's CUSIP Bureau: www.cusip.com/cusip/index.htm.

If no valid CUSIP, CINS or PPN number exists, then report a valid ISIN (Column 26) security number. The CUSIP field should be zero-filled.

Column 2 – Description

Give a description of all bonds and preferred and common stocks, including location of all banks, trust and miscellaneous companies. As appropriate, the reporting entity is encouraged to include data consistent with that reported in Column 24, Issuer and Column 25, Issue. This does not preclude the company from including additional detail to provide a complete and accurate description. Abbreviations may be used as needed.

For SVO Identified Funds (Bond Mutual Funds and Exchange Traded Funds), enter complete name of the fund. As appropriate, the reporting entity is encouraged to include data consistent with that reported for Column 24, Issuer.

For Certificate of Deposit Account Registry Service (CDARS) or other similar services that have a maturity of greater than one year, individually list the various banking institutions that are financially responsible for honoring certificates of deposit. As appropriate, the name of the banking institutions should follow from the registry of the Federal Financial Institutions Examination Council (FFIEC) (www.ffiec.gov/nicpubweb/nicweb/SearchForm.aspx).

For CDOs (Collateralized Debt Obligations) or CLOs (Collateralized Loan Obligations), indicate what the CDO/CLO collateral is, such as high-yield bonds, corporate loans, etc. If the collateral is of mixed type, indicate "Mix," in addition to the largest type of collateral in the mix. If the collateral is derived synthetically, indicate "synthetic."

Column 3 – Foreign

Insert the appropriate code in the column based on the list provided in the **Investment Schedules General Instructions**.

Column 4 – Date Acquired

For public placements use trade date, not settlement date. For private placements, use funding date. Reporting entities may total on one line each issue of bonds or stocks acquired at public offerings on more than one date and insert the date of last acquisition.

For SVO Identified Funds (Bond Mutual Funds and Exchange Traded Funds), enter date of last purchase.

Column 5 – Name of Vendor

The items which refer to each issue of bonds and stocks acquired at public offerings may be totaled in one line and the word "various" inserted.

Column 6 – Disposal Date

For public placements use trade date, not settlement date. For private placements, use funding date. Reporting entities may total on one line each issue of bonds or stocks disposed of at public offerings on more than one date and insert the date of last disposal.

For SVO Identified Funds (Bond Mutual Funds and Exchange Traded Funds), enter date of last disposal.

Column 7 – Name of Purchaser

If matured or called under redemption option, so state and give price at which called.

Column 9 – Actual Cost

This is the recorded cost of an investment that was purchased during the current reporting year and sold during the current reporting year.

Include: Cost of acquiring the bond or stock, including broker's commission and other related fees to the extent they do not exceed the fair value at the date of acquisition.

Exclude: Accrued interest and dividends.

All other costs, including internal costs or costs paid to an affiliated reporting entity related to origination, purchase or commitment to purchase bonds, are charged to expense when incurred.

For a bond received as a property dividend or capital contribution enter the actual recognized value. See *SSAP No. 26R—Bonds* for guidance.

Column 10 – Consideration

Include: In the determination of this amount the broker's commission and incidental expenses of effecting delivery.

Exclude: Accrued interest and dividends.

For SVO Identified Funds (Bond Mutual Funds and Exchange Traded Funds), enter price received at sale, usually the number of shares sold times the selling price per share.

Column 11 – Book /Adjusted Carrying Value at Disposal

This should equal the Actual Cost column amount (adjusted for other-than-temporary impairments recognized) for each specific common stock and for each preferred stock that is not amortizable and Amortized Cost (adjusted for other-than-temporary impairments recognized) at disposal date for each specific bond and for each specific redeemable preferred stock that is amortizable.

Deduct: A direct write-down for a decline in the fair value of a bond that is other-than-temporary.

Exclude: Accrued interest.

Column 13 – Current Year's (Amortization)/Accretion

This amount should equal the current reporting year's amortization of premium or accrual of discount up to the disposal date. The accrual of discount amounts in this column are to be reported as increases to investment income in the Exhibit of Net Investment Income, while the amortization of premium amounts are to be reported as decreases to investment income.

Column 14 – Current Year's Other-Than-Temporary Impairment Recognized

If the security has suffered an "other-than-temporary impairment," this column should contain the amount of the direct write-down recognized. The amounts in this column are to be reported as realized capital losses in the Exhibit of Capital Gains/(Losses) and in the calculation of Net Income.

Column 15 – Total Change in Book/Adjusted Carrying Value

This column should equal the net of:

Unrealized Valuation Increase/(Decrease)
plus Current Year's (Amortization)/Accretion
minus Current Year's Other-Than-Temporary Impairment Recognized.

This amount, plus any foreign exchange adjustment related to these amounts (reported in the Total Foreign Exchange Change in Book/Adjusted Carrying Value column), should represent the difference between the current reporting year's Book/Adjusted Carrying Value at Disposal Date and the security's Actual Cost (adjusted for any other-than-temporary impairment recognized).

Column 16 – Total Foreign Exchange Change in Book/Adjusted Carrying Value

The total foreign exchange change for a specific security will be the amount necessary to reverse the net effect of unrealized foreign exchange gains (losses) recognized while the security was owned by the company. This includes the reversal of unrealized increase (decrease) recorded in previous year(s).

The amounts reported in this column should be included as net unrealized foreign exchange capital gain (loss) in the Capital and Surplus Account (Page 4).

Column 17 – Foreign Exchange Gain (Loss) On Disposal

Report the foreign exchange gain or loss on disposal.

Column 18 – Realized Gain (Loss) on Disposal

This should be the difference between the Consideration column amount and the Book/Adjusted Carrying Value at Disposal Date, excluding any portion that is attributable to foreign exchange differences.

Bonds called where consideration received exceeds par:

For securities sold, redeemed or otherwise disposed of, which generate investment income as a result of a prepayment penalty and/or acceleration fee; the amount of realized gain (loss) reported is equal to the Par value of the investment (Column 8) less the BACV at the Disposal Date (Column 11).

Bonds called where consideration received is less than par:

For securities sold, redeemed or otherwise disposed of, the amount of investment income and realized gain reported shall be calculated in accordance with *SSAP No. 26R—Bonds*.

Column 19 – Total Gain (Loss) On Disposal

Report the sum of Column 17, foreign exchange gain or (loss), and Column 18, realized gain or (loss).

Column 20 – Interest and Dividends Received During Year

For Mutual Funds (including Bond Mutual Funds – as Identified by the SVO and Exchange Traded Funds – as Identified by the SVO), enter the amount of distributions received in cash or reinvested in additional shares.

Include: The proportionate share of investment income directly related to the securities reported in this schedule.

Report amounts net of foreign withholding tax.

Bonds called where consideration received exceeds par:

For securities sold, redeemed or otherwise disposed of, which generate investment income as a result of a prepayment penalty and/or acceleration fee, the amount of investment income reported is equal to the total consideration received (Column 10) less the Par value of the investment (Column 8).

Bonds called where consideration received is less than par:

For securities sold, redeemed or otherwise disposed of, the amount of investment income and realized gain reported shall be calculated in accordance with *SSAP No. 26R—Bonds*.

**** Columns 22 through 26 will be electronic only. ****

Column 22 – State Abbreviation

Applies to:

U.S. States, Territories and Possessions

Include appropriate state abbreviation for the state where the security is issued (e.g., "Mo" for Missouri).

U.S. Political Subdivisions of States, Territories and Possessions

Include appropriate state abbreviation for the state where the security is issued.

U.S. Federal Revenue, Special Assessments Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions

Include appropriate state abbreviation for the state where the security is issued. Use "US" for federal agency issues.

Column 23 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any issuer as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

Column 24 – Issuer

Issuer Definition:

The name of the legal entity that develops, registers and sells securities for the purpose of financing its operations and may be domestic or foreign governments, corporations or investment trusts. The issuer is legally responsible for the obligations of the issue and for reporting financial conditions, material developments and any other operational activities as required by the regulations of their jurisdictions

The reporting entity is encouraged to use the following sources:

- Bloomberg
- Interactive Data Corporation (IDC)
- Thomson Reuters
- S&P/CUSIP
- Name used in either the relevant SEC filing or legal documentation for the transaction. Issuer is the name of the legal entity that can be found on documents such as SEC Form 424B2, Note Agreements, Prospectuses and Indentures as appropriate. The name used should be as complete and detailed as possible to enable users to differentiate the legal entity issuing the security from another legal entity with a similar name.

Do not report ticker symbols, either internal or otherwise.

Column 25 – Issue

Issue information provides detailed data as to the type of security being reported (e.g., coupon, description of security, etc.). Below are examples of what could be provided but additional information should be provided as appropriate for the security.

6% Senior 2018
7% Subordinated Debenture 11/15/2022
3% NY Housing Authority Debenture 2035

The reporting entity is encouraged to use the following sources:

- Bloomberg
- Interactive Data Corporation (IDC)
- Thomson Reuters
- S&P/CUSIP
- Descriptions used in either the relevant SEC filing or legal documentation for the transaction.

Do not report ticker symbols, either internal or otherwise. Include tranche information.

Column 26 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column I.

SCHEDULE D – PART 6 – SECTION 1

VALUATION OF SHARES OF SUBSIDIARY, CONTROLLED OR AFFILIATED COMPANIES

If a reporting entity has any common stock or preferred stock reported for any of the following required categories or subcategories, it shall report the subtotal amount of the corresponding category or subcategory, with the specified subtotal line number appearing in the same manner and location as the pre-printed total or grand total line and number:

<u>Category</u>	<u>Line Number</u>
Preferred Stocks:	
Parent.....	0199999
U.S. Property & Casualty Insurer.....	0299999
U.S. Life Insurer.....	0399999
U.S. Health Entity #.....	0499999
Alien Insurer.....	0599999
Non-Insurer Which Controls Insurer.....	0699999
*Investment Subsidiary.....	0799999
Other Affiliates.....	0899999
Subtotals – Preferred Stocks.....	0999999
Common Stocks:	
Parent.....	1099999
U.S. Property & Casualty Insurer.....	1199999
U.S. Life Insurer.....	1299999
U.S. Health Entity #.....	1399999
Alien Insurer.....	1499999
Non-Insurer Which Controls Insurer.....	1599999
*Investment Subsidiary.....	1699999
Other Affiliates.....	1799999
Subtotals – Common Stocks.....	1899999
Totals – Preferred and Common Stocks.....	1999999

– Include in this category any health entities that file the Health Risk-Based Capital formula.

*NOTE: Investment Subsidiary shall mean any subsidiary, other than a holding company, engaged or organized primarily in the ownership and management of investments for the reporting entity. An investment subsidiary shall not include any broker dealer or a money management fund managing funds other than those of the parent company. The following criteria are applicable:

1. 95% or more of the investment subsidiary's assets would qualify as admitted assets;
2. The investment subsidiary's total liabilities are 5% or less of total assets;
3. Combining the pro-rata ownership shares of the assets of all the investment subsidiaries with the owning reporting entity's assets does not violate any state requirements concerning diversification of investments or limitations on investments in a single entity; and
4. The investment subsidiary's book/adjusted carrying value does not exceed the imputed value on a statutory accounting basis. If the book/adjusted carrying value does exceed the imputed statutory value, the reporting entity may either nonadmit the excess or categorize such subsidiary in the "All Other Affiliates" category.

Column 1 – CUSIP Identification

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the Standard & Poor's CUSIP Bureau. For foreign securities, use a CINS that is assigned by the Standard & Poor's CUSIP Bureau: www.cusip.com/cusip/index.htm.

If no valid CUSIP, CINS or PPN number exists, then report a valid ISIN (Column 16) security number. The CUSIP field should be zero-filled.

Column 2 – Description

List the preferred and common stocks for each subsidiary, controlled or affiliated (CA) company, as defined in the General section of these instructions. The description should be the same as provided for Schedule D, Part 2, Sections 1 and 2.

Column 3 – Foreign

Insert the appropriate code in the column based on the **list provided in the Investment Schedules General Instructions**.

Column 4 – NAIC Company Code

If not applicable, the NAIC Company Code field should be zero-filled.

Column 5 – ID Number

Enter one of the following as appropriate for the entity being reported on the schedule. See the Schedule F (Property and Title) or Schedule S (Life, Health and Fraternal) General Instructions for more information on these identification numbers.

Federal Employer Identification Number	(FEIN)	
Alien Insurer Identification Number	(AIIN)	*
Certified Reinsurer Identification Number	(CRIN)	*

- * AIINs or CRINs are only reported if the entity is a reinsurer that has had an AIIN or CRIN number assigned or should have one assigned due to transactions being reported on Schedule F (Property and Title) or Schedule S (Life, Health and Fraternal) of another reporting entity.

If not applicable for the entity, leave blank.

Column 6 – NAIC Valuation Method

Include the NAIC valuation method as detailed *SSAP No. 97—Subsidiary, Controlled and Affiliated Entities*.

Use the following codes to indicate a specific valuation method:

<u>CODE</u>	<u>Valuation Method</u>
8a	Market Value
8bi	Investment in U.S. Insurance Company SCAs
8bii	Investments in Non-Insurance SCA Entities Statutory Basis
8biii	Investments in Non-Insurance SCA Entities GAAP Basis
8biv	Investments in Foreign Insurance Company SCA Entities

Any NAIC Valuation Method which has not been approved by the filing of a SUB 1 or SUB 2 form with the NAIC SCA Group and which is entered by the reporting entity under its own judgment shall have the letter "Z" appended to the method designation.

Column 7 – Do Insurer's Assets Include Intangible Assets Connected with Holding of Such Company's Stock?

State whether the assets shown by the reporting entity in its statement include, through the carrying value of stock of the SCA company valued under the *SSAP No. 97—Subsidiary, Controlled and Affiliated Entities*, intangible assets arising out of the purchase of such stock by the reporting entity or the purchase by the SCA Company of the stock of a lower-tier company controlled by the SCA Company. For purposes of this question, intangible assets at purchase shall be defined as the excess of the purchase price over the tangible net worth (total assets less intangible assets and total liabilities) represented by such shares as recorded immediately prior to the date of purchase, on the books of the company whose stock was purchased.

Column 8 – Total Amount of Such Intangible Asset

If the answer in Column 7 is "yes," give the total amount of intangible assets involved whether admitted or nonadmitted. The intangible assets shown for the SCA Company should include any intangible assets that are included in the SCA Company's carrying value of the stock of one or more lower-tier companies controlled by the SCA Company. In all cases, the current intangible assets equal the intangible assets at purchase, as defined above, minus any write-off thereof between the date of purchase and the statement date. If any portion of the total amount of intangible assets is required to be nonadmitted for all SCA companies combined in accordance with *SSAP No. 97—Investments in Subsidiary, Controlled and Affiliated Entities* and *SSAP No. 68—Business Combinations and Goodwill* state the total amount nonadmitted in the footnote at the bottom of this section of the schedule.

Column 10 – Nonadmitted Amount

Provide the amount nonadmitted, if any, included in Column 2 of the Asset page.

Column 11 – Stock of Such Company Owned by Insurer on Statement Date Number of Shares and
Column 12 – Stock of Such Company Owned by Insurer on Statement Date % of Outstanding

}

State the number of shares of stock of the SCA Company owned by the reporting entity on the statement date and the percent owned of the outstanding shares of the same class.

**** Column 13 through 16 will be electronic only. ****

Column 13 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any issuer as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

Column 14 – Issuer

Issuer Definition:

The name of the legal entity that develops, registers and sells securities for the purpose of financing its operations and may be domestic or foreign governments, corporations or investment trusts. The issuer is legally responsible for the obligations of the issue and for reporting financial conditions, material developments and all other operational activities as required by the regulations of their jurisdictions

Do not report ticker symbols, either internal or otherwise.

The issuer information should be the same as provided for Schedule D, Part 2, Sections 1 and 2.

Column 15 – Issue

Issue information provides detailed data as to the type of security being reported.

Do not report ticker symbols, either internal or otherwise.

The issue information should be the same as provided for Schedule D, Part 2, Sections 1 and 2.

Column 16 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of their respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

SCHEDULE D – PART 6 – SECTION 2

If a reporting entity has any common or preferred stocks reported for any of the following required categories or subcategories, it shall report the subtotal amount of the corresponding category or subcategory, with the specified subtotal line number appearing in the same manner and location as the pre-printed total or grand total line and number:

<u>Category</u>	<u>Line Number</u>
Preferred Stocks.....	0199999
Common Stocks.....	0299999
Totals – Preferred and Common Stocks	0399999

Column 2 – Name of Lower-Tier Company

List each company that is controlled by an SCA Company, meaning of holding a controlling block of the outstanding stock, either directly or through one or more intervening companies that are also so controlled. Do not include companies that are themselves SCA Companies listed in Section 1.

Column 3 – Name of Company Listed in Section 1 Which Controls Lower-Tier Company

If more than one SCA Company controls the lower-tier company, list each SCA Company and complete Columns 4 through 6 separately for each.

Column 4 – Total Amount of Intangible Assets Included in Amount Shown in Column 8, Section 1

As explained in the instructions for Section 1, this amount is based on the intangible assets at purchase of the stock of the lower-tier company, reduced by any subsequent write-off. The reporting entity also bases the amount shown on the proportionate ownership of the lower-tier company.

Column 5 – Stock in Lower-Tier Company Owned Indirectly by Insurer on Statement Date Number of Shares and
 Column 6 – Stock in Lower-Tier Company Owned Indirectly by Insurer on Statement Date % of Outstanding }

These figures represent the proportionate ownership by the reporting entity through the particular SCA Company.

**** Column 7 will be electronic only. ****

Column 7 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any issuer as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

Not for Distribution

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Not for Distribution

SCHEDULE DA – PART 1

SHORT-TERM INVESTMENTS OWNED DECEMBER 31 OF CURRENT YEAR

Include all investments whose maturities (or repurchase dates under repurchase agreement) at the time of acquisition were one year or less except those defined as cash or cash equivalents in accordance with *SSAP No. 2R—Cash, Cash Equivalents, Drafts and Short-Term Investments*. All short-term investments owned at Dec. 31 of current year should be separated into bonds, mortgage loans, other short-term invested assets and investments in parent, subsidiaries and affiliates. Within each category, investments should be arranged alphabetically.

Refer to *SSAP No. 23—Foreign Currency Transactions and Translations* for accounting guidance relating to foreign currency transactions and translations.

Repurchase and reverse repurchase agreements shall be shown gross when reported in the Schedule DA. If these transactions are permitted to be reported net in accordance with *SSAP No. 64—Offsetting and Netting of Assets and Liabilities*, the investment schedule shall continue to provide detail of all transactions (gross), with the net amount from the valid right to offset reflected in the financial statements (page 2 and page 3 of the statutory financial statements). Disclosures for items reported net when a valid right to offset exists, including the gross amount, the amount offset, and the net amount reported in the financial statements are required per *SSAP No. 64—Offsetting and Netting of Assets and Liabilities*.

Short Sales:

Selling a security short is an action by a reporting entity that results with the reporting entity recognizing proceeds from the sale and an obligation to deliver the sold security. For statutory accounting purposes, obligations to deliver securities resulting from short sales shall be reported as contra-assets (negative assets) in the investment schedule, with an investment code in the code column detailing the item as a short sale. The obligation (negative asset) shall be initially reflected at fair value, with changes in fair value recognized as unrealized gains and losses. These unrealized gains and losses shall be realized upon settlement of the short sale obligation. Interest on short sale positions shall be accrued periodically and reported as interest expense.

If a reporting entity has any detail lines reported for any of the following required categories or subcategories, it shall report the subtotal amounts of the corresponding category or subcategory with the specified subtotal line number appearing in the same manner and location as the pre-printed total or grand total line and number:

NOTE: See the Investment Schedules General Instructions for the following:

- **Category definitions for bonds.**
- **Foreign column code list and matrix for determining code.**
- **Code column list of codes and definitions for securities not under the exclusive control of the reporting entity.**

<u>Category</u>	<u>Line Number</u>
Bonds:	
U.S. Governments	
Issuer Obligations.....	0199999
Residential Mortgage-Backed Securities	0299999
Commercial Mortgage-Backed Securities.....	0399999
Other Loan-Backed and Structured Securities	0499999
Subtotals – U.S. Governments	0599999
All Other Governments	
Issuer Obligations.....	0699999
Residential Mortgage-Backed Securities	0799999
Commercial Mortgage-Backed Securities.....	0899999
Other Loan-Backed and Structured Securities	0999999
Subtotals – All Other Governments	1099999

U.S. States, Territories and Possessions (Direct and Guaranteed)	
Issuer Obligations.....	1199999
Residential Mortgage-Backed Securities	1299999
Commercial Mortgage-Backed Securities.....	1399999
Other Loan-Backed and Structured Securities	1499999
Subtotals – U.S. States, Territories and Possessions (Direct and Guaranteed).....	1799999
U.S. Political Subdivisions of States, Territories and Possessions (Direct and Guaranteed)	
Issuer Obligations.....	1899999
Residential Mortgage-Backed Securities	1999999
Commercial Mortgage-Backed Securities.....	2099999
Other Loan-Backed and Structured Securities	2199999
Subtotals – U.S. Political Subdivisions of States, Territories and Possessions (Direct and Guaranteed).....	2499999
U.S. Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions	
Issuer Obligations.....	2599999
Residential Mortgage-Backed Securities	2699999
Commercial Mortgage-Backed Securities.....	2799999
Other Loan-Backed and Structured Securities	2899999
Subtotals – U.S. Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions	3199999
Industrial and Miscellaneous (Unaffiliated)	
Issuer Obligations.....	3299999
Residential Mortgage-Backed Securities	3399999
Commercial Mortgage-Backed Securities.....	3499999
Other Loan-Backed and Structured Securities	3599999
Subtotals – Industrial and Miscellaneous (Unaffiliated).....	3899999
Hybrid Securities	
Issuer Obligations.....	4299999
Residential Mortgage-Backed Securities	4399999
Commercial Mortgage-Backed Securities.....	4499999
Other Loan-Backed and Structured Securities	4599999
Subtotals – Hybrid Securities.....	4899999
Parent, Subsidiaries and Affiliates Bonds	
Issuer Obligations.....	4999999
Residential Mortgage-Backed Securities	5099999
Commercial Mortgage-Backed Securities.....	5199999
Other Loan-Backed and Structured Securities	5299999
Affiliated Bank Loans – Issued.....	5399999
Affiliated Bank Loans – Acquired.....	5499999
Subtotals – Parent, Subsidiaries and Affiliates Bonds	5599999
SVO Identified Funds	
Exchange Traded Funds – as Identified by the SVO.....	5899999
Equity Mutual Funds – as Identified by the SVO	5999999
Subtotals – SVO Identified Funds.....	6099999
Unaffiliated Bank Loans	
Unaffiliated Bank Loans – Issued	6399999
Unaffiliated Bank Loans – Acquired.....	6499999
Subtotals – Unaffiliated Bank Loans.....	6599999

Total Bonds

Subtotals – Issuer Obligations.....	7699999
Subtotals – Residential Mortgage-Backed Securities.....	7799999
Subtotals – Commercial Mortgage-Backed Securities.....	7899999
Subtotals – Other Loan-Backed and Structured Securities.....	7999999
Subtotals – SVO Identified Funds.....	8099999
Subtotals – Affiliated Bank Loans.....	8199999
Subtotals – Unaffiliated Bank Loans.....	8299999
Subtotals – Bonds.....	8399999
Parent, Subsidiaries and Affiliates	
Mortgage Loans.....	8499999
Other Short-Term Invested Assets.....	8599999
Subtotals – Parent, Subsidiaries and Affiliates.....	8699999
Mortgage Loans.....	8799999
Other Short-Term Invested Assets.....	9099999
Total Short-Term Investments.....	9199999

Column 1 – Description

Give a complete and accurate description of all bonds, including identifying the kind of investment vehicle if other than short-term bond. Identify "repos" in Column 1; and for "repos," show the repurchase date. For collateral loans, the type of securities held and fair value of the securities should be included in the description.

Column 2 – Code

Enter "*" in this column for all SVO Identified Funds designated for systematic value.

Enter "@" in this column for all Principal STRIP Bonds or other zero coupon bonds.

Enter "^^" in this column for all assets that are bifurcated between the insulated separate account filing and the non-insulated separate account filing.

If short-term investments are not under the exclusive control of the company as shown in the General Interrogatories, they are to be identified by placing one of the codes **identified in the Investment Schedules General Instructions** in this column.

If the security is an SVO Identified Fund designated for systematic value or Principal STRIP bond or other zero coupon bond and is not under the exclusive control of the company, the "*" or "@" should appear first, immediately followed by the appropriate code (**identified in the Investment Schedules General Instructions**).

Separate Account Filing Only:

If the asset is a bifurcated asset between the insulated separate account filing and the non-insulated separate account filing, the "^^" should appear first and may be used simultaneously with the "*" or "@" with the "^^" preceding the "*" or "@" depending on the asset being reported, immediately followed by the appropriate code (**identified in the Investment Schedules General Instructions**).

Column 3 – Foreign

Insert the appropriate code in the column based on the **matrix provided in the Investment Schedules General Instructions**.

Column 4	– Date Acquired	For public placements, use trade date not settlement date. For private placements, use funding date. Reporting entities may total on one line each issue of bonds or stocks acquired at public offerings on more than one date and insert the date of last acquisition.
Column 5	– Name of Vendor	Reporting entities may total on one line purchases of various issues of the same issuer of short-term investments and insert the word “various.”
Column 6	– Maturity Date	Reporting entities may total on one line purchases of various issues of the same issuer of short-term investments and insert the appropriate maturity date.
Column 7	– Book/Adjusted Carrying Value	<p>Securities excluding SVO Identified fund and mandatory convertible bonds:</p> <p>This should be the amortized value or the lower of amortized value or fair value, as appropriate (and adjusted for any other-than-temporary impairment) as of the end of the current reporting year.</p> <p>Include: The original cost of acquiring the investment, including brokerage and other related fees.</p> <p> Amortization of premium or accrual of discount, but not including any accrued interest or dividends paid thereon.</p> <p> Amortization of deferred origination and commitment fees.</p> <p>Deduct: A direct write-down for a decline in the fair value that is other-than-temporary.</p> <p>Exclude: All other costs, including internal costs or costs paid to an affiliated reporting entity related to origination, purchase or commitment to purchase, are charged to expense when incurred. Cost should also be reduced by payments attributed to the recovery of cost.</p> <p> Accrued interest or dividends.</p> <p>Mandatory Convertible Bonds:</p> <p>The amount should be the lower of amortized cost or fair value during the period prior to conversion.</p> <p>SVO Identified Funds:</p> <p>The amount should be fair value unless the reporting entity has designated a qualifying security for systematic value. The election of using systematic value is irrevocable.</p> <p>NOTE: Use of systematic value is effective Dec. 31, 2017. This effective date requires entities to either report SVO-Identified investments at fair value on the effective date, or to identify the SVO-Identified investments with a code to identify use of systematic value. If the investment is coded for systematic value, the investment will be reported in the 2017 annual financial statements using the measurement method utilized throughout 2017. For these investments, beginning Jan. 1, 2018, the reporting entity shall report the investment using the calculated systematic value method detailed in <i>SSAP No. 26R—Bonds</i>.</p>

The amount reported in this column should equal:

	Actual Cost
plus	Unrealized Valuation Increase (Decrease) Total in Book/Adjusted Carrying Value
plus	Current Year's (Amortization)/Accretion
minus	Current Year's Other-Than-Temporary Impairment Recognized
plus	Total Foreign Exchange Change in Book/Adjusted Carrying Value
plus	Changes due to acquisitions or disposals.

Column 8 – Unrealized Valuation Increase (Decrease)

The total unrealized valuation increase (decrease) for a specific security will be the change in Book/Adjusted Carrying Value that is due to carrying or having carried (in the previous year) the security at Fair Value.

Include For SVO-identified funds, the change from the prior reported BACV to fair value/net asset value. If an SVO-identified fund no longer qualifies for systematic value, the difference from systematic value in prior year to fair value/net asset value in current year.

These amounts are to be reported as unrealized capital gains (losses) in the Exhibit of Capital Gains (Losses) and in the Capital and Surplus Account.

Column 9 – Current Year's (Amortization)/Accretion

This amount should equal the current reported year's amortization of premium or accrual of discount (regardless of whether the security is currently carried at Amortized Cost). The accrual of discount amounts in this column are to be reported as increases to investment income in the Exhibit of Net Investment Income, while the amortization of premium amounts are to be reported as decreases to investment income.

Include The (Amortization)/Accretion of SVO Identified Funds designated for reporting at systematic value.

Column 10 – Current Year's Other-Than-Temporary Impairment Recognized

If the security has suffered an other-than-temporary impairment, this column should contain the amount of the direct write-down recognized. The amounts in this column are to be reported as realized capital losses in the Exhibit of Capital Gains (Losses) and in the calculation of Net Income.

Column 11 – Total Foreign Exchange Change in Book/Adjusted Carrying Value

This is a positive or negative amount that is defined as the portion of the total change in Book/Adjusted Carrying Value for the year that is attributable to foreign exchange differences for a particular security. The amounts reported in this column should be included as net unrealized foreign exchange capital gain (loss) in the Capital and Surplus Account.

Column 12 – Par Value

Enter the par value of the bonds owned adjusted for repayment of principal. For mortgage-backed/loan-backed and structured securities, enter the par amount of principal to which the company has claim. For interest-only bonds without a principal amount on which the company has a claim, use a zero value. Enter the statement date par value for bonds with adjustable principal. An interest-only bond with a small par amount of principal would use that amount.

Column 13	–	Actual Cost
		<p>Include: Cost of acquiring the issue, including brokers' commission and incidental expenses of effecting delivery.</p> <p>Exclude: Accrued interest.</p> <p>For a bond received as a property dividend or capital contribution enter the initial recognized value. See <i>SSAP No. 26R—Bonds</i> for guidance.</p>
Column 15	–	Nonadmitted Interest Due & Accrued
		<p>This should equal the nonadmitted amount of due and accrued interest for a specific security, based upon the assessment of collectibility required by <i>SSAP No. 34—Investment Income Due and Accrued</i> and any other requirements for nonadmitting investment income due and accrued.</p>
Column 16	–	Rate of Interest
		<p>Show rate of interest as stated on the face of the issue. Where the original stated rate has been renegotiated, show the latest modified rate. Short-term bonds with various issues of the same issuer use the last rate of interest. All information reported in this field must be a numeric value.</p> <p>For Principal STRIP Bonds or other zero coupon bonds, enter numeric zero (0).</p>
Column 17	–	Effective Rate of Interest
		<p>Short-term bonds with various issues of the same issuer use the weighted average effective yield to maturity. The Effective Yield calculation should be modified for other-than-temporary impairments recognized. All information reported in this field must be a numeric value.</p>
Column 18	–	Interest – When Paid
		<p>Insert initial letters of month in which interest is payable. For securities that pay interest annually, provide the first three letters of the month in which the interest is paid (e.g., JUN for June). For securities that pay interest semi-annually or quarterly, provide the first letter of each month in which interest is received (e.g., JD for June and December, and MJSD for March, June, September and December). For securities that pay interest on a monthly basis, include "MON" for monthly. Finally, for securities that pay interest at maturity, include "MAT" for maturity.</p> <p>For Principal STRIP Bonds or other zero coupon bonds, enter N/A.</p>
Column 19	–	Interest – Amount Received During Year
		<p>Include: The proportionate share of investment income directly related to the securities reported in this schedule.</p> <p>Report amounts net of foreign withholding tax.</p>
		<p>** Column 19 will be electronic only. **</p>
Column 21	–	Legal Entity Identifier (LEI)
		<p>Provide the 20-character Legal Entity Identifier (LEI) for any issuer as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.</p>

Not for Distribution

SCHEDULE DB

DERIVATIVE INSTRUMENTS

All derivatives, regardless of maturity date, are to be reported on Schedule DB. Forward commitments where a reporting entity cannot determine at the inception of the contract, with certainty, if delivery will be made at the earliest opportunity are essentially forward contracts and should be reported on Schedule DB.

This schedule should be used to report derivative instruments. Specific accounting procedures for each derivative instrument will depend on the definition below and documented intent that best describes the instrument. Uses of derivative instruments that are reported in this schedule include hedging, income generation, replication and other. State investment laws and regulations should be consulted for applicable limitations and permissibility on the use of derivative instruments. If the derivative strategy meets the definition of hedging as outlined in *SSAP No. 86—Derivatives*, then the underlying derivative transactions composing that strategy should be reported in that category of Schedule DB. If the underlying derivative strategy does not meet the definition of hedging as per *SSAP No. 86—Derivatives*, then the underlying derivative transactions composing that strategy should be reported as either hedging other, replication, income generation or other.

DEFINITIONS OF DERIVATIVE INSTRUMENTS

A hedge transaction is “Anticipatory” if it relates to:

- a. A firm commitment to purchase assets or incur liabilities;
- b. An expectation (but not obligation) to purchase assets or incur liabilities in the normal course of business.

“*Underlying Interest*” means the asset(s), liability(ies) or other interest(s) underlying a derivative instrument, including, but not limited to, any one or more securities, currencies, rates, indices, commodities, derivative instruments, or other financial market instruments.

“*Option*” means an agreement giving the buyer the right to buy or receive, sell or deliver, enter into, extend or terminate, or effect a cash settlement based on the actual or expected price, level, performance or value of one or more Underlying Interests.

“*Warrant*” means an agreement that gives the holder the right to purchase an underlying financial instrument at a given price and time or at a series of prices and times according to a schedule or warrant agreement.

“*Cap*” means an agreement obligating the seller to make payments to the buyer, each payment under which is based on the amount, if any, that a reference price, level, performance or value of one or more Underlying Interests exceed a predetermined number, sometimes called the strike/cap rate or price.

“*Floor*” means an agreement obligating the seller to make payments to the buyer, each payment under which is based on the amount, if any, that a predetermined number, sometimes called the strike/floor rate or price exceeds a reference price, level, performance or value of one or more Underlying Interests.

“*Collar*” means an agreement to receive payments as the buyer of an Option, Cap or Floor and to make payments as the seller of a different Option, Cap or Floor.

“*Swap*” means an agreement to exchange or net payments at one or more times based on the actual or expected price, level, performance or value of one or more Underlying Interests or upon the probability occurrence of a specified credit or other event.

“Forward” means an agreement (other than a Future) to make or take delivery of, or effect a cash settlement based on, the actual or expected price, level, performance or value of one or more Underlying Interests.

“Future” means an agreement traded on an exchange, Board of Trade or contract market to make or take delivery of, or effect a cash settlement based on, the actual or expected price, level, performance or value one or more Underlying Interests.

“Option Premium” means the consideration paid (received) for the purchase (sale) of an Option.

“Financing Premium” means that the premium cost to acquire or enter into the derivative is paid at the end of the derivative contract or throughout the derivative contract.

“Swaption” means an agreement granting the owner the right, but not the obligation, to enter into an underlying swap.

“Margin Deposit” means a deposit that a reporting entity is required to maintain with a broker with respect to the Futures Contracts purchased or sold.

DEFINITION OF NOTIONAL AMOUNT

The definition below is intended to be a principle for determining notional for all derivative instruments. To the extent a derivative type is not explicitly addressed in a through c, notional should be reported in a manner consistent with this principle.

“Notional amount” is defined as the face value of a financial instrument in a derivatives transaction as of a reporting date, which is used to calculate future payments in the reporting currency. Notional amount may also be referred to as notional value or notional principal amount. The notional amount reported should remain static over the life of a trade unless the instrument is partially unwound or has a contractually amortizing notional. The notional amount shall apply to derivative transactions as follows:

- a. For derivative instruments other than futures contracts (e.g., options, swaps, forwards), the notional amount is either the amount to which interest rates are applied in order to calculate periodic payment obligations or the amount of the contract value used to determine the cash obligation. Non-U.S. dollar contracts must be multiplied or divided by the appropriate inception foreign currency rate.
- b. For futures contracts, with a U.S. dollar-denominated contract size (e.g., Treasury note and bond contracts, Eurodollar futures) or underlying, the notional amount is the number of contracts at the reporting date multiplied by the contract size (value of one point multiplied by par value).
- c. For equity index and similar futures, the number of contracts at the reporting date is multiplied by the value of one point multiplied by the transaction price. Non-U.S. dollar contract prices must be multiplied or divided by the appropriate inception foreign currency rate.

GENERAL INSTRUCTIONS FOR SCHEDULE DB

Each derivative instrument should be reported in Parts A, B or C according to the nature of the instrument, as follows:

- Part A: Positions in Options,* Caps, Floors, Collars, Swaps, and Forwards**
- Part B: Positions in Futures Contracts
- Part C: Positions in Replication (Synthetic Asset) Transaction

* Warrants acquired in conjunction with public or private debt or equity that are more appropriately reported in other schedules do not have to be reported in Schedule DB.

** Forward commitments that are not derivative instruments (for example, the commitment to purchase a GNMA security two months after the commitment date or a private placement six months after the commitment date) should be disclosed in the Notes to Financial Statements, rather than on Schedule DB.

All derivatives, regardless of maturity date, are to be reported on Schedule DB. Forward commitments where the reporting entity cannot determine at the inception of the contract, with certainty, if delivery will be made at the earliest opportunity are essentially forward contracts and should be reported on Schedule DB.

The reporting entity may be required to demonstrate the intended hedging characteristics under state statute in order to report in this derivative "Hedge Other" category.

The fair value is the value at which the instrument(s) could be exchanged in a current transaction. Amortized or book/adjusted carrying values should not be substituted for fair value. Public market quotes are the best indication of fair value. The reporting entity should document the determination of fair value.

Part D should be used to report the counterparty exposure (i.e., the exposure to credit risk on derivative instruments) to each counterparty (or guarantor, as appropriate).

Derivatives shall be shown gross when reported in the Schedule DB. If these transactions are permitted to be reported net in accordance with *SSAP No. 64—Offsetting and Netting of Assets and Liabilities*, the investment schedule shall continue to provide detail of all transactions (gross), with the net amount from the valid right to offset reflected in the financial statements (pages 2 & 3 of the statutory financial statements). Disclosures for items reported net when a valid right to offset exists, including the gross amount, the amount offset, and the net amount reported in the financial statements are required per *SSAP No. 64—Offsetting and Netting of Assets and Liabilities*.

SCHEDULE DB – PART A
SECTIONS 1 AND 2

GENERAL INSTRUCTIONS

In each section, separate derivative instruments into the following categories:

<u>Category</u>	<u>Line Number</u>
Purchased Options	
Hedging Effective – Excluding Variable Annuity Guarantees Under SSAP No. 108	
Call Options and Warrants.....	0019999999
Put Options.....	0029999999
Caps.....	0039999999
Floors.....	0049999999
Collars.....	0059999999
Other.....	0069999999
Subtotal – Hedging Effective.....	0079999999
Hedging Effective – Variable Annuity Guarantees Under SSAP No. 99	
Call Options and Warrants.....	0089999999
Put Options.....	0099999999
Caps.....	0109999999
Floors.....	0119999999
Collars.....	0129999999
Other.....	0139999999
Subtotal – Hedging Effective.....	0149999999
Hedging Other	
Call Options and Warrants.....	0159999999
Put Options.....	0169999999
Caps.....	0179999999
Floors.....	0189999999
Collars.....	0199999999
Other.....	0209999999
Subtotal – Hedging Other.....	0219999999
Replications	
Call Options and Warrants.....	0229999999
Put Options.....	0239999999
Caps.....	0249999999
Floors.....	0259999999
Collars.....	0269999999
Other.....	0279999999
Subtotal – Replications.....	0289999999
Income Generation	
Call Options and Warrants.....	0299999999
Put Options.....	0309999999
Caps.....	0319999999
Floors.....	0329999999
Collars.....	0339999999
Other.....	0349999999
Subtotal – Income Generation.....	0359999999

Other

Call Options and Warrants.....	0369999999
Put Options.....	0379999999
Caps.....	0389999999
Floors.....	0399999999
Collars.....	0409999999
Other.....	0419999999
Subtotal – Other.....	0429999999

Total Purchased Options

Subtotal – Call Options and Warrants.....	0439999999
Subtotal – Put Options.....	0449999999
Subtotal – Caps.....	0459999999
Subtotal – Floors.....	0469999999
Subtotal – Collars.....	0479999999
Subtotal – Other.....	0489999999
Subtotal – Total Purchased Options.....	0499999999

Written Options

Hedging Effective – Excluding Variable Annuity Guarantees Under SSAP No. 108

Call Options and Warrants.....	0509999999
Put Options.....	0519999999
Caps.....	0529999999
Floors.....	0539999999
Collars.....	0549999999
Other.....	0559999999
Subtotal – Hedging Effective.....	0569999999

Hedging Effective – Variable Annuity Guarantees Under SSAP No. 108

Call Options and Warrants.....	0579999999
Put Options.....	0589999999
Caps.....	0599999999
Floors.....	0609999999
Collars.....	0619999999
Other.....	0629999999
Subtotal – Hedging Effective.....	0639999999

Hedging Other

Call Options and Warrants.....	0649999999
Put Options.....	0659999999
Caps.....	0669999999
Floors.....	0679999999
Collars.....	0689999999
Other.....	0699999999
Subtotal – Hedging Other.....	0709999999

Replications

Call Options and Warrants.....	0719999999
Put Options.....	0729999999
Caps.....	0739999999
Floors.....	0749999999
Collars.....	0759999999
Other.....	0769999999
Subtotal – Replications.....	0779999999

Income Generation

Call Options and Warrants.....	0789999999
Put Options.....	0799999999
Caps.....	0809999999
Floors.....	0819999999
Collars.....	0829999999
Other.....	0839999999
Subtotal – Income Generation.....	0849999999

Other

Call Options and Warrants.....	0859999999
Put Options.....	0869999999
Caps.....	0879999999
Floors.....	0889999999
Collars.....	0899999999
Other.....	0909999999
Subtotal – Other.....	0919999999

Total Written Options

Subtotal – Call Options and Warrants.....	0929999999
Subtotal – Put Options.....	0939999999
Subtotal – Caps.....	0949999999
Subtotal – Floors.....	0959999999
Subtotal – Collars.....	0969999999
Subtotal – Other.....	0979999999
Subtotal – Total Written Options.....	0989999999

Swaps

Hedging Effective – Excluding Variable Annuity Guarantees Under SSAP No. 108

Interest Rate.....	0999999999
Credit Default.....	1009999999
Foreign Exchange.....	1019999999
Total Return.....	1029999999
Other.....	1039999999
Subtotal – Hedging Effective.....	1049999999

Hedging Effective – Variable Annuity Guarantees Under SSAP No. 108

Interest Rate.....	1059999999
Credit Default.....	1069999999
Foreign Exchange.....	1079999999
Total Return.....	1089999999
Other.....	1099999999
Subtotal – Hedging Effective.....	1109999999

Hedging Other

Interest Rate.....	1119999999
Credit Default.....	1129999999
Foreign Exchange.....	1139999999
Total Return.....	1149999999
Other.....	1159999999
Subtotal – Hedging Other.....	1169999999

Replication

Interest Rate	1179999999
Credit Default.....	1189999999
Foreign Exchange	1199999999
Total Return	1209999999
Other	1219999999
Subtotal – Replication.....	1229999999

Income Generation

Interest Rate	1239999999
Credit Default.....	1249999999
Foreign Exchange	1259999999
Total Return	1269999999
Other	1279999999
Subtotal – Income Generation.....	1289999999

Other

Interest Rate	1299999999
Credit Default.....	1309999999
Foreign Exchange	1319999999
Total Return	1329999999
Other	1339999999
Subtotal – Other.....	1349999999

Total Swaps

Subtotal – Interest Rate	1359999999
Subtotal – Credit Default	1369999999
Subtotal – Foreign Exchange	1379999999
Subtotal – Total Return	1389999999
Subtotal – Other	1399999999
Subtotal – Total Swaps	1409999999

Forwards

Hedging Effective– Excluding Variable Annuity Guarantees Under SSAP No. 108.....	1419999999
Hedging Effective – Variable Annuity Guarantees Under SSAP No. 108.....	1429999999
Hedging Other.....	1439999999
Replication	1449999999
Income Generation	1459999999
Other.....	1469999999
Subtotal – Forwards	1479999999

SSAP No. 108 Adjustment

Offset to VM-21	1489999999
Recognized and Deferred Assets or Liabilities	1499999999
Subtotal – SSAP No. 108 Adjustments	1509999999

Totals:

Subtotal – Hedging Effective – Excluding Variable Annuity Guarantees Under SSAP No. 108	1689999999
Subtotal – Hedging Effective – Variable Annuity Guarantees Under SSAP No. 108.....	1699999999
Subtotal – Hedging Other.....	1709999999
Subtotal – Replication	1719999999
Subtotal – Income Generation	1729999999
Subtotal – Other	1739999999
Subtotal – Adjustments for SSAP No. 108 Derivatives	1749999999

Total (Sum of Lines 1689999999, 1699999999, 1709999999, 1719999999, 1729999999, 1739999999 and 1749999999).....	1759999999
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Definitions:

Hedging Effective – Excluding Variable Annuity Guarantees Under SSAP No. 108:

A derivative transaction that is used in hedging transactions that meet the criteria of a highly effective hedge as described in *SSAP No. 86—Derivatives*, which are valued and reported in a manner that is consistent with the hedged asset or liability. These transactions have been voluntarily designated and are effective as of the reporting date. Excludes derivative transactions that are used in hedging transactions for variable annuity guarantees under *SSAP No. 108—Derivative Hedging Variable Annuity Guarantees*.

Hedging Effective –Variable Annuity Guarantees Under SSAP No. 108:

A derivative relationship used in hedging transactions that meet the criteria of a highly effective hedge and applied the special accounting treatment described in *SSAP No. 108—Derivative Hedging Variable Annuity Guarantees*, which are reported at fair value pursuant to SSAP No. 108.

Hedging Other:

A derivative transaction that is used in a hedging transaction where the intent is for an economic reduction of one or more risk factors. This transaction is not part of an effectively designated relationship as described under *SSAP No. 86—Derivatives*.

Replication:

A derivative transaction entered into in conjunction with other investments in order to reproduce the investment characteristics of otherwise permissible investments as described under *SSAP No. 86—Derivatives*. A derivative transaction entered into by a reporting entity as a hedging or income generation transaction shall not be considered a replication (synthetic asset) transaction. These transactions are considered to be replications as of the reporting date.

Income Generation:

A derivative transaction written or sold to generate additional income or return to the reporting entity as described under *SSAP No. 86—Derivatives*.

Other:

A derivative transaction written or sold by the reporting entity used for means other than (1) Hedging Effective; (2) Hedging Other; (3) Replication; or (4) Income Generation (definitions listed above or referenced in *SSAP No. 86—Derivatives*). When this subcategory is utilized, a description of the use should be included in the footnotes to the financial statements.

Value of One (1) Point:

The monetary value of a one (1) point move in a futures position published by the exchange. May also be referred to as “Lot Size,” “Lots” or “Points” by the exchange.

Total Adjustments for SSAP No. 108 Derivatives

Amounts both the current year fair value fluctuations in the hedging instruments attributable to the hedged risk.

- 1) Recognized as realized gain or loss due to offset against current period changes in the designated portion of the VM-21 reserve liability and
- 2) Recognized as deferred assets or deferred liabilities as prescribed under SSAP No. 108.

Interest rate and currency swaps (where receive/(pay) notional amounts are denominated in different currencies), are filed under the “Foreign Exchange” swap subcategory.

SCHEDULE DB – PART A – SECTION 1

OPTIONS, CAPS, FLOORS, COLLARS, SWAPS AND FORWARDS OPEN
DECEMBER 31 OF CURRENT YEAR

Include all options, caps, floors, collars, swaps and forwards owned on December 31 of the current year, including those owned on December 31 of the previous year, and those acquired during the current year.

Column 1 – Description

Give a complete and accurate description of the derivative instrument including a description of the underlying securities, currencies, rates, indices, commodities, derivative instruments, or other financial market instruments.

Include details such as:

- For options, the basis. For example, caps should include the underlying interest rate (e.g., CMS 5 year) and frequency of the reset (typically three months);
- For credit default swaps, the name of the reference entity (single issuer or an index) and the equity ticker symbol, if available;
- For currency derivatives, report the currency and describe the pay/receive (or buy/sell) legs of the transaction; and
- For baskets, note that it is a basket and include the derivative equity tickers, if applicable.
- For derivatives with financing premiums, include information on the terms of the financing premium, including whether it is due periodically or at maturity, and the next payment date.

Where leveraging is a feature of the payment terms, the multiplier effect will be clearly presented in the description.

For swaptions, include the hedge # number, the tenor of the option (i.e., time from effective date to maturity date of the option respect), and the start and end dates of the underlying swap.

If traded on an exchange, disclose the ticker symbol. Indicate the maturity of the underlying, as appropriate.

Do not use internal descriptions or identifiers unless provided as supplemental information.

Column 2 – Description of Item(s) Hedged, Used for Income Generation or Replicated

Describe the assets or liabilities hedged, including CUSIP(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the CUSIP and a complete and accurate description of the bond; if multiple CUSIPs, note that there are multiple CUSIPs and report the equity ticker or name of the ultimate parent, as applicable.

If hedging a guaranteed investment contract or funding agreement, report as “GIC Hedge” or “FA Hedge.”

For a foreign operations hedge, report as “Net Investment in Foreign Operations.”

For annuity hedging, describe whether hedging fixed or variable annuities.

If hedging a specific mortgage loan asset, report as “Mortgage Loan” and provide the corresponding loan number reported on Schedule B, Part 1, Column 1.

Describe the assets against which derivatives are written in income-generation transactions.

If a replication, report the RSAT Number and Description of the RSAT (Columns 1 and 2 from Schedule DB, Part C, Section 1).

Column 3	<p>– Schedule/Exhibit Identifier</p> <p>Identify the Schedule or Exhibit of the hedged item(s), such as Schedule A, B, BA, D Part 1, D Part 2, Section 1; or D, Part 2, Section 2, if appropriate. Otherwise “N/A.”</p> <p>Use clear abbreviations for schedules, such as D 1 (Schedule D, Part 1) D 2-1 (Schedule D, Part 2, Section 1), D 2-2 (Schedule D, Part 2, Section 2), etc.</p>
Column 4	<p>– Type(s) of Risk(s)</p> <p>Identify the type(s) of risk(s) being hedged: “Interest Rate,” “Credit,” “Duration,” “Currency,” “Equity/Index,” “Commodity” or, if reporting other risks, provide a description of the risk within the field or in the footnote listed at the end of this section.</p> <p>If footnoted, please enter a reference code in this column (e.g., a, b, c, etc.) then disclose the description of the risk in Schedule DB footnotes for each reference code used in the schedule.</p> <p>In the event there is more than one type of risk, use the most relevant risk.</p>
Column 5	<p>– Exchange, Counterparty or Central Clearinghouse</p> <p>Show the name, followed by the Commodity Futures Trading Commission’s Legal Entity Identifier (LEI), if an LEI number has been assigned, of the exchange, counterparty or central clearinghouse.</p> <p>If exchange-traded, show the name and the LEI of the exchange, Board of Trade or contract market.</p> <p>If OTC traded, show the name and the LEI of counterparty and the guarantor upon whose credit the reporting entity relies.</p>
Column 6	<p>– Trade Date</p> <p>Show the trade date of the original transaction.</p> <p>The reporting entity may summarize on one line all identical derivative instruments with the same exchange or counterparty showing the last trade date, but only if the instruments are identical in their terms; e.g., type, maturity, expiration or settlement, and strike price, rate or index.</p>
Column 7	<p>– Date of Maturity or Expiration</p> <p>Show the date of maturity or expiration of the derivative, as appropriate.</p>
Column 8	<p>– Number of Contracts</p> <p>Show the number of contracts, as applicable (e.g., for exchange-traded derivatives) as an absolute (non-negative) value.</p>
Column 9	<p>– Notional Amount</p> <p>Show the notional amount. Notional amounts are to be reported as an absolute (non-negative) value. Guidance for determining notional is included in the Schedule DB General Instructions and <i>SSAP No. 86—Derivatives</i>.</p> <p>If the replication (synthetic asset) transactions are not denominated in U.S. dollar, convert it into U.S. dollar equivalent in accordance with <i>SSAP No. 23—Foreign Currency Transactions and Translations</i>.</p>

Column 10	<p>– Strike Price, Rate or Index Received (Paid)</p> <p>Show the strike price, rate or index for which payments are received (paid), or an option could be exercised or which would trigger a cash payment to (by) the reporting entity on a derivative.</p> <p>Forward exchange rate must be stated as: Fx Currency per US\$ (Fx/US\$).</p> <p>For credit derivatives, state “credit event” when the payment is triggered by a standard International Swaps and Derivatives Association (ISDA) defined credit event.</p> <p>Describe non-standard credit event in footnotes to the annual statement.</p> <p>For example, for a credit default swap sold at 0.50% per annum, show “0.50 / (credit event),” or for an interest swap with 4.5% received, LIBOR + 0.50% paid, show “4.50 / (L+0.50).”</p>
Column 11	<p>– Cumulative Prior Year(s) Initial Cost of Undiscounted Premium (Received) Paid</p> <p>For derivatives opened in prior reporting years, show the cumulative undiscounted, remaining premium or other payment (received) paid since the derivative contract was entered into.</p> <p>If a derivative has been partially terminated, the terminated portion of the premium is reported in Schedule DB, Part A, Section 2.</p>
Column 12	<p>– Current Year Initial Cost of Undiscounted Premium (Received) Paid</p> <p>For derivatives opened in the current reporting year, or for derivatives in which premiums are paid throughout the derivative contract, show the undiscounted premium or other payment (received) paid in the current year.</p>
Column 13	<p>– Current Year Income</p> <p>Show the amount of income (received) paid, on accrual basis, during the year (excluding the amount entered in Column 11).</p> <p>If such payments are both received and paid (e.g., interest swaps), show the net amount (excluding taxes).</p>
Column 14	<p>– Book/Adjusted Carrying Value</p> <p>Represents book/adjusted value with any nonadmitted assets added back.</p> <p>Refer to <i>SSAP No. 36—Derivatives</i> for further discussion.</p>
Column 15	<p>– Code</p> <p>Insert * in this column if the book/adjusted carrying value is combined with the book/adjusted carrying value of assets or liabilities hedged; the book/adjusted carrying value is combined with the book/adjusted carrying value of underlying/covering assets; or if the amount is combined with consideration paid on underlying/covering assets.</p> <p>Insert # in this column if the book/adjusted carrying value was combined in prior years with the book/adjusted carrying value of assets or liabilities hedged.</p> <p>Insert @ in this column if the income/expenses is combined with income/expenses on assets or liabilities hedged.</p> <p>Insert ^ in this column if the derivative has unpaid financing premiums.</p>

For Clearly Defined Hedging Strategy (CDHS) instruments applying the provisions of SSAP No. 108:

Insert \$ in this column for derivatives held in a SSAP No. 108 CDHS throughout the current reporting period (or since inception if shorter).

Insert & in this column for derivatives repurposed from a SSAP No. 108 CDHS to SSAP No. 86 during the current reporting period.

Insert ! in this column for derivatives previously held that were designated from SSAP No. 86 to a SSAP No. 108 CDHS during the current reporting period.

Insert ~ in this column for CDHS hedging instruments removed as a variable annuities derivative program was terminated.

Column 16 – Fair Value

See the Glossary of the NAIC *Accounting Practices and Procedures Manual* for a definition of fair value. For purposes of this column, fair value can be obtained from any one of these sources:

- A pricing service.
- An exchange.
- Broker or custodian quote.
- Determined by the reporting entity.

Column 17 – Unrealized Valuation Increase/(Decrease)

For purposes of this schedule, **increase** should be reported when the change results in an increase to the asset or a decrease to the liability. A **decrease** should be reported when the change results in a decrease to the asset or an increase to the liability.

The total unrealized valuation increase/(decrease) for a specific derivative will be the change in Book/Adjusted Carrying Value that is due to carrying or having carried (in the previous year) the derivative at Fair Value.

These amounts are to be reported as unrealized capital gains/(losses) in the Exhibit of Capital Gains/(Losses) and in the Capital and Surplus Account. For SSAP No. 108 Derivatives, the entire change in fair value shall be initially reported as an unrealized change, with adjustments shown to represent the amounts removed from unrealized and recognized as realized or deferred assets/liabilities under the provisions of SSAP No. 108. The Column 17 summary Total (i.e. Line 1759999999) should reflect only unrealized gains or losses remaining after the Total Adjustments for SSAP No. 108 Derivatives.

Column 18 – Total Foreign Exchange Change in Book/Adjusted Carrying Value

This is a positive or negative amount that is defined as the portion of the total change in Book/Adjusted Carrying Value for the year that is attributable to foreign exchange differences for a particular derivative.

The amounts reported in this column should be included as net unrealized foreign exchange capital gain/(loss) in the Capital and Surplus Account.

For purposes of this schedule, **positive amounts** should be reported when the change results in an increase to the asset or a decrease to the liability. A **negative amount** should be reported when the change results in a decrease to the asset or an increase to the liability.

Column 19 – Current Year's (Amortization)/Accretion

For purposes of this schedule, **positive amounts** should be reported when the change results in an increase to the asset or a decrease to the liability. A **negative amount** should be reported when the change results in a decrease to the asset or an increase to the liability.

Column 20 – Adjustment to the Carrying Value of Hedged Item

This represents the amortized book/adjusted carrying value used to adjust the basis of the hedged item(s) during the current year.

Column 21 – Potential Exposure

Potential Exposure is a statistically derived measure of the potential increase in derivative instrument risk exposure, for derivative instruments that generally do not have an initial cost paid or consideration received, resulting from future fluctuations in the underlying interests upon which derivative instruments are based.

For collars, swaps other than credit default swaps and forwards, the Potential Exposure = 0.5% x "Notional Amount" x Square Root of (Remaining Years to Maturity).

For credit default swaps, enter the larger of notional amount or maximum potential payment.

For purchased credit default swaps bought for protection, the amount reported will be zero.

If the maximum potential exposure cannot be determined, enter zero and explain in the Notes to Financial Statement.

Disclose in the footnotes to the annual statement any assets, held either as collateral or by third parties that the reporting entity can obtain and liquidate to recover all or a portion of the amounts paid under the derivative.

Column 22 – Credit Quality of Reference Entity

Only applies to credit default swaps; for other derivatives, leave blank)

Disclose:

- NAIC designation of the reference entity; or, if not available, then
- NAIC designation equivalent of the reference entity, if it is CRP rated; or, if not available, then
- The reporting entity's own credit assessment translated into an NAIC designation equivalent with a "*" to indicate that the designation is based on the reporting entity's own internal evaluation of the reference entity's creditworthiness.

For first-loss type of basket credit default swaps, use the lowest designation in the basket.

For other types of baskets, or other structures, determine a designation that fairly represents the likelihood of credit losses.

Column 23 – Hedge Effectiveness at Inception and at Year-end

For hedge transactions show as a percentage expressed as (XX / YY), where “XX” shows the hedge effectiveness percentage at inception and “YY” shows the hedge effectiveness percentage on December 31 of the current year.

For example, 100.45% hedge effectiveness at inception and 94.90% hedge effectiveness on December 31 of the current year is reported as “100 / 95.”

Round to the nearest whole percentage. Do not use decimals.

When hedge effectiveness cannot be calculated, enter a reference code number in this column (e.g., 0001, 0002, etc.) then disclose the financial or economic impact of the hedge at the end of the reporting period in Schedule DB footnotes for each reference code number used in the schedule.

A reference code number may be used multiple times in this column to indicate the same explanation.

For example:

0001	Reduces bond portfolio duration by .2 years.
0002	Instrument was repurposed from SSAP No. 108; CDHS #001; hedged interest rate risks of assets.
0003	Instrument in CDHS #001 Rider - Claims Less Rider Fees in VA Contracts – 50% of Rho SSAP 108 hedge 100% Effective.

a) Fair Value Hedges:

How much of the change in value of the hedged item(s) was hedged by the change in value of the derivative, both:

- At the inception of the derivative transaction.
- On December 31 at end of the current year.

b) Cash Flow Hedges:

How much of the change in cash flows or present value of cash flows of the hedged item(s) was hedged by the change in cash flows or present value of cash flows of the derivative, both:

- At the inception of the derivative transaction, and
- At the end of the current year.

**** Columns 24 through 32 will be electronic only. ****

Column 24 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Whenever possible, fair value should represent the amount of money the reporting entity would receive (pay) in order to close the derivative position at the market price. Fair value should only be determined analytically when the market price-based value cannot be obtained.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

“1” for Level 1

“2” for Level 2

“3” for Level 3

The following is a listing of the valid method indicators for derivatives to show the method used by the reporting entity to determine the Fair Value.

“a” For derivatives where the fair value is determined by a pricing service.

“b” For derivatives where the fair value is determined by a stock exchange.

“c” For derivatives where the fair value is determined by a broker or the reporting entity's custodian. To use this method 1) the broker must be approved by the reporting entity as a derivative counterparty; and 2) the reporting entity shall obtain and retain the pricing policy of the broker or custodian that provided the quotations.

“d” For derivatives where the fair value is determined by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

Column 25 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most stock exchange codes can be found in the **Investment Schedules General Instructions** or the following Web site:

www.fixprotocol.org/specifications/exchanges.shtml

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

Column 26 – Method of Clearing (C or U)

Indicate whether derivative transaction is cleared through a central clearinghouse with a “C” or not cleared through a centralized clearinghouse with a “U.”

Column 27 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any counterparty as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

****Columns 28 through 32 are for derivatives with financing premiums****

Column 28 – Total Undiscounted Premium Cost

Report the total, undiscounted (contractual) cost to acquire/enter into the derivative.

Column 29 – Unpaid Undiscounted Premium Cost

Report the undiscounted (contractual) cost to acquire/enter into the derivative unpaid by the reporting entity.

Column 30 – Fair Value of Derivative, Excluding Impact of Financing Premiums

Reflect the fair value of the derivative adjusted to exclude the impact of discounted future settled premiums. For example, if the fair value of the derivative reported in Column 16 has been reduced due to expected cash outflows representing the reporting entity's future payment of financing premiums, the consideration of those future premium cash outflows shall be removed from the reported fair value of the derivative captured in this column.

(At acquisition, a derivative may be reported with a net zero fair value in Column 16 as the value of the derivative and the net present value of future financing premiums owed from the acquisition of the derivative may offset. The fair value reported in Column 30 shall reflect the fair value of the derivative without an offset for the future financing premiums.)

Column 31 – Unrealized Valuation Increase/Decrease, Excluding Impact of Financing Premiums

Reflect the unrealized gain or unrealized loss reported for the derivative adjusted to exclude the impact from discounted future settled premiums. For example, if the valuation increase/valuation decrease reported in Column 17 includes "losses" to recognize the net present value of the financing cost owed by the reporting entity, those "losses" shall be removed from the unrealized valuation increase/decrease reflected in this column.

Column 32 – CDHS Identifier

Provide a unique identifier for each Clearly Defined Hedging Strategy (CDHS) applying the provisions of SCAP No. 108 reported on this schedule (e.g., 001, 002, etc.). This identifier will also be used for reporting of the CDHS in Column 1 of Schedule DB, Part E.

This column should only be used for the following line numbers:

Purchased Options	Lines 0089999999 through 0139999999
Written Options	Lines 0579999999 through 0629999999
Swaps	Lines 1059999999 through 1099999999
Forwards	Line 1429999999

SCHEDULE DB – PART A – SECTION 2

**OPTIONS, CAPS, FLOORS, COLLARS, SWAPS AND FORWARDS TERMINATED
DURING CURRENT YEAR**

Include all options, caps, floors, collars, swaps and forwards which were terminated during the current reporting year, both those that were owned on December 31 of the previous reporting year, and those acquired and terminated during the current year.

Column 1 – Description

Give a complete and accurate description of the derivative instrument including a description of the underlying securities, currencies, rates, indices, commodities, derivative instruments, or other financial market instruments.

Include details such as:

- For options, the basis. For example, caps should include the underlying interest rate (e.g. CMS 5 year) and frequency of the reset (typically three months);
- For credit default swaps, the name of the reference entity (a single issuer or an index) and the equity ticker symbol, if available;
- For currency derivatives, report the currency and describe the pay/receive (or buy/sell) legs of the transaction; and
- For baskets, note that it is a basket and include the top five equity tickers, if applicable.
- For derivatives with financing premiums include information on the terms of the financing premium, including whether it is due periodically or at maturity, and the next payment date.

Where leveraging is a feature of the payment terms, the multiplier effect will be clearly presented in the description.

If traded on an exchange disclose the ticker symbol. Indicate the maturity of the underlying, as appropriate.

Do not use internal descriptions or identifiers unless provided as supplemental information.

Column 2 – Description of Item(s) Hedged, Used for Income Generation, or Replicated

Describe the assets or liabilities hedged, including CUSIP(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAG/B Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.

If hedging a specific bond, report the CUSIP and a complete and accurate description of the bond; if multiple CUSIPs, note that there are multiple CUSIPs and report the equity ticker or name of the ultimate parent, as applicable.

If hedging a guaranteed investment contract or funding agreement, report as “GIC Hedge” or “FA Hedge.”

For a foreign operations hedge, report as “Net Investment in Foreign Operations.”

For annuity hedging, describe whether hedging fixed or variable annuities.

If hedging a specific mortgage loan asset, report as “Mortgage Loan” and provide the corresponding loan number reported on Schedule B, Part 1, Column 1.

Describe the assets against which derivatives are written in income-generation transactions.

If a replication, report the RSAT Number and Description of the RSAT (Columns 1 and 2 from Schedule DB, Part C, Section 1).

Column 3	<p>– Schedule/Exhibit Identifier</p> <p>Identify the Schedule or Exhibit of the hedged item(s), such as Schedule A; B; BA; D, Part 1; D, Part 2, Section 1; or D, Part 2, Section 2, if appropriate. Otherwise “N/A.”</p> <p>Use clear abbreviations for schedules, such as D 1 (Schedule D, Part 1) D 2-1 (Schedule D, Part 2, Section 1), D 2-2 (Schedule D, Part 2, Section 2), etc.</p>
Column 4	<p>– Type(s) of Risk(s)</p> <p>Identify the type(s) of risk(s) being hedged: “Interest Rate,” “Credit,” “Duration,” “Currency,” “Equity/Index,” “Commodity” or, if reporting other risks, provide a description of the risk within the field or in the footnote at the end of this section.</p> <p>If footnoted, please enter a reference code in this column (e.g., a, b, c, etc.) then disclose the description of the risk in Schedule DB footnotes for each reference code used in the schedule.</p> <p>In the event there is more than one type of risk, use the most relevant risk.</p>
Column 5	<p>– Exchange, Counterparty or Central Clearinghouse</p> <p>Show the name, followed by the Commodity Futures Trading Commission’s Legal Entity Identifier (LEI), if an LEI number has been assigned, for the exchange, counterparty or central clearinghouse.</p> <p>If exchange-traded, show the name and the LEI of the exchange, Board of Trade or contract market.</p> <p>If OTC traded, show the name and the LEI of the counterparty and the guarantor upon whose credit the reporting entity relies.</p>
Column 6	<p>– Trade Date</p> <p>Show the trade date of the original transaction.</p> <p>The reporting entity may summarize on one line all identical derivative instruments with the same exchange or counterparty showing the date of last trade date, but only if the instruments are identical in their terms (e.g., type, maturity, expiration or settlement, and strike price, rate or index).</p>
Column 7	<p>– Date of Maturity or Expiration</p> <p>Show the date of maturity or expiration of the derivative, as appropriate.</p>
Column 8	<p>– Termination Date</p> <p>Show the date on which the contract/agreement was terminated. Reporting entities may summarize on one line all identical instruments with the same exchange or counterparty, using the latest termination date, but only if the instruments are identical in their terms (e.g., type, maturity, expiration or settlement, and strike price, rate or index).</p>
Column 9	<p>– Indicate Exercise, Expiration, Maturity or Sale</p> <p>Indicate the cause of termination.</p>

Column 10	–	Number of Contracts
		Show the number of contracts, as applicable (e.g., for exchange-traded derivatives), as an absolute (non-negative) value.
Column 11	–	Notional Amount
		Show the notional amount. Notional amounts are to be reported as an absolute (non-negative) value. Guidance for determining notional is included in the Schedule DB General Instructions and <i>SSAP No. 86—Derivatives</i> .
		If the replication (synthetic asset) transaction is not denominated in U.S. dollars, convert it into U.S. dollar equivalent in accordance with <i>SSAP No. 23—Foreign Currency Transactions and Translations</i> .
Column 12	–	Strike Price, Rate or Index Received (Paid)
		Show the strike price, rate or index for which payments are received (paid), or an option could be exercised, which would trigger a cash payment to (by) the reporting entity, on a derivative.
		Forward exchange rate must be stated as: Fx Currency per US\$ (Fx/US\$).
Column 13	–	Cumulative Prior Year(s) Initial Cost of Undiscounted Premium (Received) Paid
		For derivatives opened in prior reporting years, show the cumulative, undiscounted, remaining premium or other payment (received) paid since the derivative contract was entered into.
Column 14	–	Current Year Initial Cost of Undiscounted Premium (Received) Paid
		For derivatives opened in the current reporting year, show the undiscounted premium or other payment (received) paid when the derivative contract was entered into.
Column 15	–	Consideration Received (Paid) on Termination
		Show the amount of consideration received (paid).
Column 16	–	Current Year Income
		Show the amount of income received (paid) accrued for the current year.
Column 17	–	Book/Adjusted Carrying Value
		Represents the statement value with any nonadmitted assets added back.
		Refer to <i>SSAP No. 86—Derivatives</i> for further discussion.

Column 18 – Code

Insert * in this column if the book/adjusted carrying value is combined with the book/adjusted carrying value of assets or liabilities hedged; if the book/adjusted carrying value is combined with the book/adjusted carrying value of underlying/covering assets; or if the amount is combined with consideration paid on underlying/covering assets.

Insert # in this column if the book/adjusted carrying value was combined in prior years with the book/adjusted carrying value of assets or liabilities hedged.

Insert @ in this column if the income/expenses is combined with income/expenses on assets or liabilities hedged.

Insert ^ in this column if the derivative has unpaid financing premiums.

For Clearly Defined Hedging Strategy (CDHS) instruments applying the provisions of SSAP No. 108:

Insert \$ in this column for derivatives held in a SSAP No. 108 CDHS throughout the current reporting period (or since inception if shorter).

Insert & in this column for derivatives repurposed from a SSAP No. 108 CDHS to SSAP No. 86 during the current reporting period.

Insert ! in this column for derivatives previously sold but were designated from SSAP No. 86 to a SSAP No. 108 CDHS during the current reporting period.

Insert ~ in this column for CDHS hedging instruments removed as the variable annuities derivative program was terminated.

Column 19 – Unrealized Valuation Increase/(Decrease)

For purposes of this schedule, **increases** should be reported when the change results in an increase to the asset or a decrease to the liability. A **decrease** should be reported when the change results in a decrease to the asset or an increase to the liability.

Column 20 – Total Foreign Exchange Change in Book/Adjusted Carrying Value

This is a positive or negative amount that is defined as the portion of the total change in Book/Adjusted Carrying Value for the year that is attributable to foreign exchange differences for a particular derivative.

The amounts reported in this column should be included as net unrealized foreign exchange capital gain/(loss) in the Capital and Surplus Account.

Column 21 – Current Year's (Amortization)/Accretion

For purposes of this schedule, **positive amounts** should be reported when the change results in an increase to the asset or a decrease to the liability. A **negative amount** should be reported when the change results in a decrease to the asset or an increase to the liability.

Column 22 – Gain (Loss) on Termination – Recognized

This represents gain (loss) on termination that is not deferred or used to adjust basis of hedged items.

This equals consideration received less book/adjusted carrying value at termination.

Column 23 – Adjustment to the Carrying Value of Hedged Item

This represents the gain (loss) on termination that was used to adjust the basis of a hedged item in the current year.

It includes the book/adjusted carrying value of premiums that were allocated to the purchase cost on exercise of an option.

Column 24 – Gain (Loss) on Termination – Deferred

This represents the gain (loss) on termination that was deferred over year-end.

This equals consideration received less book/adjusted carrying value at termination.

Column 25 – Hedge Effectiveness at Inception and at Termination

For hedge transactions show as a percentage expressed as (XX / YY), where “XX” shows the hedge effectiveness percentage at inception and “YY” shows the hedge effectiveness percentage at termination.

For example, 100.45% hedge effectiveness at inception and 94.90% hedge effectiveness on December 31 of the current year is reported as “100 / 95”.

Round to the nearest whole percentage. Do not use decimals.

When hedge effectiveness cannot be calculated, enter a reference code number in this column (e.g., 0001, 0002, etc.) then disclose the financial or economic impact of the hedge at the end of the reporting period in Schedule DB footnote for each reference code number used in the schedule.

A reference code number may be used multiple times in this column to indicate the same explanation.

For example: 0001 Reduces bond portfolio duration by .2 years.

0002 Instrument was repurposed from SSAP No. 108; CDHS #001; hedged interest rate risks of assets.

0003 Instrument in CDHS #001 Rider Claims Less Rider Fees in VA Contracts – 50% of Rho SSAP 108 hedge; 100% Effective.

a) Fair Value Hedges:

How much of the change in value of the hedged item(s) was hedged by the change in value of the derivative, both:

- At the inception of the derivative transaction; and
- At termination.

b) Cash Flow Hedges:

How much of the change in cash flows or present value of cash flows of the hedged item(s) was hedged by the change in cash flows or present value of cash flows of the derivative, both:

- At the inception of the derivative transaction; and
- At termination.

**** Column 26 through 31 will be electronic only. ****

Column 26 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any counterparty as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

****Columns 27 through 31 are for derivatives with financing premiums****

Column 27 – Total Undiscounted Premium Cost

Report the total, undiscounted (contractual) cost to acquire/enter into the derivative.

Column 28 – Unpaid Undiscounted Premium Cost

Report the undiscounted (contractual) cost to acquire/enter into the derivative unpaid by the reporting entity.

Column 29 – Fair Value of Derivative, Excluding Impact of Financing Premiums

Reflect the fair value of the derivative adjusted to exclude the impact of discounted future settled premiums. For example, if the fair value of the derivative reported in Column 16 has been reduced due to expected cash outflows representing the reporting entity's future payment of financing premiums, the consideration of those future premium cash outflows shall be removed from the reported fair value of the derivative captured in this column.

(At acquisition, a derivative may be reported with a net zero fair value in Column 16 as the value of the derivative and the net present value of future financing premiums owed from the acquisition of the derivative may offset. The fair value reported in Column 29 shall reflect the fair value of the derivative without an offset for the future financing premiums.)

Column 30 – Unrealized Valuation Increase/Decrease, Excluding Impact of Financing Premiums

Reflect the unrealized gain or unrealized loss reported for the derivative adjusted to exclude the impact from discounted future settled premiums. For example, if the valuation increase/valuation decrease reported in Column 17 includes "losses" to recognize the net present value of the financing cost owed by the reporting entity, those "losses" shall be removed from the unrealized valuation increase/decrease reflected in this column.

Column 31 – CDHS Identifier

Provide a unique identifier for each Clearly Defined Hedging Strategy (CDHS) applying the provisions of SSAI No. 108 reported on this schedule (e.g., 001, 002, etc.). This identifier will also be used for reporting of the CDHS in Column 1 of Schedule DB, Part E.

This column should only be used for the following line numbers:

Purchased Options	Lines 0089999999 through 0139999999
Written Options	Lines 0579999999 through 0629999999
Swaps	Lines 1059999999 through 1099999999
Forwards	Line 1429999999

SCHEDULE DB – PART B
SECTIONS 1 AND 2

GENERAL INSTRUCTIONS

In each Section, separate derivative instruments into the following categories:

<u>Category</u>	<u>Line Number</u>
Long Futures:	
Hedging Effective – Excluding Variable Annuity Guarantees Under SSAP No. 108.....	1519999999
Hedging Effective – Variable Annuity Guarantees Under SSAP No.108.....	1529999999
Hedging Other.....	1539999999
Replication.....	1549999999
Income Generation.....	1559999999
Other.....	1569999999
Subtotal – Long Futures.....	1579999999
Short Futures:	
Hedging Effective – Excluding Variable Annuity Guarantees Under SSAP No. 108.....	1589999999
Hedging Effective – Variable Annuity Guarantees Under SSAP No. 108.....	1599999999
Hedging Other.....	1609999999
Replication.....	1619999999
Income Generation.....	1629999999
Other.....	1639999999
Subtotal – Short Futures.....	1649999999
SSAP No. 108 Adjustments	
Offset to VM-21.....	1659999999
Recognized and Deferred Assets or Liabilities.....	1669999999
Subtotal – SSAP No. 108 Adjustments.....	1679999999
Totals:	
Subtotal – Hedging Effective – Excluding Variable Annuity Guarantees Under SSAP No. 108.....	1689999999
Subtotal – Hedging Effective – Variable Annuity Guarantees Under SSAP No. 108.....	1699999999
Subtotal – Hedging Other.....	1709999999
Subtotal – Replication.....	1719999999
Subtotal – Income Generation.....	1729999999
Subtotal – Other.....	1739999999
Subtotal – Adjustments for SSAP No. 108 Derivatives.....	1749999999
Total (Sum of Lines 1689999999, 1699999999, 1709999999, 1719999999, 1729999999, 1739999999 and 1749999999).....	1759999999

Definitions:

Hedging Effective – Excluding Variable Annuity Guarantees Under SSAP No. 108:

A derivative transaction that is used in hedging transactions that meet the criteria of a highly effective hedge as described in *SSAP No. 86—Derivatives*, which are valued and reported in a manner that is consistent with the hedged asset or liability. These transactions have been voluntarily designated and are effective as of the reporting date. Excludes derivative transactions that are used in hedging transactions for variable annuity guarantees under *SSAP No. 108—Derivative Hedging Variable Annuity Guarantees*.

Hedging Effective –Variable Annuity Guarantees Under SSAP No. 108:

A derivative relationship used in hedging transactions that meet the criteria of a highly effective hedge and applied the special accounting treatment described in *SSAP No. 108—Derivative Hedging Variable Annuity Guarantees*, which are reported at fair value pursuant to SSAP No. 108.

Hedging Other:

A derivative transaction that is used in a hedging transaction where the intent is for an economic reduction of one or more risk factors. This transaction is not part of an effectively designated relationship as described under *SSAP No. 86—Derivatives*.

Replication:

A derivative transaction entered into in conjunction with other investments in order to reproduce the investment characteristics of otherwise permissible investments described under *SSAP No. 86—Derivatives*. A derivative transaction entered into by a reporting entity as a hedging or income generation transaction shall not be considered a replication (synthetic asset) transaction. These transactions are considered to be replications as of the reporting date.

Income Generation:

A derivative transaction written or sold to generate additional income or return to the reporting entity as described under *SSAP No. 86—Derivatives*.

Other:

A derivative transaction written or sold by the reporting entity used for means other than (1) Hedging Effective, (2) Hedging Other, (3) Replication, or (4) Income Generation definition listed above or referenced in *SSAP No. 86—Derivatives*. When this subcategory is utilized, a description of the use should be included in the footnotes to the financial statements.

Total Adjustments for SSAP No. 108 Derivatives

Captures both the current year fair value fluctuations in the hedging instruments attributable to the hedged risk.

- 1) Recognized as realized gain or loss due to offset against current period changes in the designated portion of the VM-21 reserve liability and
- 2) Recognized as deferred assets or deferred liabilities as prescribed under SSAP No. 108.

SCHEDULE DB – PART B – SECTION 1

**FUTURES CONTRACTS OPEN
DECEMBER 31 OF CURRENT YEAR**

Include all futures contracts positions open December 31 of current year, including those which were open on December 31 of previous year, and those acquired during current year.

In the Broker Name/Net Cash Deposits footnote, list, in alphabetical sequence, brokers with whom cash deposits have been made, cumulative changes made to the deposits and the beginning and ending cash balances.

Column 1	–	Ticker Symbol
		If traded on an exchange, disclose the ticker symbol.
Column 2	–	Number of Contracts
		Show the total number of contracts open on Dec. 31 of the reporting year as absolute (non-negative) value.
Column 3	–	Notional Amount
		Show the total notional amount of the futures position as Dec. 31 of the reporting year as absolute (non-negative) value. Guidance for determining notional is included in the Schedule DB General Instructions and <i>SSAP No. 86—Derivatives</i> .
Column 4	–	Description
		Give a complete and accurate description of the derivative instrument, including a description of the underlying securities, currencies, rates, indices, commodities, derivative instruments or other financial market instruments.
		For derivatives with financing premiums, include information on the terms of the financing premium, including whether it is due periodically or at maturity, and the next payment date.
		Do not use internal descriptions or identifiers unless provided as supplemental information.
Column 5	–	Description of Item(s) Hedged, Used for Income Generation, or Replicated
		Describe the assets or liabilities hedged, including CUSIP(s) when appropriate. For example, “Bond Portfolio Hedge,” “VAGLB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.
		If hedging a specific bond, report the CUSIP and a complete and accurate description of the bond; if multiple CUSIPs, note that there are multiple CUSIPs and report the equity ticker or name of the ultimate parent, as applicable.
		If hedging a guaranteed investment contract or funding agreement, report as “GIC Hedge” or “FA Hedge.”
		For a foreign operations hedge, report as “Net Investment in Foreign Operations.” For annuity hedging, describe whether hedging fixed or variable annuities.
		If hedging a specific mortgage loan asset, report as “Mortgage Loan” and provide the corresponding loan number reported on Schedule B, Part 1, Column 1.
		Describe the assets against which derivatives are written in income generation transactions.
		If a replication, report the RSAT Number and Description of the RSAT (Columns 1 and 2 from Schedule DB, Part C, Section 1).

Column 6	–	<p>Schedule/Exhibit Identifier</p> <p>Identify the Schedule or Exhibit of the hedged item(s), such as Schedule A; B; BA; D Part 1; D, Part 2 Section 1; or D, Part 2, Section 2, if appropriate. Otherwise "N/A."</p> <p>Use clear abbreviations for schedules, such as D 1 (Schedule D, Part 1) D 2-1 (Schedule D, Part 2, Section 1), D 2-2 (Schedule D, Part 2, Section 2), etc.</p>
Column 7	–	<p>Type(s) of Risk(s)</p> <p>Identify the type(s) of risk(s) being hedged: "Interest Rate," "Credit," "Duration," "Currency," "Equity/Index," "Commodity" or, if reporting other risks, provide a description of the risk within the field or in a footnote listed in this Schedule.</p> <p>If footnoted, please enter a reference code in this column (e.g., a, b, c, etc.) then disclose the description of the risk in Schedule DB footnotes for each reference code used in the schedule.</p> <p>In the event there is more than one type of risk, use the most relevant risk.</p>
Column 8	–	<p>Date of Maturity or Expiration</p> <p>Show the date of maturity or expiration of the derivative, as appropriate.</p>
Column 9	–	<p>Exchange</p> <p>Show the name and the Commodity Futures Trading Commission's Legal Entity Identifier (LEI), if an LEI number has been assigned, for the exchange in which the contract was transacted.</p>
Column 10	–	<p>Trade Date</p> <p>Show the trade date of the original transaction.</p> <p>The reporting entity may summarize in one line all identical derivative instruments with the same exchange or counterparty showing the last trade date, but only if the instruments are identical in their terms (e.g., type, maturity, expiration or settlement, and strike price, rate or index).</p>
Column 11	–	<p>Transaction Price</p> <p>Show the price at which the futures contract was originally purchased or sold.</p> <p>If several positions of the same futures contract are summarized, show the weighted average price.</p>
Column 12	–	<p>Reporting Date Price</p> <p>Show the reporting date closing price. Report price as published by the exchange.</p>
Column 13	–	<p>Fair Value</p> <p>Report the net unsettled futures position from the time lag (typically one day with U.S. futures brokers) between the change in the cumulative variation margin (Columns 15 and 18) and the actual settlement with the futures brokers.</p> <p>This represents the pending cash settlement of the futures position.</p>

Column 14	–	Book/Adjusted Carrying Value
		Represents the statement value of the futures position, with any nonadmitted assets added back, and is determined based on how the futures contract is being used, in accordance with <i>SSAP No. 86—Derivatives</i> .
		Note that any cash deposits placed with the broker are included in the Broker Name/Net Cash Deposits footnote only and not in the Book/Adjusted Carrying Value.
Column 15	–	Highly Effective Hedges – Cumulative Variation Margin
		On long contracts, show the number of contracts (Column 2) times the difference between the reporting date price (Column 12) and transaction price (Column 11) times the futures value of one (1) point (Column 22).
		On short contracts, show the number of contracts (Column 2) times the difference between the transaction price (Column 11) and the reporting date price (Column 12) times the futures value of one (1) point (Column 22).
		An exception is that this column would not be populated for highly effective futures of forecasted transaction or firm commitments.
Column 16	–	Highly Effective Hedges – Deferred Variation Margin
		This represents the variation margin that has been deferred and therefore not recognized as an unrealized or realized gain (loss) or as investment income.
		Note: If the entire amount of the variation margin was deferred, the amount reported will be the same as is reported in Column 15.
Column 17	–	Highly Effective Hedges – Change in Variation Margin Gain (Loss) Used to Adjust Basis of Hedged Item
		This represents the variation margin used in the current year to adjust the basis of a hedged item.
Column 18	–	Cumulative Variation Margin for All Other Hedges
		On long contracts, show the number of contracts (Column 2) times the difference between the reporting date price (Column 12) and transaction price (Column 11) times the futures value of one (1) point (Column 22).
		On short contracts, show the number of contracts (Column 2) times the difference between the transaction price (Column 11) and the reporting date price (Column 12) times the futures value of one (1) point (Column 22).
Column 19	–	Change in Variation Margin Gain (Loss) Recognized in Current Year
		This represents the variation margin recognized as an unrealized or realized gain (loss) or as investment income for the year.
		This column will be populated for highly effective futures hedging at fair value and All Other futures.
		This column will not be populated for highly effective futures hedging at amortized cost.

Column 20 – Potential Exposure

Potential Exposure is a statistically derived measure of the potential increase in derivative instrument risk exposure, for derivative instruments that generally do not have an initial cost paid or consideration received, resulting from future fluctuations in the underlying interests upon which derivative instruments are based.

For futures, the Potential Exposure = (Initial Margin per contract on the valuation date, set by the exchange on which contract trades) x (the number of contracts open on the valuation date).

Column 21 – Hedge Effectiveness at Inception and at Year-end

For hedge transactions show, as a percentage expressed as (XX / YY), where “XX” shows the hedge effectiveness percentage at inception and “YY” shows the hedge effectiveness percentage at reporting date.

For example, 100.45% hedge effectiveness at inception and 94.90% hedge effectiveness on December 31 of the current year is reported as “100 / 95.”

Round to the nearest whole percentage. Do not use decimals.

When hedge effectiveness cannot be calculated, enter a reference code number in this column (e.g., 0001, 0002, etc.) then disclose the financial or economic impact of the hedge at the end of the reporting period in Schedule DB footnotes for each reference code number used in the schedule.

A reference code number may be used multiple times in this column to indicate the same explanation.

For example: 0001 Reduces bond portfolio duration by .2 years.

0002 Instrument was reposed from SSAP No. 108; CDHS #001; hedged interest rate risk of assets.

0003 Instrument is CDHS #001 Rider Claims Less Rider Fees in VA Contracts – 50% of ER; SSAP 108 hedge; 100% Effective.

a) Fair Value Hedges:

How much of the change in value of the hedged item(s) was hedged by the change in value of the derivative, both:

- At the inception of the derivative transaction; and
- At reporting date.

b) Cash Flow Hedges:

How much of the change in cash flows or present value of cash flows of the hedged item(s) was hedged by the change in cash flows or present value of cash flows of the derivative, both:

- At the inception of the derivative transaction; and
- At reporting date.

Column 22 – Value of One (1) Point

This represents the monetary value of a one (1) point move in a futures position published by the exchange. This monetary value of one (1) point is utilized in the calculation of the futures' variation margin.

**** Columns 23 through 30 will be electronic only. ****

Column 23 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Whenever possible, fair value should represent the price at which the security could be sold, based on market information. Fair value should only be determined analytically when the market-based value cannot be obtained.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

“1” for Level 1

“2” for Level 2

“3” for Level 3

The following is a listing of the valid method indicators for derivatives to show the method used by the reporting entity to determine the Rate Used to Obtain Fair Value.

“a” for securities where the rate is determined by a pricing service.

“b” for securities where the rate is determined by a stock exchange.

“c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued.

“d” for securities where the rate is determined by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

Column 24 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most stock exchange codes can be found in the Investment Schedules General Instructions or the following Web address:

www.fixprotocol.org/specifications/exchanges.shtml

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

Column 25 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any counterparty as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

****Columns 26 through 30 are for derivatives with financing premiums****

Column 26 – Total Undiscounted Premium Cost

Report the total, undiscounted (contractual) cost to acquire/enter into the derivative.

Column 27 – Unpaid Undiscounted Premium Cost

Report the undiscounted (contractual) cost to acquire/enter into the derivative unpaid by the reporting entity.

Column 28 – Fair Value of Derivative, Excluding Impact of Financing Premiums

Reflect the fair value of the derivative adjusted to exclude the impact of discounted future settled premiums. For example, if the fair value of the derivative reported in Column 16 has been reduced due to expected cash outflows representing the reporting entity's future payment of financing premiums, the consideration of those future premium cash outflows shall be removed from the reported fair value of the derivative captured in this column.

(At acquisition, a derivative may be reported with a net zero fair value in Column 16 as the value of the derivative and the net present value of future financing premiums owed from the acquisition of the derivative may offset. The fair value reported in Column 28 shall reflect the fair value of the derivative without an offset for the future financing premiums.)

Column 29 – Unrealized Valuation Increase/Decrease, Excluding Impact of Financing Premiums

Reflect the unrealized gain or unrealized loss reported for the derivative adjusted to exclude the impact from discounted future settled premiums. For example, if the valuation increase/valuation decrease reported in Column 17 includes "losses" to recognize the net present value of the financing cost owed by the reporting entity, those "losses" shall be removed from the unrealized valuation increase/decrease reflected in this column.

Column 30 – CDHS Identifier

Provide a unique identifier for each Clearly Defined Hedging Strategy (CDHS) applying the provisions of SCAP No. 108 reported on this schedule (e.g., 001, 002, etc.). This identifier will also be used for reporting of the CDHS in Column 1 of Schedule DB, Part E.

This column should only be used for the following line numbers:

Long Futures	Line 1529999999
Short Futures	Line 1599999999

SCHEDULE DB – PART B – SECTION 2

**FUTURES CONTRACTS TERMINATED
DURING CURRENT YEAR**

Include all futures contracts which were terminated during current reporting year, both those that were open on December 31 of previous reporting year, and those acquired and terminated during current year.

Column 1	–	Ticker Symbol
		If traded on an exchange, disclose the ticker symbol.
Column 2	–	Number of Contracts
		The number of futures contracts terminated during the current year as absolute (non-negative) value.
Column 3	–	Notional Amount
		Show the total notional amount of the futures position terminated during the current year as absolute (non-negative) value. Guidance for determining notional is included in the Schedule DB General Instructions and <i>SSAP No. 86—Derivatives</i> .
Column 4	–	Description
		Give a complete and accurate description of the derivative instrument, including a description of the underlying securities, currencies, rates, indices, commodities, derivative instruments or other financial market instruments.
		For derivatives with financing premiums, include information on the terms of the financing premium, including whether it is due periodically or at maturity, and the next payment date.
		Do not use internal descriptions or identifiers unless provided as supplemental information.
Column 5	–	Description of Item(s) Hedged, Used for Income Generation, or Replicated
		Describe the assets or liabilities hedged, including CUSIP(s) when appropriate. For example, “Bond Portfolio Hedge,” “VA/ILB Hedge,” “Fixed Annuity Hedge,” “Investment in Foreign Operations,” etc.
		If hedging a specific bond, report the CUSIP and a complete and accurate description of the bond; if multiple CUSIPs, note that there are multiple CUSIPs and report the equity ticker or name of the ultimate parent, as applicable.
		If hedging a guaranteed investment contract or funding agreement, report as “GIC Hedge” or “FA Hedge.”
		If hedging a specific mortgage loan asset, report as “Mortgage Loan” and provide the corresponding loan number reported on Schedule B, Part 1, Column 1.
		Describe the assets against which derivatives are written in income generation transactions.
		If a replication, report the RSAT Number and Description of the RSAT (Columns 1 and 2 from Schedule DB, Part C, Section 1).
Column 6	–	Schedule/Exhibit Identifier
		Identify the Schedule or Exhibit of the hedged item(s), such as Schedule A; B; BA; D, Part 1; D, Part 2, Section 1; or D, Part 2, Section 2, if appropriate. Otherwise “N/A.”
		Use clear abbreviations for schedules, such as D 1 (Schedule D, Part 1) D 2-1 (Schedule D, Part 2, Section 1), D 2-2 (Schedule D, Part 2, Section 2), etc.

Column 7	–	<p>Type(s) of Risk(s)</p> <p>Identify the type(s) of risk(s) being hedged: "Interest Rate," "Credit," "Duration," "Currency," "Equity/Index," "Commodity" or, if reporting other risks, provide a description of the risk within the field or in a footnote listed in this Schedule.</p> <p>If footnoted, please enter a reference code in this column (e.g., a, b, c, etc.) then disclose the description of the risk in Schedule DB footnotes for each reference code used in the schedule.</p> <p>In the event there is more than one type of risk, use the most relevant risk.</p>
Column 8	–	<p>Date of Maturity or Expiration</p> <p>Show the date of maturity or expiration of the derivative, as appropriate.</p>
Column 9	–	<p>Exchange</p> <p>Show the name and the Commodity Futures Trading Commission's Legal Entity Identifier (LEI), if an LEI number has been assigned, for the exchange on which the contract was transacted.</p>
Column 10	–	<p>Trade Date</p> <p>Show the trade date of the original transaction.</p> <p>The reporting entity may summarize on one line all identical derivative instruments with the same exchange or counterparty showing the last trade date, but only if the instruments are identical in their terms (e.g., type, maturity, expiration or settlement, and strike price, rate or index).</p>
Column 11	–	<p>Transaction Price</p> <p>Show the original transaction price (the price at which the futures were purchased or sold).</p> <p>If several positions of the same futures contract are summarized, show the weighted average price.</p>
Column 12	–	<p>Termination Date</p> <p>Show the date when the derivative position was terminated.</p> <p>The reporting entity may summarize on one line all identical instruments with the same exchange or counterparty using the latest termination date.</p>
Column 13	–	<p>Termination Price</p> <p>The price at which the position was closed.</p>
Column 14	–	<p>Indicate Exercise, Expiration, Maturity or Sale</p> <p>Indicate the cause of termination.</p>
Column 15	–	<p>Cumulative Variation Margin at Termination</p> <p>On long contracts, show the number of contracts (Column 2) times the difference between the termination price (Column 13) and transaction price (Column 11) times the futures value of one (1) point (Column 20).</p> <p>On short contracts, show the number of contracts (Column 2) times the difference between the transaction price (Column 11) and the termination price (Column 13) times the futures value of one (1) point (Column 20).</p>

Column 16 – Change in Variation Margin Gain (Loss) Recognized in Current Year

This represents the variation margin recognized as realized gains (losses), or as investment income in the current year.

Column 17 – Change in Variation Margin Gain (Loss) Used to Adjust Basis of Hedged Item in Current Year

This represents the amount of gains (losses) used to adjust the basis of a hedged item in the current year.

Column 18 – Change in Variation Margin Deferred

This represents the variation margin that has been deferred and, therefore, not recognized as an unrealized or realized gain (loss) or as investment income.

Column 19 – Hedge Effectiveness at Inception and at Termination

For hedge transactions, show as a percentage expressed as (XX / YY), where “XX” shows the hedge effectiveness percentage at inception and “YY” shows the hedge effectiveness percentage at termination.

For example, 100.45% hedge effectiveness at inception and 94.90% hedge effectiveness on December 31 of the current year is reported as “100 / 95”.

Round to the nearest whole percentage. Do not use decimals.

When hedge effectiveness cannot be calculated, enter a reference code number in this column (e.g., 0001, 0002, etc.) then disclose the financial or economic impact of the hedge at the end of the reporting period in Schedule DB footnotes for each reference code number used in the schedule.

A reference code number may be used multiple times in this column to indicate the same explanation.

For example: 0001 Reduces bond portfolio duration by .2 years.

0002 Instrument was repurposed from SSAP No. 108; CDHS #001; hedged interest rate risks of assets.

0003 Instrument in CDHS #001 Rider Claims Less Rider Fees in VA Contracts – 50% of Rho SSAP 108 hedge; 100% Effective.

a) Fair Value Hedges:

How much of the change in value of the hedged item(s) was hedged by the change in value of the derivative, both:

- At the inception of the derivative transaction; and
- At termination.

b) Cash Flow Hedges:

How much of the change in cash flows or present value of cash flows of the hedged item(s) was hedged by the change in cash flows or present value of cash flows of the derivative, both:

- At the inception of the derivative transaction; and
- At termination.

Column 20 – Value of One (1) Point

This represents the monetary value of a one (1) point move in a futures position published by the exchange.

This monetary value of one (1) point is utilized in the calculation of the futures' variation margin.

**** Column 21 through 26 will be electronic only. ****

Column 21 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any counterparty as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

****Columns 22 through 26 are for derivatives with financing premiums****

Column 22 – Total Undiscounted Premium Cost

Report the total, undiscounted (contractual) cost to acquire/enter into the derivative.

Column 23 – Unpaid Undiscounted Premium Cost

Report the undiscounted (contractual) cost to acquire/enter into the derivative unpaid by the reporting entity.

Column 24 – Fair Value of Derivative, Excluding Impact of Financing Premiums

Reflect the fair value of the derivative adjusted to exclude the impact of discounted future settled premiums. For example, if the fair value of the derivative reported in column 16 has been reduced due to expected cash outflows representing the reporting entity's future payment of financing premiums, the consideration of those future premium cash outflows shall be removed from the reported fair value of the derivative captured in this column.

(At acquisition, a derivative may be reported with a net zero fair value in column 16 as the value of the derivative and the net present value of future financing premiums owed from the acquisition of the derivative may offset. The fair value reported in column 30 shall reflect the fair value of the derivative without an offset for the future financing premiums.)

Column 25 – Unrealized Variation Increase/Decrease, Excluding Impact of Financing Premiums

Reflect the unrealized gain or unrealized loss reported for the derivative adjusted to exclude the impact from discounted future settled premiums. For example, if the valuation increase/valuation decrease reported in column 17 includes "losses" to recognize the net present value of the financing cost owed by the reporting entity, those "losses" shall be removed from the unrealized valuation increase/decrease reflected in this column.

Column 26 – CDHS Identifier

Provide a unique identifier for each Clearly Defined Hedging Strategy (CDHS) applying the provisions of SSAP No. 108 reported on this schedule (e.g., 001, 002, etc.). This identifier will also be used for reporting of the CDHS in Column 1 of Schedule DB, Part E.

This column should only be used for the following line numbers:

Long Futures	Line 1529999999
Short Futures	Line 1599999999

SCHEDULE DB – PART D – SECTION 1

**COUNTERPARTY EXPOSURE FOR DERIVATIVE INSTRUMENTS OPEN
DECEMBER 31 OF CURRENT YEAR**

Counterparty Exposure to any one counterparty is the exposure to credit risk associated with the use of derivative instruments with that counterparty. This section displays the Book/Adjusted Carrying Value exposure and Fair Value exposure to each counterparty, net of collateral. Also displayed is the total potential exposure for each counterparty for Schedule DB, Parts A and B.

On the first line, show the aggregate sum for exchange traded derivatives, also known as listed derivatives or futures (Line 0199999999). (Exchange-Traded Derivatives are executed over a centralized trading venue known as an exchange and then booked with a central counterparty known as a clearing house.)

On the next six lines, show separately six groups of OTC (over-the-counter) derivative counterparties by NAIC Designation (Lines 0299999999 through 0799999999).

Then show the aggregate sum for centrally cleared derivatives (Line 0899999999). This line is used to show centrally cleared derivatives that are not considered exchange-traded.

The final line will show a total of all derivatives listed in the lines above (Line 0999999999).

Within each group, list the counterparties or central clearinghouses in alphabetical order.

For each counterparty with a master agreement, show on a second line (if applicable) totals for derivative instruments not covered by the master agreement.

Use additional lines, as needed, if multiple master agreements with the counterparty exist that do not provide for netting of offsetting amounts by the reporting entity against the counterparty upon termination in the event that the counterparty defaults.

Show subtotals for each group.

If a reporting entity has any detail lines reported for any of the following required groups, it shall report the subtotal amount of the corresponding group with the specified subtotal line number appearing in the same manner and location as the pre-printed total.

Aggregate Sum of Exchange-Traded Derivatives.....	0199999999
Over-The-Counter	
Total NAIC 1 Designation.....	0299999999
Total NAIC 2 Designation.....	0399999999
Total NAIC 3 Designation.....	0499999999
Total NAIC 4 Designation.....	0599999999
Total NAIC 5 Designation.....	0699999999
Total NAIC 6 Designation.....	0799999999
Aggregate Sum of Central Clearinghouses (Excluding Exchange-Traded).....	0899999999
Total (Sum of 0199999999, 0299999999, 0399999999, 0499999999, 0599999999, 0699999999, 0799999999 and 0899999999).....	0999999999

Column 1 – Description of Exchange, Counterparty or Central Clearinghouse

The first line (Line 0199999999) for the Aggregate Sum of Exchange-Traded Derivatives should be left blank.

On subsequent lines, show the name and the Commodity Futures Trading Commission's Legal Entity Identifier (LEI), if an LEI number has been assigned, for the counterparty or central clearinghouse.

Include the name and the LEI of the central clearinghouse and the derivatives clearing member, where appropriate.

Column 2 – Master Agreement (Y or N)

The lines for the Aggregate Sum of Exchange-Traded Derivatives (Line 0199999999) and for the Aggregate Sum of Central Clearinghouses (Line 0899999999) should be left blank.

For OTC counterparties, indicate "Y" if:

1. The reporting entity has a written International Swaps and Derivatives Association (ISDA) master agreement with the counterparty that provides for the netting of offsetting amounts by the reporting entity against the counterparty upon termination in the event that the counterparty defaults, or if such netting provisions of an ISDA master agreement are either incorporated by reference in transaction confirmations or are otherwise contractual provisions to which derivative instrument confirmations with the counterparty are subject, or if the reporting entity has a written non-ISDA master agreement with the counterparty that provides for the netting of offsetting amounts or the right of offset by the reporting entity against the counterparty upon termination in the event that the counterparty defaults; and
2. The domiciliary jurisdiction of such counterparty is either within the United States or if not within the United States, is within a foreign (non-United States) jurisdiction listed in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* as eligible for netting.

Column 3 – Credit Support Annex (Y or N)

The lines for the Aggregate Sum of Exchange-Traded Derivatives (Line 0199999999) and for the Aggregate Sum of Central Clearinghouses (Line 0899999999) should be left blank.

For OTC counterparties, indicate "Y" if:

The reporting entity has an additional annex to the International Swaps and Derivatives Association (ISDA) master agreement called a Credit Support Annex (CSA). The CSA agreement with the counterparty provides functionality of collateral postings against net counterparty exposure in excess of a threshold amount. This limits the net exposure the reporting entity has to a derivative counterparty in the event of a counterparty default.

Column 4 – Fair Value of Acceptable Collateral

Leave blank for the aggregate reporting of Exchange-Traded Derivatives (Line 0199999999).

For OTC counterparties, show the Fair Value of acceptable collateral pledged by the counterparty.

For central clearinghouses, this amount would be the net positive variation margin received by the reporting entity.

“Acceptable collateral” means cash, cash equivalents, securities issued or guaranteed by the United States or Canadian governments or their government-sponsored enterprises, letters of credit, publicly traded obligations designated 1 by the SVO, government money market mutual funds, and such other items as may be defined as acceptable collateral in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office*. For purposes of this definition, the term “letter of credit” means a clean, irrevocable and unconditional letter of credit issued or confirmed by, and payable and presentable at, a financial institution on the list of financial institutions meeting the standards for issuing such letter of credit published pursuant to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office*. The letter of credit must have an expiration date beyond the term of the subject transaction.

For Columns 5 and 6, Book/Adjusted Carrying Values that are debit balances on the balance sheet are positive numbers; those that are credit balances are negative numbers.

- Column 5 – Contracts with Book/Adjusted Carrying Value > 0 (i.e., debit balance on balance sheet)
- On the first line, show the aggregate sum for exchange traded derivatives that have a positive Book/Adjusted Carrying Value.
- For futures, this equals the sum of the positive cumulative variation margin for highly effective futures (Part B, Section 1, Column 15), plus the sum of the ending balance of all cash deposits with brokers (Part B, Section 1, Broker Name/Net Cash Deposits Footnote – Ending Cash Balance).
- On subsequent lines, show the sum of the Book/Adjusted Carrying Values of all derivative instruments with the counterparty or central clearinghouse that have a positive statement value.
- Column 6 – Contracts with Book/Adjusted Carrying Value < 0 (i.e., credit balance on balance sheet)
- On the first line, show the sum of the statement values in parentheses () of all exchange traded derivatives that have a negative Book/Adjusted Carrying Value.
- For futures, this equals the sum of the negative cumulative variation margin for highly effective futures (Part B, Section 1, Column 15).
- On subsequent lines, show the sum of the Book/Adjusted Carrying Values in parentheses () of all derivative instruments with the counterparty or central clearinghouse that have a negative Book/Adjusted Carrying Value.
- Column 7 – Exposure Net of Collateral (Book/Adjusted Carrying Value)
- For the aggregate reporting of Exchange-Traded Derivatives (Line 0199999999), show the amount in Column 5.
- For OTC counterparties, if no master agreement is in place, show the sum of the Book/Adjusted Carrying Values of all derivative instruments with the counterparty that has a positive Book/Adjusted Carrying Value, less any Acceptable Collateral (Column 5 – Column 4).
- For OTC counterparties with a master agreement in place and central clearinghouses, show the net sum of the Book/Adjusted Carrying Values of all derivative instruments, less any acceptable collateral (Column 5 + Column 6 – Column 4).
- This amount should not be less than zero.

For Columns 8 and 9, market values that would be debit balances on the balance sheet are positive numbers; those that would be credit balances are negative numbers.

- Column 8 – Contracts with Fair Value > 0 (i.e., debit balance on the balance sheet)
- Show the sum of the market values of all derivative instruments that have a positive market value.
- Column 9 – Contracts with Fair Value < 0 (i.e., credit balance on the balance sheet)
- Show the sum of the market values in parentheses () of all derivative instruments that have a negative market value.
- Column 10 – Exposure Net of Collateral (Fair Value)
- For the aggregate reporting of Exchange-Traded Derivatives (Line 0199999999), show the amounts in Column 8.
- For OTC counterparties, if no master agreement is in place, show the sum of the market values of all derivative instruments with the counterparty that has a positive market value, less any acceptable collateral (Column 8 – Column 4).
- For OTC counterparties with a master agreement in place, exchange-traded derivatives and central clearinghouses show the net sum of the market values of all derivative instruments, less any acceptable collateral (Column 8 + Column 9 – Column 4).
- This amount should not be less than zero.
- Column 11 – Potential Exposure
- Show the potential exposure for Parts A and B for Exchange-Traded Derivatives in aggregate (Line 0199999999) and for each OTC counterparty and central clearinghouse.
- Column 12 – Off-Balance Sheet Exposure
- For Exchange-Traded Derivatives (line 0199999999), show Column 11.
- For central clearinghouse:
- Show [Column 5 + Column 6 – Column 4 + Column 11] – Column 7 but not less than zero.
- For OTC counterparties:
- If Column 2 = yes; show [Column 5 + Column 6 – Column 4 + Column 11] – Column 7 but not less than zero.
- If Column 2 = no; show Column 11.
- Optional: If there is no master netting agreement, companies may still encounter double-counting in cases where a premium is received for an off-balance sheet derivative transaction, such as an interest rate swap. In such cases, report “no” in Column 2 and calculate off-balance sheet exposure on a contract-by-contract basis using the first formula.

**** Column 13 will be electronic only. ****

Column 13 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any counterparty as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

Not for Distribution

SCHEDULE DB – PART D – SECTION 2

**COLLATERAL FOR DERIVATIVE INSTRUMENTS OPEN
DECEMBER 31 OF CURRENT YEAR**

Under derivative contracts, collateral may be pledged to exchanges, counterparties, clearing brokers or central clearinghouses by the reporting entity as well as pledged by the exchanges, counterparties, clearing brokers or central clearinghouses to the reporting entity. This section displays the collateral pledged by the reporting entity in the first table and the collateral pledged to the reporting entity in the second table.

Each exchange, counterparty, derivatives clearing member or central clearinghouse may be listed more than once in each of the tables. For example, if initial and variation margin are posted at the same exchange; if more than one type of security is pledged to the same counterparty; if more than one corporate bond is pledged by a central clearinghouse; or if more than one

Total Collateral Pledged by Reporting Entity.....0199999999
Total Collateral Pledged to Reporting Entity.....0299999999

- Column 1 – Exchange, Counterparty or Central Clearinghouse
- Show the name and the Commodity Futures Trading Commission’s Legal Entity Identifier (LEI), if an LEI number has been assigned, for the exchange, Board of Trade, contract market, counterparty, derivatives clearing member or central clearinghouse that is holding collateral pledged by the reporting entity or that has pledged collateral to the reporting entity.
- Column 2 – Type of Asset Pledged
- Describe the type of asset pledged or received as collateral. For example, “Cash,” “Treasury,” “Corporate,” “Municipal,” “Loan-backed and Structured,” “Mortgage” and “Other.”
- Column 3 – CUSIP Identification
- Enter the CUSIP/PPN/CINS number of the asset pledged or received as collateral, when appropriate. If no CUSIP/PPN/CINS number exists, the field should be zero-filled.
- Column 4 – Description
- Give a complete and accurate description of the asset pledged or received as collateral, including coupon, when appropriate.
- Column 5 – Fair Value
- Enter the fair value of the asset. Refer to *SSAP No. 100R—Fair Value* for further discussion.
- Column 6 – Par Value
- Enter the par value of the asset adjusted for repayment of principal.

Column 7 – Book/Adjusted Carrying Value

Report the amortized value or the lower of amortized value or fair value, depending on the designation of the asset (and adjusted for any other-than-temporary impairment), as of the end of the current reporting year.

Include: The original cost of acquiring the asset, including brokerage and other related fees.

Amortization of premium or accrual of discount, but not including any interest paid thereon.

Amortization of deferred origination and commitment fees.

Deduct: A direct write-down for a decline in the fair value of a bond that is other-than-temporary.

Exclude: All other costs, including internal costs or costs paid to an affiliated reporting entity related to origination, purchase or commitment to purchase bonds, are charged to expense when incurred. Costs should also be reduced by payments attributed to the recovery of cost.

Accrued interest.

Book/Adjusted Carrying Value does not apply to collateral pledged to a reporting entity in which there has not been a default (i.e., Off-Balance Sheet Collateral).

Column 8 – Maturity Date

Enter the maturity date of the asset, when appropriate.

Column 9 – Type of Margin (I, V or IV)

Enter “I” for initial margin for assets that have been pledged or received by the reporting entity as initial margin.

Enter “V” for variation margin for assets that have been pledged or received by the reporting entity as variation margin.

Enter “IV” for both initial and variation margin for assets that have been pledged or received by the reporting entity as initial and variation margin.

**** Column 10 will be electronic only. ****

Column 10 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for counterparty as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

SCHEDULE DB – PART E

Derivatives Hedging Variable Annuity Guarantees as of December 31 of Current Year

(This schedule is specific for the derivatives and the hedging programs captured in SSAP No. 108)

See SSAP No. 108—*Derivatives Hedging Variable Annuities Guarantees* for additional accounting guidance.

Column 1	–	CDHS Identifier	Provide a unique identifier for each Clearly Defined Hedging Strategy (CDHS) reported on this schedule (e.g., 001, 002, etc.). This identifier will also be used for reporting on the SSAP No. 108 CDHS in Column 32 of Schedule DB, Part A, Section 1; Column 31 of Schedule DB, Part A, Section 2; Column 30 of Schedule DB, Part B, Section 1 and Column 26 of Schedule DB, Part B, Section 2.
Column 2	–	CDHS Description	Provide a description for each uniquely identified CDHS.
Column 3	–	Prior Fair Value in Full Contract Cash Flows Attributed to Interest Rates	Prior period full contract fair value. This reflects all product cash flows, per SSAP No. 108.
Column 4	–	Ending Fair Value in Full Contract Cash Flows Attributed to Interest Rates	Current period full contract fair value. This reflects all product cash flows, per SSAP No. 108.
Column 5	–	Fair Value Gains (Loss) in Full Contract Cash Flows Attributed to Interest Rates	Change in full contract fair value. This reflects all product cash flows, per SSAP No. 108.
Column 6	–	Fair Value Gain (Loss) in Hedged Item Attributed to Hedged Risk	Change in fair value attributable to hedged risk per SSAP No. 108.
Column 7	–	Current Year Increase (Decrease) in VM-21 Liability	VM-21 liability increase (decrease) from beginning of period to end of period.
Column 8	–	Current Year Increase (Decrease) in VM-21 Liability Attributed to Interest Rates	VM-21 liability increase (decrease) attributable to interest rate movements.
Column 9	–	Change in Fair Value of Hedged Item Attributed to Hedged Risk Percentage	Change in fair value attributed to hedged risk as a percentage of the change in full contract fair value per SSAP No. 108.
Column 10	–	Current Year Increase (Decrease) in VM-21 Liability Attributed to Hedged Risk	VM-21 liability increase (decrease) attributed to hedged risk.

Column 11	-	Prior Deferred Balance Specific CDHS deferred liability (asset) balance at end of prior reporting period.
Column 12	-	Current Year Fair Value Fluctuation of the Hedge Instruments Current year total return Fair Value fluctuations in the hedging instruments per SSAP No. 108.
Column 13	-	Current Year Natural Offset to VM-21 Liability Current year hedging instruments' total return Fair Value fluctuations that offset the current period change in the designated portion of the VM-21 liability.
Column 14	-	Hedging Instruments' Current Fair Value Fluctuation Not Attributed to Hedged Risk Current year hedging instruments' total return Fair Value fluctuations not attributable to hedged risk per SSAP No. 108.
Column 15	-	Hedge Gain (Loss) in Current Year Deferred Adjustment Current year hedging instruments' total return Fair Value fluctuations that do not offset the current period change in the designated portion of the VM-21 liability (recognized as deferred liabilities/(assets) per SSAP No. 108).
Column 16	-	Current Year Prescribed Deferred Amortization Current year deferred (liability)/asset amortization into realized gains/losses (straight line over a period not to exceed 10 years per SSAP No. 108).
Column 17	-	Current Year Additional Deferred Amortization Current year deferred (liability)/asset accelerated amortization elected by the reporting entity per SSAP No. 108.
Column 18	-	Current Year Total Deferred Amortization Total current year deferred (liability)/asset amortization into realized gains/losses.
Column 19	-	Ending Deferred Balance Specific CDHS Deferred Liability (Asset) balance at end of current reporting period.

Not for Distribution

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Not for Distribution

SCHEDULE DL – PART 1

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets reported in aggregate on Line 10 of the asset page
and not included on Schedules A, B, BA, D, DB and E.)

This schedule should include a detailed listing of reinvested collateral assets that were owned as of the end of the current reporting year. For Schedule DL, reinvested collateral assets are collateral currently held as part of a securities lending program administered by the reporting entity or its agent (affiliated or unaffiliated) that can be resold or repledged. This is the **currently held collateral**, meaning original collateral if it is still in the original form received or the newly invested asset resulting from the disposal and/or reinvestment of the original collateral. See *SSAP No. 103R—Transfers and Servicing of Financial Assets and Extinguishments of Liabilities* for accounting guidance.

Include reinvested collateral assets from securities lending programs where the program is administered by the reporting entity's unaffiliated agent (i.e., collateral is received by the reporting entity's unaffiliated agent that can be resold or repledged). These securities will be reported in aggregate on the Assets page, Line 10.

For reinvested collateral assets from securities lending programs where the program is administered by the reporting entity's affiliated agent (i.e., collateral is received by the reporting entity's affiliated agent that can be resold or repledged), the securities may be reported on Schedule DL, Part 1 if reported in aggregate on the Assets page, Line 10 or reported on Schedule DL, Part 2 if reported in other investment schedules (e.g., Schedules A, B, BA, D, DA and E), but not both.

Reinvested collateral assets reported on Schedule DL, Part 1 are excluded from other investment schedules (e.g., Schedules A, B, BA, D, DA and E).

Bonds, preferred stocks and common stocks are to be grouped separately, showing a subtotal for each category.

Securities borrowing and securities lending transactions shall be shown gross when reported in the Schedule DL. If these transactions are permitted to be reported net in accordance with *SSAP No. 64—Offsetting and Netting of Assets and Liabilities*, the investment schedule shall continue to provide detail of all transactions (gross), with the net amount from the valid right to offset reflected in the financial statements (pages 2 & 3 of the statutory financial statements). Disclosures for items reported net when a valid right to offset exists, including the gross amount, the amount offset, and the net amount reported in the financial statements are required per *SSAP No. 64—Offsetting and Netting of Assets and Liabilities*.

Bond Mutual Funds – as Identified by the SVO and Exchange Traded Funds – as Identified by the SVO, which are described in the Investment Schedules General Instructions, are to be included in SVO Identified Funds.

If an insurer has any detail line reported for any of the following required categories or subcategories, it shall report the subtotal amount of the corresponding category or subcategory, with the specified subtotal line number appearing in the same manner and location as the pre-printed total or grand total line and number:

NOTE: See the Investment Schedules General Instructions for the following:

- Category definitions for bonds and stocks.
- Code column list of codes and definitions for securities not under the exclusive control of the reporting entity.
- List of stock exchange names and abbreviations.

<u>Category</u>	<u>Line Number</u>
Bonds (Schedule D, Part 1 type):	
U.S. Governments	
Issuer Obligations.....	0199999
Residential Mortgage-Backed Securities	0299999
Commercial Mortgage-Backed Securities.....	0399999
Other Loan-Backed and Structured Securities	0499999
Subtotals – U.S. Governments	0599999
All Other Governments	
Issuer Obligations	0699999
Residential Mortgage-Backed Securities	0799999
Commercial Mortgage-Backed Securities.....	0899999
Other Loan-Backed and Structured Securities	0999999
Subtotals – All Other Governments	1099999
U.S. States, Territories and Possessions (Direct and Guaranteed)	
Issuer Obligations.....	1199999
Residential Mortgage-Backed Securities	1299999
Commercial Mortgage-Backed Securities.....	1399999
Other Loan-Backed and Structured Securities	1499999
Subtotals – U.S. States, Territories and Possessions (Direct and Guaranteed).....	1799999
U.S. Political Subdivisions of States, Territories and Possessions (Direct and Guaranteed)	
Issuer Obligations	1899999
Residential Mortgage-Backed Securities	1999999
Commercial Mortgage-Backed Securities.....	2099999
Other Loan-Backed and Structured Securities	2199999
Subtotals – U.S. Political Subdivisions of States, Territories and Possessions (Direct and Guaranteed)	2499999
U.S. Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions	
Issuer Obligations.....	2599999
Residential Mortgage-Backed Securities	2699999
Commercial Mortgage-Backed Securities.....	2799999
Other Loan-Backed and Structured Securities	2899999
Subtotals – U.S. Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions	3199999
Industrial and Miscellaneous (Unaffiliated)	
Issuer Obligations.....	3299999
Residential Mortgage-Backed Securities	3399999
Commercial Mortgage-Backed Securities.....	3499999
Other Loan-Backed and Structured Securities	3599999
Subtotals – Industrial and Miscellaneous (Unaffiliated)	3899999

Hybrid Securities	
Issuer Obligations.....	4299999
Residential Mortgage-Backed Securities.....	4399999
Commercial Mortgage-Backed Securities.....	4499999
Other Loan-Backed and Structured Securities.....	4599999
Subtotals – Hybrid Securities.....	4899999
Parent, Subsidiaries and Affiliates	
Issuer Obligations.....	4999999
Residential Mortgage-Backed Securities.....	5099999
Commercial Mortgage-Backed Securities.....	5199999
Other Loan-Backed and Structured Securities.....	5299999
Affiliated Bank Loans – Issued.....	5399999
Affiliated Bank Loans – Acquired.....	5499999
Subtotals – Parent, Subsidiaries and Affiliates.....	5599999
SVO Identified Funds	
Exchange Traded Funds – as Identified by the SVO.....	5799999
Bond Mutual Funds – as Identified by the SVO.....	5899999
Subtotals – SVO Identified Funds.....	5999999
Unaffiliated Bank Loans	
Unaffiliated Bank Loans – Issued.....	6099999
Unaffiliated Bank Loans – Acquired.....	6199999
Subtotals – Unaffiliated Bank Loans.....	6299999
Total Bonds	
Subtotals – Issuer Obligations.....	6399999
Subtotals – Residential Mortgage-Backed Securities.....	6499999
Subtotals – Commercial Mortgage-Backed Securities.....	6599999
Subtotals – Other Loan-Backed and Structured Securities.....	6699999
Subtotals – SVO Identified Funds.....	6799999
Subtotals – Affiliated Bank Loans.....	6899999
Subtotals – Unaffiliated Bank Loans.....	6999999
Subtotals – Total Bonds.....	7099999
Stocks:	
Preferred Stocks (Schedule D, Part 2, Section 1 type):	
Industrial and Miscellaneous (Unaffiliated) Perpetual and Redeemable Preferred.....	7199999
Parent, Subsidiaries and Affiliates Perpetual and Redeemable Preferred.....	7299999
Total Preferred Stocks.....	7399999
Common Stocks (Schedule D, Part 2, Section 2 type):	
Industrial and Miscellaneous (Unaffiliated).....	7499999
Parent, Subsidiaries and Affiliates.....	7599999
Mutual Funds.....	7699999
Unit Investment Trusts.....	7799999
Closed-End Funds.....	7899999
Total Common Stocks.....	7999999
Total Preferred and Common Stocks.....	8099999

Real Estate (Schedule A type)	8699999
Mortgage Loans on Real Estate (Schedule B type)	8799999
Other Invested Assets (Schedule BA type).....	8899999
Short-Term Invested Assets (Schedule DA, Part 1 type).....	8999999
Cash (Schedule E, Part 1 type)	9099999
Cash Equivalents (Schedule E, Part 2 type).....	9199999
Other Assets.....	9299999
Totals	9999999

Column 1 – CUSIP Identification

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the Standard & Poor's CUSIP Bureau. For foreign securities, use a CINS that is assigned by the Standard & Poor's CUSIP Bureau: www.cusip.com/cusip/index.htm.

For Lines 0199999 through 7999999, if no valid CUSIP, CINS or PPN number exists, then report a valid ISIN (Column 11) security number. The CUSIP field should be zero-filled.

The CUSIP reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

Lines 0199999 through 7099999	Schedule D, Part 1, Column 1
Lines 7199999 through 7399999	Schedule D, Part 2, Section 1, Column 1
Lines 7499999 through 7999999	Schedule D, Part 2, Section 2, Column 1
Line 8899999	Schedule BA, Part 1, Column 1
Line 9199999	Schedule E, Part 2, Column 1

The CUSIP number should be zero-filled for the following lines:

Real Estate (Schedule A type)	8699999
Mortgage Loans on Real Estate (Schedule B type).....	8799999
Short-Term Invested Assets (Schedule DA, Part 1 type).....	8999999
Cash (Schedule E, Part 1 type).....	9099999
Other Assets.....	9299999

Column 2 – Description

Give complete and accurate description of all bonds and preferred and common stocks as listed in the *Schedule of Investments of Securities*.

For Bond Mutual Funds – as Identified by the SVO and Exchange Traded Funds – as Identified by the SVO, enter complete name of the fund.

For Certificate of Deposit Account Registry Service (CDARs) or other similar services that have a maturity of greater than one year, individually list the various banking institutions that are financially responsible for honoring certificates of deposit.

Column 3 – Code

Enter “*” in this column for all SVO Identified Funds designated for systematic value.

Enter “@” in this column for all Principal STRIP Bonds or other zero coupon bonds.

Enter “S” in this column for Certificates of Deposit under the FDIC limit.

Enter “&” in this column for TBA (To Be Announced) securities.

Enter “^” in this column for all assets that are bifurcated between the insulated separate account filing and the non-insulated separate account filing.

If assets are not under the exclusive control of the company as shown in the General Interrogatories, they are to be identified by placing one of the codes (identified in the **Investment Schedules General Instructions**) in this column.

If the security is an SVO Identified Fund designated for systematic value, Principal STRIP bond or other zero coupon bond, certificates of deposit under the FDIC limit or a TBA (To Be Announced) security and is not under the exclusive control of the company, the “*”, “@”, “S” or “&” should appear first, immediately followed by the appropriate code (identified in the **Investment Schedules General Instructions**).

Separate Account Filing Only:

If the asset is a bifurcated asset between the insulated separate account filing and the non-insulated separate account filing, the “^” should appear first and may be used simultaneously with the “*”, “@”, “S” or “&” with the “^” preceding the other characters (“*”, “@”, “S” or “&”) depending on the asset being reported, immediately followed by the appropriate code (identified in the **Investment Schedules General Instructions**).

Column 4 – NAIC Designation and Administrative Symbol

The NAIC Designation and Administrative Symbol reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

- Lines 0199999 through 7099999 Schedule D, Part 1, Column 6
- Lines 7199999 through 7399999 Schedule D, Part 2, Section 1, Column 20
- Lines 7499999 through 7999999 Schedule D, Part 2, Section 2, Column 18
- Line 8999999 Schedule BA, Part 1, Column 7

For Lines 8699999, 8799999, 8999999, 9099999, 9199999 and 9299999, the column should be left blank.

Column 5 – Fair Value

The value reported for this column should be determined in a manner consistent with the fair value column instructions of other schedules for the lines shown below:

Lines 0199999 through 7099999	Schedule D, Part 1, Column 9
Lines 7199999 through 7399999	Schedule D, Part 2, Section 1, Column 10
Lines 7499999 through 7999999	Schedule D, Part 2, Section 2, Column 8
Line 8699999	Schedule A, Part 1, Column 10
Line 8799999	FV of the underlying collateral Schedule B, Part 1
Line 8899999	Schedule BA, Part 1, Column 11

For those lines where the same type of investment is reported on other schedules but do not have a fair value column, report the amount consistent with instructions for the following:

Line 8999999	Report BACV, Schedule DA, Part 1, Column 7
Line 9099999	Report Balance, Schedule E Part 1, Column 6
Line 9199999	Report BACV, Schedule E Part 2, Column 7

Column 6 – Book/Adjusted Carrying Value

The value reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

Lines 0199999 through 7099999	Schedule D, Part 1, Column 11
Lines 7199999 through 7399999	Schedule D, Part 2, Section 1, Column 8
Lines 7499999 through 7999999	Schedule D, Part 2, Section 2, Column 6
Line 8699999	Schedule A, Part 1, Column 9
Line 8799999	Schedule B, Part 1, Column 8
Line 8899999	Schedule BA, Part 1, Column 12
Line 8999999	Schedule DA, Part 1, Column 7
Line 9099999	Report Balance, Schedule E, Part 1, Column 6
Line 9199999	Schedule E, Part 2, Column 7

Column 7 – Maturity Date

The maturity date reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

Lines 0199999 through 7099999	Schedule D, Part 1, Column 22
Line 8999999	Schedule DA, Part 1, Column 6
Line 9199999	Schedule E, Part 2, Column 6

The following lines are considered assets with no maturity date and should be left blank:

7199999 through 7399999	Preferred Stock (Schedule D, Part 2, Section 1 type)
7499999 through 7999999	Common Stock (Schedule D, Part 2, Section 2 type)
8699999	Real Estate (Schedule A type)
8799999	Mortgage Loans on Real Estate (Schedule B type)
8899999	Other Invested Assets (Schedule BA type)
9299999	Other Assets

**** Columns 8 through 11 will be electronic only. ****

Column 8 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Whenever possible, fair value should represent the price at which the security could be sold, based on market information. Fair value should only be determined analytically when the market-based value cannot be obtained.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

- “1” for Level 1
- “2” for Level 2
- “3” for Level 3

The following is a listing of the valid method indicators to show the method used by the reporting entity to determine the Rate Used to Obtain Fair Value.

- “a” for securities where the rate is determined by a pricing service.
- “b” for securities where the rate is determined by a stock exchange.
- “c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued.
- “d” for securities where the rate is determined by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.
- “e” for securities where the rate is determined by the unit price published in the NAIC *Valuation of Securities*.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

The guidance in *SAP No. 100R—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value leave blank.

Column 9 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most stock exchange codes can be found in the Investment Schedules General Instructions or the following Web address:

www.fixprotocol.org/specifications/exchanges.shtml

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

For Method Code “e,” leave blank.

If net asset value (NAV) is used instead of fair value, the reporting entity should use “NAV” to indicate net asset value used instead of fair value.

Column 10 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any mortgagor, issuer or counterparty as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

Column 11 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of the respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

The ISIN reported for this column should be determined in a manner consistent with the instructions of other schedules for the lines shown below:

Lines 0199999 through 7099999	Schedule D, Part 1, Column 1
Lines 7199999 through 7399999	Schedule D, Part 2, Section 1, Column 1
Lines 7499999 through 7999999	Schedule D, Part 2, Section 2, Column 1

The LEI number should be zero-filled for the following lines:

Real Estate (Schedule A type)	8699999
Mortgage Loans on Real Estate (Schedule B type).....	8799999
Other Invested Assets (Schedule BA type).....	8899999
Short-Term Invested Assets (Schedule DA, Part 1 type).....	8999999
Cash (Schedule E, Part 1 type).....	9099999
Cash Equivalents (Schedule E, Part 2 type).....	9199999
Other Assets.....	9299999

General Interrogatories:

1. The total activity for the year represents the net increase (decrease) from the prior year-end to the current year-end.
2. The average balance for the year is the average daily balance.

Average daily balance: Total of daily balances divided by the number of days. Always calculate based on a 365/366 day year. If data is missing for a given date (e.g., weekend, holiday), count the previous day's value multiple times. The actual day count for the year (365/366) would serve as the denominator in the average calculation.

Not for Distribution

SCHEDULE DL – PART 2

SECURITIES LENDING COLLATERAL ASSETS

Reinvested Collateral Assets Owned December 31 Current Year
(Securities lending collateral assets included on Schedules A, B, BA, D, DB and E
and not reported in aggregate on Line 10 of the asset page.)

This schedule should include a detailed listing of reinvested collateral assets that were owned as of the end of the current reporting year. For Schedule DL, reinvested collateral assets are collateral currently held as part of a securities lending program administered by the reporting entity or its agent (affiliated or unaffiliated) that can be resold or repledged. This is the **currently held collateral**, meaning original collateral if it is still in the original form received or the newly invested asset resulting from the disposal and/or reinvestment of the original collateral. See *SSAP No. 103R—Transfers and Servicing of Financial Assets and Extinguishments of Liabilities* for accounting guidance.

Include reinvested collateral assets from securities lending programs where the programs administered by the reporting entity (i.e., collateral is received by the reporting entity that can be resold or repledged).

For reinvested collateral assets from securities lending programs where the program is administered by the reporting entity's affiliated agent (i.e., collateral is received by the reporting entity's affiliated agent that can be resold or repledged), the securities may be reported on Schedule DL, Part 2 if reported in other investment schedules (e.g., Schedules A, B, BA, D, DA and E) or reported on Schedule DL, Part 1 if reported in aggregate on the Asset page, Line 10, but not both.

Reinvested collateral assets reported on Schedule DL, Part 2 are included in the other investment schedules (e.g., Schedules A, B, BA, D, DA and E).

Bonds, preferred stocks and common stocks are to be grouped separately, showing a subtotal for each category.

Securities borrowing and securities lending transactions shall be shown gross when reported in the Schedule DL. If these transactions are permitted to be reported net in accordance with *SSAP No. 64—Offsetting and Netting of Assets and Liabilities*, the investment schedule shall continue to provide detail on all transactions (gross), with the net amount from the valid right to offset reflected in the financial statements (pages 2 & 3 of the statutory financial statements). Disclosures for items reported net when a valid right to offset exists, including the gross amount, the amount offset, and the net amount reported in the financial statements are required per *SSAP No. 64—Offsetting and Netting of Assets and Liabilities*.

Bond Mutual Funds – as Identified by the SVO and Exchange Traded Funds – as Identified by the SVO that are described in the Investment Schedules General Instructions are to be included in SVO Identified Funds.

If an insurer has any detail lines reported for any of the following required categories or subcategories, it shall report the subtotal amount of the corresponding category or subcategory, with the specified subtotal line number appearing in the same manner and location as the reported total or grand total line and number:

NOTE: See the Investment Schedules General Instructions for the following:

- Category definitions for bonds and stocks.
- Code column list of codes and definitions for securities not under the exclusive control of the reporting entity.
- List of stock exchange names and abbreviations.

<u>Category</u>	<u>Line Number</u>
Bonds (Schedule D, Part 1):	
U.S. Governments	
Issuer Obligations.....	0199999
Residential Mortgage-Backed Securities	0299999
Commercial Mortgage-Backed Securities.....	0399999
Other Loan-Backed and Structured Securities	0499999
Subtotals – U.S. Governments	0599999
All Other Governments	
Issuer Obligations	0699999
Residential Mortgage-Backed Securities	0799999
Commercial Mortgage-Backed Securities.....	0899999
Other Loan-Backed and Structured Securities	0999999
Subtotals – All Other Governments	1099999
U.S. States, Territories and Possessions (Direct and Guaranteed)	
Issuer Obligations.....	1199999
Residential Mortgage-Backed Securities	1299999
Commercial Mortgage-Backed Securities.....	1399999
Other Loan-Backed and Structured Securities	1499999
Subtotals – U.S. States, Territories and Possessions (Direct and Guaranteed).....	1799999
U.S. Political Subdivisions of States, Territories and Possessions (Direct and Guaranteed)	
Issuer Obligations	1899999
Residential Mortgage-Backed Securities	1999999
Commercial Mortgage-Backed Securities.....	2099999
Other Loan-Backed and Structured Securities	2199999
Subtotals – U.S. Political Subdivisions of States, Territories and Possessions (Direct and Guaranteed)	2499999
U.S. Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions	
Issuer Obligations.....	2599999
Residential Mortgage-Backed Securities	2699999
Commercial Mortgage-Backed Securities.....	2799999
Other Loan-Backed and Structured Securities	2899999
Subtotals – U.S. Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions	3199999
Industrial and Miscellaneous (Unaffiliated)	
Issuer Obligations.....	3299999
Residential Mortgage-Backed Securities	3399999
Commercial Mortgage-Backed Securities.....	3499999
Other Loan-Backed and Structured Securities	3599999
Subtotals – Industrial and Miscellaneous (Unaffiliated)	3899999

Hybrid Securities	
Issuer Obligations.....	4299999
Residential Mortgage-Backed Securities.....	4399999
Commercial Mortgage-Backed Securities.....	4499999
Other Loan-Backed and Structured Securities.....	4599999
Subtotals – Hybrid Securities.....	4899999
Parent, Subsidiaries and Affiliates	
Issuer Obligations.....	4999999
Residential Mortgage-Backed Securities.....	5099999
Commercial Mortgage-Backed Securities.....	5199999
Other Loan-Backed and Structured Securities.....	5299999
Affiliated Bank Loans – Issued.....	5399999
Affiliated Bank Loans – Acquired.....	5499999
Subtotals – Parent, Subsidiaries and Affiliates.....	5599999
SVO Identified Funds	
Exchange Traded Funds – as Identified by the SVO.....	5799999
Bond Mutual Funds – as Identified by the SVO.....	5899999
Subtotals – SVO Identified Funds.....	5999999
Unaffiliated Bank Loans	
Unaffiliated Bank Loans – Issued.....	6099999
Unaffiliated Bank Loans – Acquired.....	6199999
Subtotals – Unaffiliated Bank Loans.....	6299999
Total Bonds	
Subtotals – Issuer Obligations.....	6399999
Subtotals – Residential Mortgage-Backed Securities.....	6499999
Subtotals – Commercial Mortgage-Backed Securities.....	6599999
Subtotals – Other Loan-Backed and Structured Securities.....	6699999
Subtotals – SVO Identified Funds.....	6799999
Subtotals – Affiliated Bank Loans.....	6899999
Subtotals – Bank Loans.....	6999999
Subtotals – Total Bonds.....	7099999
Stocks:	
Preferred Stocks:	
Industrial and Miscellaneous (Unaffiliated) Perpetual and Redeemable Preferred.....	7199999
Parent, Subsidiaries and Affiliates Perpetual and Redeemable Preferred.....	7299999
Total Preferred Stocks.....	7399999
Common Stocks:	
Industrial and Miscellaneous (Unaffiliated).....	7499999
Parent, Subsidiaries and Affiliates.....	7599999
Mutual Funds.....	7699999
Unit Investment Trusts.....	7799999
Closed-End Funds.....	7899999
Total Common Stocks.....	7999999
Total Preferred and Common Stocks.....	8099999

Real Estate (Schedule A).....	8699999
Mortgage Loans on Real Estate (Schedule B).....	8799999
Other Invested Assets (Schedule BA).....	8899999
Short-Term Invested Assets (Schedule DA, Part 1).....	8999999
Cash (Schedule E, Part 1).....	9099999
Cash Equivalents (Schedule E, Part 2).....	9199999
Other Assets.....	9299999
Totals.....	9999999

Column 1 – CUSIP Identification

CUSIP numbers for all purchased publicly issued securities are available from the broker's confirmation or the certificate. For private placement securities, the NAIC has created a special number called a PPN to be assigned by the Standard & Poor's CUSIP Bureau. For foreign securities, use a CINS that is assigned by the Standard & Poor's CUSIP Bureau: www.cusip.com/cusip/index.htm.

For Lines 0199999 through 7999999, if no valid CUSIP, CINS or PPN number exists, then report a valid ISIN (Column 11) security number. The CUSIP field should be zero-filled.

The CUSIP reported for this column should be same for the security as reported in other schedules for the lines shown below:

Lines 0199999 through 7099999.....	Schedule D, Part 1, Column 1
Lines 7199999 through 7399999.....	Schedule D, Part 2, Section 1, Column 1
Lines 7499999 through 7999999.....	Schedule D, Part 2, Section 2, Column 1
Line 8899999.....	Schedule BA, Part 1, Column 1
Line 9199999.....	Schedule E, Part 2, Column 1

The CUSIP number should be zero-filled for the following lines:

Real Estate (Schedule A).....	8699999
Mortgage Loans on Real Estate (Schedule B).....	8799999
Short-Term Invested Assets (Schedule DA, Part 1).....	8999999
Cash (Schedule E, Part 1).....	9099999
Other Assets.....	9299999

Column 2 – Description

Give complete and accurate description of all bonds and preferred and common stocks as listed in the *Situations of Securities*.

For Bond Mutual Funds – as Identified by the SVO and Exchange Traded Funds – as Identified by the SVO, enter complete name of the fund.

For Certificate of Deposit Account Registry Service (CDARs) or other similar services that have a maturity of greater than one year, individually list the various banking institutions that are financially responsible for honoring certificates of deposit.

Column 3 – Code

Enter “*” in this column for all SVO Identified Funds designated for systematic value.

Enter “@” in this column for all Principal STRIP Bonds or other zero coupon bonds.

Enter “S” in this column for Certificates of Deposit under the FDIC limit.

Enter “&” in this column for TBA (To Be Announced) securities.

Enter “^” in this column for all assets that are bifurcated between the insulated separate account filing and the non-insulated separate account filing.

If assets are not under the exclusive control of the company as shown in the General Interrogatories, they are to be identified by placing one of the codes (identified in the **Investment Schedules General Instructions**) in this column.

If the security is an SVO Identified Fund designated for systematic value, Principal STRIP bond or other zero coupon bond, certificates of deposit under the FDIC limit or a TBA (To Be Announced) security and is not under the exclusive control of the company, the “*”, “@”, “S” or “&” should appear first, immediately followed by the appropriate code (identified in the **Investment Schedules General Instructions**).

Separate Account Filing Only:

If the asset is a bifurcated asset between the insulated separate account filing and the non-insulated separate account filing, the “^” should appear first and may be used simultaneously with the “*”, “@”, “S” or “&” with the “^” preceding the other characters (“*”, “@”, “S” or “&”) depending on the asset being reported, immediately followed by the appropriate code (identified in the **Investment Schedules General Instructions**).

Column 4 – NAIC Designation and Administrative Symbol

The NAIC Designation and Administrative Symbol reported for this column should be same for the security as reported in other schedules for the lines shown below:

- Lines 0199999 through 7099999 Schedule D, Part 1, Column 6
- Lines 7199999 through 7399999 Schedule D, Part 2, Section 1, Column 20
- Lines 7499999 through 7999999 Schedule D, Part 2, Section 2, Column 18
- Line 8999999 Schedule BA, Part 1, Column 7

For Lines 8699999, 8799999, 8999999, 9099999, 9199999 and 9299999, the column should be left blank.

Column 5 – Fair Value

The value reported for this column should be same for the security as reported in other schedules for the lines shown below:

Lines 0199999 through 7099999	Schedule D, Part 1, Column 9
Lines 7199999 through 7399999	Schedule D, Part 2, Section 1, Column 10
Lines 7499999 through 7999999	Schedule D, Part 2, Section 2, Column 8
Line 8699999	Schedule A, Part 1, Column 10
Line 8799999	FV of the underlying collateral Schedule B, Part 1
Line 8899999	Schedule BA, Part 1, Column 11

For those lines where the same investment is reported on other schedules but do not have a fair value column, report the amount in these columns in the other schedules for the lines shown below:

Line 8999999	Report BACV, Schedule DA, Part 1, Column 7
Line 9099999	Report Balance, Schedule E, Part 1, Column 6
Line 9199999	Report BACV, Schedule E, Part 2, Column 7

Column 6 – Book/Adjusted Carrying Value

The value reported for this column should be same for the security as reported in other schedules for the lines shown below:

Lines 0199999 through 7099999	Schedule D, Part 1, Column 11
Lines 7199999 through 7399999	Schedule D, Part 2, Section 1, Column 8
Lines 7499999 through 7999999	Schedule D, Part 2, Section 2, Column 6
Line 8699999	Schedule A, Part 1, Column 9
Line 8799999	Schedule B, Part 1, Column 8
Line 8899999	Schedule BA, Part 1, Column 12
Line 8999999	Schedule DA, Part 1, Column 7
Line 9099999	Report Balance, Schedule E, Part 1, Column 6
Line 9199999	Schedule E, Part 2, Column 7

Column 7 – Maturity Date

The maturity date reported for this column should be same for the security as reported in other schedules for the lines shown below:

Lines 0199999 through 7099999	Schedule D, Part 1, Column 22
Line 8999999	Schedule DA, Part 1, Column 6
Line 9199999	Schedule E, Part 2, Column 6

The following lines are considered assets with no maturity date and should be left blank:

7199999 through 7399999	Preferred Stock (Schedule D, Part 2, Section 1 type)
7499999 through 7999999	Common Stock (Schedule D, Part 2, Section 2 type)
8699999	Real Estate (Schedule A type)
8799999	Mortgage Loans on Real Estate (Schedule B type)
8899999	Other Invested Assets (Schedule BA type)
9299999	Other Assets

**** Columns 8 through 11 will be electronic only. ****

Column 8 – Fair Value Hierarchy Level and Method Used to Obtain Fair Value Code

Whenever possible, fair value should represent the price at which the security could be sold, based on market information. Fair value should only be determined analytically when the market-based value cannot be obtained.

The following is a listing of valid fair value level indicators to show the fair value hierarchy level.

- “1” for Level 1
- “2” for Level 2
- “3” for Level 3

The following is a listing of the valid method indicators to show the method used by the reporting entity to determine the Rate Used to Obtain Fair Value.

- “a” for securities where the rate is determined by a pricing service.
- “b” for securities where the rate is determined by a stock exchange.
- “c” for securities where the rate is determined by a broker or custodian. The reporting entity should obtain and maintain the pricing policy for any broker or custodian used as a pricing source. In addition, the broker must either be approved by the reporting entity as a counterparty for buying and selling securities or be an underwriter of the security being valued.
- “d” for securities where the rate is determined by the reporting entity. The reporting entity is required to maintain a record of the pricing methodology used.
- “e” for securities where the rate is determined by the unit price published in the NAIC *Valuation of Securities*.

Enter a combination of hierarchy and method indicator. The fair value hierarchy level indicator would be listed first and the method used to determine fair value indicator would be listed next. For example, use “1b” to report Level 1 for the fair value hierarchy level and stock exchange for the method used to determine fair value.

The guidance in *SAP No. 100R—Fair Value* allows the use of net asset value per share (NAV) instead of fair value for certain investments. If NAV is used instead of fair value leave blank.

Column 9 – Source Used to Obtain Fair Value

For Method Code “a,” identify the specific pricing service used.

For Method Code “b,” identify the specific stock exchange used.

The listing of most stock exchange codes can be found in the Investment Schedules General Instructions or the following Web address:

www.fixprotocol.org/specifications/exchanges.shtml

For Method Code “c,” identify the specific broker or custodian used.

For Method Code “d,” leave blank.

For Method Code “e,” leave blank.

If net asset value (NAV) is used instead of fair value, the reporting entity should use “NAV” to indicate net asset value used instead of fair value.

Column 10 – Legal Entity Identifier (LEI)

Provide the 20-character Legal Entity Identifier (LEI) for any mortgagor, issuer or counterparty as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

Column 11 – ISIN Identification

The International Securities Identification Numbering (ISIN) system is an international standard set up by the International Organization for Standardization (ISO). It is used for numbering specific securities, such as stocks, bonds, options and futures. ISIN numbers are administered by a National Numbering Agency (NNA) in each of the respective countries, and they work just like serial numbers for those securities. Record the ISIN number only if no valid CUSIP, CINS or PPN exists to report in Column 1.

The ISIN reported for this column should be same for the security as reported in other schedules for the lines shown below:

Lines 0199999 through 7099999	Schedule D, Part 1, Column 1
Lines 7199999 through 7399999	Schedule D, Part 2, Section 1, Column 1
Lines 7499999 through 7999999	Schedule D, Part 2, Section 2, Column 1

The LEI number should be zero-filled for the following lines:

Real Estate (Schedule A)	8699999
Mortgage Loans on Real Estate (Schedule B)	8799999
Other Invested Assets (Schedule BA)	8899999
Short-Term Invested Assets (Schedule DA, Part 1)	8999999
Cash (Schedule E, Part 1)	9099999
Cash Equivalents (Schedule E, Part 2)	9199999
Other Assets	9299999

General Interrogatories:

1. The total activity for the year represents the net increase (decrease) from the prior year-end to the current year-end.
2. The average balance for the year is the average daily balance.

Average daily balance: Total of daily balances divided by the number of days. Always calculate based on a 365/366 day year. If data is missing for a given date (e.g., weekend, holiday), count the previous day's value multiple times. The actual day count for the year (365/366) would serve as the denominator in the average calculation.

Not for Distribution

Not for Distribution

SCHEDULE E – PART 1 – CASH

This schedule shows all banks, trust companies, savings and loan and building and loan associations in which the company maintained deposits at any time during the year and the balances, if any (according to Reporting Entity's record), on December 31 of the current year. Certificates of deposit in banks or other similar financial institutions with maturity dates of one year or less from the acquisition date and other instruments defined as cash in accordance with *SSAP No. 2R—Cash, Cash Equivalents, Drafts, and Short-Term Investments* should be reported in this schedule. All Cash Equivalents should be reported in Schedule E, Part 2. Long-term certificates of deposit are to be reported in Schedule D.

In each case where the depository is not incorporated and subject to government supervision, the word "PRIVATE" in capitals and in parentheses — (PRIVATE) — should be inserted to the left of the name of the depository.

Report separately all deposits in excess of \$250,000 or less than (\$250,000). Deposits not exceeding \$250,000 or not less than (\$250,000) in federally insured depositories may be combined. Deposits in foreign bank accounts may be combined to the extent that the amount on deposit does not exceed the lesser of \$250,000 or the amount of the foreign guarantee. The amount combined should be reported opposite the caption, "Deposits in (insert number) depositories that do not exceed the allowable limit." However, any reporting entity that does not maintain total deposits in any one depository of more than \$250,000 is required to list its primary depository; and all entities must list all depositories where the total deposits or overdrafts (as represented by the absolute value) exceed 5% of the total cash as reported on Page 2 of the annual statement.

For Certificate of Deposit Account Registry Service (CDARs) or other similar services that have a maturity of one year or less, each individual banking institution providing a certificate of deposit should be reviewed separately to determine if the balance maintained by the reporting entity at that banking institution meets the criteria set forth above (i.e., does not exceed \$250,000 or is not less than (\$250,000) in federally insured depositories) in combining with other depository balances. If not, it should be listed individually on the schedule.

Cash in Reporting Entity's Office should be reported in this schedule.

The total of all Cash on Deposit at December 31 plus Cash in Reporting Entity's office (Total Cash, on a gross basis), less any applicable nonadmitted amounts (e.g., nonadmitted cash resulting from state-imposed limitations), should equal the parenthetical amount reported as cash on the Assets Page.

If the reporting entity has any detail lines reported for any of the following required groups, categories, or subcategories, it shall report the subtotal amount of the corresponding group, category, or subcategory, with the specified subtotal line number appearing in the same manner and location as the pre-printed total or grand total line and number:

<u>Group or Category</u>	<u>Line Number</u>
Deposits in (insert number) depositories that do not exceed allowable limits in any one depository – Open Depositories	0199998
Totals – Open Depositories	0199999
Deposits in (insert number) depositories that do not exceed allowable limits in any one depository – Suspended Depositories	0299998
Totals – Suspended Depositories	0299999
Total Cash on Deposit	0399999
Cash in Company Office	0499999
Total Cash	0599999

Column 1	–	<p>Depository</p> <p>Give full name and location. Indicate whether the depository is a parent, subsidiary, or affiliate. Give maturity date in the case of certificates of deposit or time deposits.</p>
Column 2	–	<p>Code</p> <p>Enter “^” in this column for all assets that are bifurcated between the insulated separate account filing and the non-insulated separate account filing.</p> <p>If cash is not under the exclusive control of the company as shown in the General Instructions, it is to be identified by placing one of the symbols identified in the Investment Schedules General Instructions in this column.</p> <p><u>Separate Account Filing Only:</u></p> <p>If the asset is a bifurcated asset between the insulated separate account filing and the non-insulated separate account filing, the “^” should appear first, immediately followed by the appropriate code (identified in the Investment Schedules General Instructions).</p>
Column 3	–	<p>Rate of Interest</p> <p>Show the rate as stated on the face of the note. Where the original stated rate has been renegotiated show the latest modified rate. All information reported in this field must be a numeric value.</p>
Column 4	–	<p>Amount of Interest Received During Year</p> <p>Include: Investment income directly related to the securities reported in this schedule.</p>
Column 7	–	<p>* Column</p> <p>Place an “*” in this column when the reporting entity is taking credit for the estimated amount recoverable in a suspended deposit.</p> <p>** Column 8 will be electronic only. **</p>
Column 8	–	<p>Legal Entity Identifier (LEI)</p> <p>Provide the 20-character Legal Entity Identifier (LEI) for any depository as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.</p>

SCHEDULE E – PART 2 – CASH EQUIVALENTS

List all investments owned whose maturities (or repurchase dates under repurchase agreement) at the time of acquisition were three months or less and defined as cash equivalents in accordance with *SSAP No. 2R—Cash, Cash Equivalents, Drafts, and Short-Term Investments*. Include Money Market Mutual Funds.

Refer to *SSAP No. 23—Foreign Currency Transactions and Translations* for accounting guidance related to foreign currency transactions and translations.

Short Sales:

Selling a security short is an action by a reporting entity that results with the reporting entity recognizing proceeds from the sale and an obligation to deliver the sold security. For statutory accounting purposes, obligations to deliver securities resulting from short sales shall be reported as contra-assets (negative assets) in the investment schedule, with an investment code in the code column detailing the item as a short sale. The obligation (negative asset) shall be initially reflected at fair value, with changes in fair value recognized as unrealized gains and losses. These unrealized gains and losses shall be realized upon settlement of the short sale obligation. Interest on short sale positions shall be accrued periodically and reported as interest expense.

If a reporting entity has any detail lines reported for any of the following required categories or subcategories, it shall report the subtotal amounts of the corresponding category or subcategory with the specified subtotal line number appearing in the same manner and location as the pre-printed total or grand total line and number.

NOTE: See the Investment Schedules General Instructions for the following:

- **Category definitions for bonds.**
- **Code column list of codes and definitions for securities not under the exclusive control of the reporting entity.**

	<u>Category</u>	<u>Line Number</u>
Bonds:		
U.S. Governments		
	Issuer Obligations.....	0199999
	Residential Mortgage-Backed Securities.....	0299999
	Commercial Mortgage-Backed Securities.....	0399999
	Other Loan-Backed and Structured Securities.....	0499999
	Subtotals – U.S. Governments.....	0599999
All Other Governments		
	Issuer Obligations.....	0699999
	Residential Mortgage-Backed Securities.....	0799999
	Commercial Mortgage-Backed Securities.....	0899999
	Other Loan-Backed and Structured Securities.....	0999999
	Subtotals – All Other Governments.....	1099999
U.S. States, Territories and Possessions (Direct and Guaranteed)		
	Issuer Obligations.....	1199999
	Residential Mortgage-Backed Securities.....	1299999
	Commercial Mortgage-Backed Securities.....	1399999
	Other Loan-Backed and Structured Securities.....	1499999
	Subtotals – States, Territories and Possessions (Direct and Guaranteed).....	1799999

U.S. Political Subdivisions of States, Territories and Possessions (Direct and Guaranteed)

Issuer Obligations.....	1899999
Residential Mortgage-Backed Securities	1999999
Commercial Mortgage-Backed Securities.....	2099999
Other Loan-Backed and Structured Securities	2199999
Subtotals – Political Subdivisions of States, Territories and Possessions (Direct and Guaranteed)	2499999

U.S. Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions

Issuer Obligations.....	2599999
Residential Mortgage-Backed Securities	2699999
Commercial Mortgage-Backed Securities.....	2799999
Other Loan-Backed and Structured Securities	2899999
Subtotals – Special Revenue and Special Assessment Obligations and all Non-Guaranteed Obligations of Agencies and Authorities of Governments and Their Political Subdivisions	3199999

Industrial and Miscellaneous (Unaffiliated)

Issuer Obligations.....	3299999
Residential Mortgage-Backed Securities	3399999
Commercial Mortgage-Backed Securities.....	3499999
Other Loan-Backed and Structured Securities	3599999
Subtotals – Industrial and Miscellaneous (Unaffiliated).....	3899999

Hybrid Securities

Issuer Obligations.....	4299999
Residential Mortgage-Backed Securities	4399999
Commercial-Backed Securities	4499999
Other Loan-Backed and Structured Securities	4599999
Subtotals – Hybrid Securities.....	4899999

Parent, Subsidiaries and Affiliates Bonds

Issuer Obligations.....	4999999
Residential Mortgage-Backed Securities	5099999
Commercial Mortgage-Backed Securities.....	5199999
Other Loan-Backed and Structured Securities	5299999
Affiliated Bank Loans – Issued.....	5399999
Affiliated Bank Loans – Acquired.....	5499999
Subtotals – Parent, Subsidiaries and Affiliates Bonds	5599999

SVO Identified Funds

Exchange-Traded Funds – as Identified by the SVO.....	5899999
Bond Mutual Funds – as Identified by the SVO	5999999
Subtotals – SVO Identified Funds.....	6099999

Unaffiliated Bank Loans

Unaffiliated Bank Loans – Issued	6399999
Unaffiliated Bank Loans – Acquired.....	6499999
Subtotals – Unaffiliated Bank Loans.....	6599999

Total Bonds

Subtotals – Issuer Obligations.....	7699999
Subtotals – Residential Mortgage-Backed Securities.....	7799999
Subtotals – Commercial Mortgage-Backed Securities.....	7899999
Subtotals – Other Loan-Backed and Structured Securities.....	7999999
Subtotals – SVO Identified Funds.....	8099999
Subtotals – Affiliated Bank Loans.....	8199999
Subtotals – Unaffiliated Bank Loans.....	8299999
Subtotals – Bonds.....	8399999
Sweep Accounts.....	8499999
Exempt Money Market Mutual Funds – as Identified by SVO.....	8599999
All Other Money Market Mutual Funds.....	8699999
Other Cash Equivalents.....	8799999
Total Cash Equivalents.....	8899999

A money market fund shall be reported in this schedule as an Exempt Money Market Mutual Fund if such money market fund is identified by the SVO as meeting the required conditions found in Part Six, Section 2(b)(i) of the *Purposes and Procedures Manual of the NAIC Investment Analysis Office*. All money market mutual funds that are not identified by the SVO on the U.S. Direct Obligations/Full Faith and Credit Exempt List shall be reported in this schedule as an “all other money market mutual fund.”

Column 1 – CUSIP Identification

All CUSIP numbers entered in this column must conform to those as published in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office*, Part Six, Sections 2(f) and (g).

CUSIP identification is **required and valid only** for Exempt Money Market Mutual Funds – as Identified by SVO (Line 8599999) and All Other Money Market Mutual Funds (Line 8699999).

Column 2 – Description

Give a complete and accurate description.

Column 3 – Code

Enter “B” in this column for all assets that are bifurcated between the insulated separate account filing and the non-insulated separate account filing.

If a cash equivalent is not under the exclusive control of the company as shown in the General Instructions, it is to be identified by placing one of the **codes identified in the Investment Schedules General Instructions** in this column.

Separate Account Filing Only:

If the asset is a bifurcated asset between the insulated separate account filing and the non-insulated separate account filing, the “B” should appear first, immediately followed by the appropriate code (**identified in the Investment Schedules General Instructions**).

- Column 4 – Date Acquired
- For public placements use trade date, not settlement date. For private placements, use funding date. Each issue of bonds or stocks acquired at public offerings on more than one date may be totaled on one line and the date of last acquisition inserted.
- Column 5 – Rate of Interest
- Show rate of interest as stated on the face of the issue. Cash equivalent bonds with various issues of the same issuer use the last rate of interest. All information reported in this field must be a numeric value.
- Column 6 – Maturity Date
- Reporting entities may total on one line purchases of various issues of the same issuer of cash equivalent investments and insert the date of last maturity.
- Column 9 – Amount Received During Year
- Include: Investment income directly related to the securities reported in this schedule.
- Accrual of discount and amortization of premiums, when applicable.
- Report amounts net of foreign withholding tax.
- ** Column 10 will be electronic only. ****
- Column 10 – Legal Entity Identifier (LEI)
- Provide the 20-character Legal Entity Identifier (LEI) for any issuer as assigned by a designated Local Operating Unit. If no LEI number has been assigned, leave blank.

SCHEDULE E – PART 3 – SPECIAL DEPOSITS

The amounts reported in this schedule also are included in the various asset schedules of the company.

Exclude from this schedule all deposits or operating accounts in financial institutions that the company uses in the normal course of its business.

Column 1 – Type of Deposit

Include in this column, one of the following indicators:

- B – Bond
- S – Stocks
- M – Mortgages
- C – Certificates of Deposit
- R – Real Estate
- ST – Cash/Short-Term Investments
- O – Other (Use this symbol when multiple types of assets are on deposit within a particular jurisdiction.)

Column 2 – Purpose of Deposit

The following are examples of suggested entries for stating the purpose of the deposit:

- Bail Bonds
- Workers' Compensation
- Property & Casualty
- Fidelity & Surety
- IIMO
- Life Insurance
- Collateral for _____
- Pledged for _____
- Escrow for _____
- Reinsurance with _____

If needed, you may enter multiple purposes in Column 2, if the totals in Columns 3 through 6 include multiple deposits.

Columns 3 and 4 – Deposits for the Benefit of All Policyholders

Report only the statutory deposit held for the benefit of all policyholders. **DO NOT INCLUDE** deposits held for a special purpose. Reporting entities must report these special purpose deposits in Columns 5 and 6.

Columns 5
and 6

– All Other Special Deposits

Report any deposits not included in Column 3 and 4 which are held for any special or statutory purpose.

Include: Deposits held for a special purpose.

Deposits to secure reinsurance obligations.

Deposits to satisfy a particular claim or litigation (list separately).

Exclude: Deposits held for the benefit of all policyholders (reported in Columns 3 and 4).

Deposits or operating accounts in financial institutions that the company uses in the normal course of its business.

Columns 3
and 5

– Book/Adjusted Carrying Value

Enter the balance sheet value of each deposit.

Columns 4
and 6

– Fair Value

Enter the fair value of each special deposit.

Details of Write-ins Aggregated at Line 58 – Aggregate Alien and Other

List separately each deposit to secure reinsurance obligations and reflect these amounts in the appropriate parts of the reinsurance schedules.

List separately each deposit to satisfy a particular claim or litigation.

Not for Distribution

SUPPLEMENTAL COMPENSATION EXHIBIT

Each reporting entity shall file with its state of domicile and any state that requests it in writing a Supplemental Compensation Exhibit for such directors, officers, and employees and in such manner as provided below.

The Exhibit shall be filed as a supplement to each reporting entity's annual statement to the domiciliary Department on or before March 1. The purpose of the Exhibit is to provide information to the regulator concerning payments to senior management and directors that could negatively impact a reporting entity's financial condition.

Insurers that are part of a group of insurers or other holding company system may file amounts paid to officers and employees of more than one insurer in the group or system either on a total gross basis or by allocation to each insurer.

Compensation shall consist of any and all remuneration paid to or on behalf of an officer, employee, or director covered by this requirement, including, but not limited to, wages, salaries, bonuses, commissions, stock grants, gains from the exercise of stock options, and any other emolument.

Supplemental Compensation Exhibit

- A table disclosing the total of all compensation paid to the named officer, shall be provided.
- The table shall cover a three-year period, although companies may phase in the required disclosures over the first three years of reporting.
- For awards of stock, the dollar amount reported shall be based upon the aggregate grant date value of awards computed in accordance with *SSAP No. 104R—Share-Based Payments*.
- Provide a narrative description of any material factors necessary to gain an understanding of the information disclosed in the tables in Part 4.

Part 2

Officer and Employee Compensation

Reporting entities shall disclose the compensation of:

1. All individuals serving as the principal executive officer ("PEO") or acting in a similar capacity during the last completed fiscal year, regardless of compensation level;
2. All individuals serving as the principal financial officer ("PFO") or acting in a similar capacity during the last completed fiscal year, regardless of compensation level;
3. The reporting entity's ten most highly compensated executive officers, other than the PEO and PFO, who were serving as executive officers at the end of the last completed fiscal year; and
4. The next ten most highly compensated employees whose individual total compensation exceeds \$100,000.

The determination as to which executive officers are most highly compensated shall be made by reference to total compensation for the last completed fiscal year provided; however, no disclosure need be provided for any executive officer, other than the PEO and PFO, whose total compensation, as so reduced, does not exceed \$100,000.

If the PEO or PFO served in that capacity during any part of a fiscal year with respect to which information is required, information should be provided as to all of his or her compensation for the full fiscal year. If a named executive officer (other than the PEO or PFO) served as an executive officer of the reporting entity (whether or not in the same position) during any part of the fiscal year with respect to which information is required, information shall be provided as to all compensation of that individual for the full fiscal year.

Definitions. For purposes of this disclosure:

1. The term **“stock”** means instruments such as common stock, restricted stock, restricted stock units, phantom stock, phantom stock units, common stock equivalent units or any similar instruments that do not have option-like features, and the term **option** means instruments such as stock options, stock appreciation rights and similar instruments with option-like features. The term **stock appreciation rights (SARs)** refers to SARs payable in cash or stock, including SARs payable in cash or stock at the election of the registrant or a named executive officer. The term **“equity”** is used to refer generally to stock and/or options.
2. The terms **“date of grant”** or **“grant date”** refer to the grant date determined for financial statement reporting purposes pursuant to *SSAP No. 104R—Share-Based Payments*.

Column 3	–	Salary	The dollar value of the base salary (cash and non-cash) paid to the named officer or employee during the fiscal year covered.
Column 4	–	Bonus	The dollar value of any bonus (cash and non-cash) paid to the named officer or employee during the fiscal year covered.
Column 5	–	Stock Awards	For awards of stock, the aggregate grant date value computed in accordance with <i>SSAP No. 104R—Share-Based Payments</i> .
Column 6	–	Option Awards	For awards of options, with or without tandem SARs (including awards that subsequently have been transferred), the aggregate grant date value computed in accordance with <i>SSAP No. 104R—Share-Based Payments</i> .
Column 7	–	Sign-on Payments	All compensation received as a result of the acceptance of an employment offer.
Column 8	–	Severance Payments	Any termination, including without limitation through retirement, resignation, severance or constructive termination (including a change in responsibilities) of such executive officer’s employment with the reporting entity’s and its subsidiaries

Column 9 – All Other Compensation

All other compensation for the covered fiscal year that the reporting entity could not properly report in any other column. Each compensation item that is not properly reportable in other columns, regardless of the amount of the compensation item, must be included.

Such compensation must include, but is not limited to:

- Perquisites and other personal benefits, or property, unless the aggregate amount of such compensation is less than \$10,000;
- All “gross-ups” or other amounts reimbursed during the fiscal year for the payment of taxes;
- Reporting entity contributions or other allocations to vested and unvested defined contribution plans;
- A change in control of the reporting entity;
- The dollar value of any insurance premiums paid by, or on behalf of, the reporting entity during the covered fiscal year with respect to life insurance to the benefit of a named officer or employee; and
- The dollar value of any dividends or other earnings paid on stock or option awards, when those amounts were not factored into the grant date fair value required to be reported for the stock or option award.

Part 3

Director Compensation

Reporting entities shall also disclose all compensation paid to, or on behalf of, all directors, other than full-time officers and employees of the reporting entity whose total compensation included service as a director and is disclosed under Part 2. Amounts disclosed must include all compensation paid for services on board and committees, as well as any other compensation for any other activity or service, such as consulting agreements.

Part 4

Provide a narrative description of any material factors necessary to gain an understanding of the information disclosed in the Part 2 and Part 3 tables.

**LIFE, HEALTH AND ANNUITY GUARANTY ASSOCIATION MODEL ACT ASSESSMENT BASE
RECONCILIATION EXHIBIT**

The exhibit for any state, District of Columbia and Puerto Rico in which the company is licensed should be submitted to that jurisdiction. In addition, an exhibit should be prepared for any state, District of Columbia and Puerto Rico in which the company received any direct premiums or deposits. DO NOT SUBMIT exhibits for American Samoa, Guam, U.S. Virgin Islands, Canada, Northern Mariana Islands and other alien jurisdictions. A copy of each jurisdiction and a grand total page for the exhibits that are submitted should be sent to the state of domicile and the NAIC Support and Services Office.

Only companies that are members of the life, health and annuity guaranty associations should complete this exhibit. If a company is unsure if it is a member of a life, health and annuity guaranty association, it should contact the state life, health and annuity guaranty associations in its state of domicile or state(s) where it is licensed to write life, health and annuity business.

For the purpose of these instructions, references to Schedule T apply to the Life and Health blank and references to the Exhibit of Premiums and Losses apply to the Property blank.

The columnar headings correspond to the annual statement, Schedule T (Life or Health blank) or Exhibit of Premiums and Losses (Property blank) as follows:

Health Blank Schedule T Column Reference	<u>Col. 6</u> Life & Annuity Premiums & Other Considerations (In part)	<u>Col. 6</u> Life & Annuity Premiums & Other Considerations (In part)	<u>Col. 2-5</u> Accident and Health Insurance Premiums	<u>Col. 9</u> Deposit-type Contract Funds	<u>Col. 6</u> Life & Annuity Premiums & Other Considerations (In part)
Base Exhibit	<u>Col. 1</u> Life Insurance Premiums	<u>Col. 2</u> Annuity Considerations	<u>Col. 3</u> A & H Premiums	<u>Col. 4</u> Deposit-Type Contract Funds	<u>Col. 4</u> Other Considerations
Life Blank Schedule T Column Reference	<u>Col. 2</u> Life Contracts – Life Insurance Premiums	<u>Col. 3</u> Life Contracts – Annuity Considerations	<u>Col. 4</u> Accident and Health Insurance Premiums	<u>Col. 7</u> Deposit-Type Contract Funds	<u>Col. 5</u> Other Considerations
Base Exhibit	<u>Col. 1</u> Life Insurance Premiums	<u>Col. 2</u> Annuity Considerations	<u>Col. 3</u> A & H Premiums	<u>Col. 4</u> Deposit-Type Contract Funds	<u>Col. 4</u> Other Considerations
Property Blank Exhibit of Premiums and Losses (Statutory Page 14) Column and Lines Reference			<u>Col. 1</u> Direct Premiums Written Lines 13-15.8 (Various Accident and Health Insurance Premiums)		
Base Exhibit	<u>Col. 1</u> Life Insurance Premiums	<u>Col. 2</u> Annuity Considerations	<u>Col. 3</u> A & H Premiums	<u>Col. 4</u> Deposit-Type Contract Funds	<u>Col. 4</u> Other Considerations

In the event that this detailed information is not available in the reporting entity's accounting records, recognized allocation to estimation processes may be utilized if consistently applied.

Adjustments to the exhibit may be required by states that have not adopted the *Life and Health Insurance Guaranty Association Model Act* (#520).

PURPOSE OF THE LIFE, HEALTH AND ANNUITY GUARANTY ASSOCIATION
MODEL ACT ASSESSMENT BASE RECONCILIATION EXHIBIT

It is desirable to display on one page the various types of annuity considerations, deposit-type contract funds and other considerations received directly by the reporting entity, separated by state, as is currently reported in the applicable Schedule T or Exhibit of Premiums and Losses. However, it is not possible to use such data for state guaranty association assessments without further modification. This is because of: (a) the limits placed on certain considerations for assessment purposes; (b) the variations by states in designation of "funds" for assessments; and (c) other factors that are interpreted differently by the individual states.

As a result, the NAIC has developed a specific exhibit, the Life, Health & Annuity Guaranty Association Model Act Assessment Base Reconciliation Exhibit ("Base Reconciliation Exhibit") which uses the state figures in Schedule T or Exhibit of Premiums and Losses as the starting point for development of the guaranty association assessment base (as defined in the NAIC *Life and Health Insurance Guaranty Association Model Act* (#520)). States should not use Schedule T or Exhibit of Premiums and Losses as the basis for guaranty association assessments, but instead use the Base Reconciliation Exhibit as the starting point.

Introduction

These instructions are intended to assist companies in completing the Life, Health and Annuity Guaranty Association Model Act Assessment Base Reconciliation Exhibit (Base Reconciliation Exhibit) and Adjustments to the Life, Health and Annuity Guaranty Association Model Act Assessment Base Reconciliation Exhibit (Adjustment Exhibit).

The Base Reconciliation Exhibit starts with premiums, deposit-type contract funds and other considerations as reported in the applicable Schedule T or Exhibit of Premiums and Losses and then makes necessary adjustments (both positive and negative) to establish the premium assessment base as defined by the current Model #520. The Base Reconciliation Exhibit must be completed for each state (as well as the District of Columbia and Puerto Rico) in which the company is licensed or does business.

Should you have questions about how to fill out the Base Reconciliation Exhibit, and the answers are not provided in the instructions below, you may wish to consult the current Model #520, particular State Guaranty Acts, the *Annual Statement Instructions* manual, your company attorney, particular State Insurance Departments or particular State Guaranty Association Administrators.

The Base Reconciliation Exhibit has four columns: Column 1 is for all individual and group life insurance premiums; Column 2 is for all individual and group allocated annuity amounts (whether called premiums, deposit-type contract funds or other considerations); Column 3 is for all individual and group accident and health premiums; and Column 4 is for all unallocated annuity amounts (whether called premiums, deposit-type contract funds or other considerations).

Base Reconciliation Exhibit

Premiums, Considerations and Deposits from Schedule T or the Exhibit of Premiums and Losses

Line 1 – **These amounts must exactly match the amounts reported by your company on Schedule T or the Exhibit of Premiums and Losses for all lines of business.**

Modifications to Premiums, Considerations and Deposits

Lines 2 through 10 are required to adjust amounts reported on your company's Annual Statement Schedule T to its Assessable Premium Base and are critical in transforming premium data prepared for Annual Statement purposes into data suitable for Guaranty Association purposes.

- Line 2 – Enter any life, annuity or health premiums, deposit-type contract funds and other considerations received by your company that were not reported on Schedule T or the Exhibit of Premiums and Losses and, therefore, not included in Line 1 above. The total of Line 2 should equal Line 2.1 + Line 2.2. Such amounts should be reported in the appropriate column based on whether such amounts relate to life insurance, annuity, accident and health, or annuity and deposit-type business. Include all amounts received for insurance contracts, Guaranteed investment contract receipts, universal life insurance deposits and any other amounts received by the company for covered contracts that were not reported on the company's Schedule T or the Exhibit of Premiums and Losses (sometimes referred to as FASB 97 deposit reporting) must be reported on Line 2. Annuity amounts entered on Lines 1 and 2 must include, but are not limited to, amounts received for immediate or deferred annuity contracts, structured settlement agreements, lottery contracts, group annuity contracts, guaranteed interest or investment contracts, deposit administration contracts and allocated or unallocated funding obligations. In addition, allocate by state and include on Line 2 amounts reported on the applicable Schedule T as Company Contributions for Employee Benefit Plans (Line 60 (Health blank) or 90 (Life blank) of Schedule T), Dividends Applied to Purchase Paid-up Additions and Annuities, Dividends Applied to Shorten Endowment or Premium-Paying Period, Premium or Annuity Considerations Waived Under Disability or Other Contract Provisions, and Aggregate Other Amounts Not Allocable by State.
- Line 2.1 – Enter fees and charges for investment management, administration and contract guarantees from the Separate Account associated with variable contracts reduced by any contractholder dividends representing a return of such fees and charges. Specifically, in the case of variable annuity products, those portions of fees and charges paid to the general account with respect to living and death benefit guarantees, M&E charges and annual contract charges. In the case of variable life products with guaranteed death benefits, the portion of fees/charges paid to the general account would include the cost of insurance in addition to M&E charges and annual contract charges. Because the fees and charges are reportable by state, a reporting entity may use either a seriatim, i.e., specific contract identification, or state an allocation method. An appropriate allocation method would be to calculate a ratio of fee income to total variable premium for the product line and multiply the ratio by the state specific variable premium.
- Line 2.2 – Enter any other life, annuity or health premiums, deposit-type contract funds and other considerations received by your company that were not reported on Schedule T or the Exhibit of Premiums and Losses.

- The primary purpose of Lines 3.1 to 3.99 is to add back amounts that, as a result of statutory accounting practices, were deducted from the amounts reported on Line 1 or 2. For the most part, these deductions represent current year benefit payouts, transfers, surrenders or withdrawals.

Enter any amounts deducted prior to determining amounts included in Lines 1 and 2. Companies reporting net amounts on Lines 1 and 2 must complete Lines 3.1 through 3.99 in order to provide gross premiums and deposits. Amounts reported on these lines should include transfers to separate accounts, GIC rollovers to other companies, surrenders, excess interest, and any other amounts deducted from or not included in the company's gross premium figures. Amounts that were reported as "Deposit-Type Contract Funds and Other Considerations" (Column 4) in the year of receipt and transferred in the current year to "Annuity Considerations" (Column 2), as individuals are "annuitized" are to be included on Line 3.3 of Column 4 if these amounts were deducted from the amounts reported on Lines 1 or 2.

As an example, most pension plan unallocated annuities provide for the payment of an annuity payout benefit ("annuitization") for an individual. In the year of the receipt of the consideration for the unallocated annuity, that consideration, subject to limitations, is to be included in the total assessment base reported in Line 11, Column 4. In the year of annuitization, the amounts transferred to fund the annuity payout benefits are to be included in the total assessment base reported in Line 11, Column 2. There should be no corresponding reduction to the total assessment base reported in Line 11, Column 4 for the amount transferred to fund the annuitization to the extent that such amounts would not have been included in an assessment base. When an annuity payout benefit is, pursuant to that contract, purchased for an individual from monies previously deposited with the Company, it is assumed that there is no new contract rather, it is an internal rollover of funds, i.e., no new funds have been received by the Company.

In order to correctly report amounts subject to assessment in Columns 2 and 4, companies should maintain transaction level detail for each deposit type contract. On a cumulative basis, the assessable premium can never be less than \$0 on any given contract. For example, the following will illustrate the correct reporting of deposit-type contracts that partially or fully annuitize in a model act state (i.e., assessable premium up to \$5 million per unallocated annuity contract). The amount reported on Line 7.4 is a balancing amount such that the assessable premium for any unallocated contract never exceeds \$5 million nor is less than \$0 over the life of the contract. The same approach applies to any state that covers unallocated annuities, irrespective of the limits. In this example, there is a \$50 million unallocated contract in Year 1 and the company reports \$5 million in Column 4. If the contract is completely annuitized in year 2, the company must report \$50 million in Column 2 as allocated premium and \$50 million on Line 3.3 (as an add-back) in the unallocated premium column. The Company should report a deduction of \$5 million on Line 7.4 in Column 4 in the second year, since it has reported the full \$50 million received in Column 2 by the end of the second year. On a cumulative basis, \$0 is reported in Column 4. The Company has not subjected to assessment more premium than it has received.

(Millions of Dollars)

Example Contract	YEAR 1			YEAR 2		
		Col. 2	Col. 4		Col. 2	Col. 4
Deposit	50	X	X	0	X	X
Annuitize	0	X	X	50	X	X
Amt. Rep. Lines 1 & 2	X	0	50	X	50	-50
Amt. Rep. Line 3.3	X	X	0	X	0	50
Amt. Rep. Line 5	X	0	50	X	50	0
Amt. Rep. Line 7.4	X	X	45	X	0	5
Amt. Rep. Line 11	X	0	5	X	50	-5
Cumulative All Years Line 11	X	0	5	X	0	0

Four additional examples will further illustrate the correct reporting of deposit type contracts that partially or fully annuitize in a model act state. In these examples, it can be seen that at any point in time, the Company has never included more in the assessable premium base (Columns 2 and 4 combined) than what was received by the Company over that period of time. Also, the Company never included more than \$5 million of assessable premium in Column 4 at any point in time.

(Millions of Dollars)

Contract #1	Yr 1		Yr 2		Yr 3		Yr 4		Yr 5		Cum	
	Col. 2	Col. 4	Col. 2	Col. 4	Col. 2	Col. 4	Col. 2	Col. 4	Col. 2	Col. 4	Col. 2	Col. 4
Deposit	5	X	5	X	5	X	5	X	5	X	25	X
Annuitize	1	X	3	X	2	X	1	X	8	X	15	X
Amt. Rep. Lines 1 & 2	X	1	X	5	X	2	X	1	X	8	-3	X
Amt. Rep. Line 3.3	X	X	X	3	X	X	X	X	X	8	X	X
Amt. Rep. Line 5	X	1	X	3	X	2	X	1	X	8	5	X
Amt. Rep. Line 7.4	X	X	X	4	X	X	X	X	X	5	X	X
Amt. Rep. Line 11	X	1	X	3	X	2	X	1	X	8	0	X
Cumulative All Years Line 11	X	1	X	4	X	5	X	6	X	7	5	X

For Contract #1, the Company received \$25 million of deposits and included \$20 million in the assessable premium base (\$15 million as annuity considerations and \$5 million as deposit funds) over the five-year period.

(Millions of Dollars)

Contract #2		Yr 1		Yr 2		Yr 3		Yr 4		Yr 5		Cum						
		Col 2	Col 4	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4					
Deposit	10	X	X	10	X	X	5	X	X	5	X	X	35	X	X			
Annuitize	1	X	X	3	X	X	2	X	X	1	X	X	28	X	X	35	X	X
Amt. Rep. Lines 1 & 2	X	1	9	X	3	7	X	2	3	X	1	4	X	28	-23	X	35	0
Amt. Rep. Line 3.3	X	X	1	X	X	3	X	X	2	X	X	1	X	X	28	X	X	35
Amt. Rep. Line 5	X	1	10	X	3	10	X	2	5	X	1	5	X	28	X	X	35	35
Amt. Rep. Line 7.4	X	X	5	X	X	10	X	X	5	X	X	5	X	X	10	X	X	35
Amt. Rep. Line 11	X	1	5	X	3	0	X	2	0	X	1	0	X	28	-5	X	35	0
Cumulative All Years Line 11	X	1	5	X	4	5	X	6	5	X	7	5	X	35	0	X	X	X

For Contract #2, the Company received \$35 million of deposits and included \$35 million in the assessable premium base (\$35 million as annuity considerations and \$0 as deposit funds) over the five-year period.

(Millions of Dollars)

Contract #3		Yr 1		Yr 2		Yr 3		Yr 4		Yr 5		Cum						
		Col 2	Col 4	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4					
Deposit	10	X	X	10	X	X	0	X	X	0	X	X	20	X	X			
Annuitize	1	X	X	3	X	X	2	X	X	1	X	X	8	X	X	15	X	X
Amt. Rep. Lines 1 & 2	X	1	9	X	3	7	X	2	-2	X	1	-1	X	8	-8	X	15	5
Amt. Rep. Line 3.3	X	0	1	X	X	3	X	X	2	X	X	1	X	X	8	X	X	15
Amt. Rep. Line 5	X	1	10	X	3	10	X	2	0	X	1	0	X	8	0	X	15	20
Amt. Rep. Line 7.4	X	0	5	X	X	10	X	X	0	X	X	0	X	X	0	X	X	15
Amt. Rep. Line 11	X	1	5	X	3	0	X	2	0	X	1	0	X	8	0	X	15	5
Cumulative All Years Line 11	X	1	5	X	4	5	X	6	5	X	7	5	X	15	5	X	X	X

For Contract #3, the Company received \$20 million of deposits and included \$20 million in the assessable premium base (\$15 million as annuity considerations and \$5 million as deposit funds) over the five-year period.

(Millions of Dollars)

Contract #4	Yr 1		Yr 2		Yr 3		Yr 4		Yr 5		Cum							
	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4	Col 2	Col 4						
Deposit	5	X	X	5	X	X	5	X	X	5	X	X	25	X	X			
Annuitize	1	X	X	6	X	X	0	X	X	0	X	X	8	X	X	15	X	X
Amt. Rep. Lines 1 & 2	X	1	4	X	6	-1	X	0	5	X	0	5	X	8	-3	X	15	10
Amt. Rep. Line 3.3	X	X	1	X	X	6	X	X	0	X	X	0	X	X	8	X	X	15
Amt. Rep. Line 5	X	1	5	X	6	5	X	0	5	X	0	5	X	8	5	X	15	25
Amt. Rep. Line 7.4	X	X	1	X	X	6	X	X	3	X	X	5	X	X	5	X	X	20
Amt. Rep. Line 11	X	1	4	X	6	-1	X	0	2	X	0	0	X	8	0	X	15	5
Cumulative All Years Line 11	X	1	4	X	7	3	X	7	5	X	7	5	X	15	5	X	X	X

For Contract #4, the Company received \$25 million of deposits and included \$20 million in the assessable premium base (\$15 million as annuity considerations and \$5 million as deposit funds) over the five-year period. Contract #4 is different from Contract #1 in that after Year 2, only \$3 million has been included in Column 4 since \$7 million of the \$20 million of deposits received has annuitized. For Year 3, \$2 million is included in Column 4, bringing the cumulative total to \$5 million, since a total of \$15 million has been received, but only \$7 million has annuitized.

You must provide a clear explanation of any amounts listed on Lines 3.501, 3.502, 3.503, etc. Line 3.99 (Total) should represent the difference between gross and net premiums for each column.

Line 4.1 – Transfer amounts received to fund annuity contracts qualified under Internal Revenue Code Section 403(b) (sometimes referred to as tax-sheltered annuities) from the Annuity Considerations column (Column 2) to the Deposit-Type Contract Funds and Other Considerations column (Column 4). This transfer line should be completed by companies that report 403(b) annuity amounts in the Life Contracts – Annuity Considerations column 3 (Life blank) or Life & Annuity Premiums & Other Considerations – Column 3 in part (Health blank) of Schedule T. All 403(b) amounts in that column should be transferred to Column 4 of the Base Reconciliation Exhibit, whether the 403(b) contract was issued to a governmental or non-governmental policyholder. The amount entered as a negative in the Annuity Considerations column must exactly match the amount entered as a positive in the Deposit-Type Contract Funds and Other Considerations column.

NOTE: In 1995, the NAIC adopted changes to Section 6.A(1)(b) and 6.A(1)(c) of the Model #520 which effectively reclassified contracts issued under a governmental retirement plan established under Section 401, 403(b) or 457 of the U.S. Internal Revenue Code from the unallocated annuity to the allocated annuity account (Non-governmental 401 and 403(b) contracts funded by an unallocated annuity contract remain in the unallocated annuity account.) Although now inconsistent with the adopted change, Base Exhibit, Line 4.1 must continue to be completed in accordance with the instructions in the preceding paragraph since no state has yet adopted this change. Changes to future annual statement instructions, forms or formula charts will be considered at such future date if and when adopted by individual state(s).

- Line 4.2 – Transfer any allocated annuity amounts included in the Deposit-Type Contract Funds and Other Considerations column (Column 4) to the Annuity Considerations column (Column 2), except for amounts received to fund annuity contracts qualified under Internal Revenue Code Section 403(b) contracts. This includes all allocated annuity contracts, regardless of whether the annuity is in deferred or payout status, whether the annuity is group or individual, and whether the annuity is qualified or non-qualified for tax purposes.

According to Model #520, an “unallocated annuity contract means any annuity contract or group annuity certificate that is not issued to and owned by an individual, except to the extent of any annuity benefits guaranteed to an individual by a reporting entity under such contract or certificate.” An annuity is considered allocated unless it is unallocated. Examples of unallocated annuity contracts might be guaranteed investment contracts, deposit administration contracts, and unallocated funding agreements where no contract or agreement issued by the reporting entity, nor any certificate issued by the reporting entity thereunder, guarantees individual benefits to specifically identified individuals.

Group annuities may be allocated or unallocated. (The term “unallocated” is synonymous with the term “group”.) A group contract or certificate that guarantees annuity benefits to an individual (this is not the guarantee typically found in a guaranteed investment contract or deposit administration contract which allows the pension trustee or administrator to purchase an annuity for a plan participant at a guaranteed purchase rate) should be considered allocated. In addition to contracts under which periodic payments are being made to individuals, group annuity contracts should be considered allocated if the reporting entity is obligated under the contract upon the request of an individual (or his or her beneficiary) to make either partial or full cash withdrawal payments, which may be subject to plan or statutory restrictions, to the individual (or his or her beneficiary).

The reporting entity will be considered to be obligated upon the request of an individual to make either partial or full cash withdrawal payments if withdrawals or death benefit payments are made from that participant’s account maintained (by the reporting entity or its designee) under the terms of the group annuity contract and regardless of whether such requests are submitted to the reporting entity directly by the individual (or his or her beneficiary) or indirectly through the plan trustee, administrator, sponsor or contract holder at the direction of the individual. As discussed in Line 4.1, the NAIC adopted a change to Model #520 that reclassifies governmental retirement plans established under Section 401, 403(b) and 457 of the Internal Revenue Code to the allocated annuity account. However, until adopted by a state legislature, 403(b) annuities should remain in the Deposit-Type Contract Funds and Other Considerations column (Column 4) to be consistent with existing statutes that require that these contracts be included with unallocated annuities for assessment purposes where applicable. Note that the amount entered as a negative in the Deposit-Type Contract Funds and Other Considerations column must exactly match the amount entered as a positive in the Annuity Considerations column.

- Line 4.3 – Transfer any unallocated annuity amounts included in the Annuity Considerations column (Column 2) to the Deposit-Type Contract Funds and Other Considerations column (Column 4). The amount entered as a negative in the Annuity Considerations column must exactly match the amount entered as a positive in the Deposit-Type Contract Funds and Other Considerations column.

Development of Amounts Included in Lines 1 Through 5 That Should Be Deducted in Determining the Base

Lines 6 through 9.99 are deductions from assessable premium based on the *Life and Health Insurance Guaranty Association Model Act* (#520) provisions. Companies must be careful not to deduct the same premium or deposits on more than one line. For example, amounts deducted on Line 6.1 as non-guaranteed separate account deposits should not be deducted a second time on Line 7.3 if those separate account deposits represent unallocated annuity deposits for a pension plan contract in excess of \$5 million. Companies may only deduct amounts on Lines 6 through 9.99 (except for amounts on Line 8) to the extent those amounts have been included on Lines 1 through 5 of the Base Reconciliation Exhibit.

Lines 6.01 –
6.99

- Enter amounts received for any portion of a policy or contract not guaranteed by the reporting entity or under which the investment risk is borne entirely by the policy or contract holder. These amounts are those specified at the time of deposit as intended for deposit in separate accounts. Amounts entered on these lines are typically non-guaranteed separate account premiums. DO NOT INCLUDE on these lines amounts transferred to any guaranteed separate accounts. Two types of annuity contracts that should NOT be reported on Line 6 are: (i) modified guaranteed annuities, market-adjusted annuities, or other contracts where the amounts payable on at least one future date do not (or may not) depend solely on the investment performance of assets in the separate accounts, and (ii) guaranteed investment contracts issued to fund pension plans even if there are not mortality guarantees or only incidental mortality guarantees. Such contracts are not properly included on Line 6 since the reporting entity retains an investment risk.

Amounts entered on Line 6 should correspond to amounts reported on the Annual Statement of Separate Accounts to the extent amounts are included on Lines 1 through 5 of the Base Reconciliation Exhibit. Specify deductions and indicate where such amounts were reported in the Annual Statement. Lines 6.1 – 6.99 should not include transfers to a separate account except to the extent such transfers represent current year premiums included on Lines 1 through 5 of the Base Reconciliation Exhibit. Companies must specifically identify deductions on Lines 6.01 through 6.99 and indicate where such amounts are reported in the Annual Statement and where they are reported on Lines 1 through 5 of the Base Reconciliation Exhibit.

Lines 7.1 –
7.4

- Enter unallocated amounts that meet the descriptions provided on Lines 7.1, 7.2 and 7.3.

Line 7.1

- Allows a deduction for any unallocated annuity contract that is not issued to or in connection with a specific employee, union or association of natural persons benefit plan or a government lottery. An example of an appropriate Line 7.1 deduction would be amounts received to fund a municipal guaranteed investment contract.

Line 7.2

- Allows a deduction for any unallocated annuity contract issued to an employee benefit plan protected under the Federal Pension Benefit Guaranty Corporation (PBGC). Employee benefit plans protected by the PBGC are defined benefit plans only and do not include defined contribution plans.

Line 7.3

- Allows a deduction for unallocated annuity premiums in excess of \$5 million for unallocated government lotteries and for any unallocated employee, union or association of natural persons benefit plans that is not: (a) governmental retirement plan established under Sections 401, 403(b) or 457 of the U.S. Internal Revenue Code or (b) protected under the Federal Pension Benefit Guaranty Corporation. Line 7.3 should only include those amounts in excess of \$5 million. For example, for a \$15 million guaranteed investment contract issued to an employee benefit plan, the company should report \$10 million (i.e., amounts in excess of \$5 million) on Line 7.3. Do not include on Lines 7.1, 7.2 or 7.3 amounts that have been reported as transfers or deductions on any other lines (e.g., Lines 4.2, 6, 7.1, 7.2 or 7.3).

Line 8 – Enter dividends and experience rating credits, but only if such amounts were not guaranteed in advance. Examples of items that might be reported on Line 8 include: (i) non-guaranteed amounts that constitute a return of premiums collected in the current year and paid out of divisible surplus; and (ii) non-guaranteed experience rating credits that were not already deducted in determining Lines 1 and 2. Excess interest should not be deducted as dividends.

Lines 9.01 – 9.99 – Enter any other deductible amounts with a clear explanation of the nature of such deduction on Lines 9.01, 9.02, 9.03, etc. An example of an appropriate deduction is the premiums received for the Federal Employee Health Benefits Plan contracts in the Accident and Health column (Column 3). Deductions are not permitted for premiums received for the Federal Employee Group Life Insurance. Line 9 should not be used as a substitute for deductions that are to be reported on any of the above lines. Deductions are not permitted in the first three columns for amounts received in excess of coverage limits specified in the Guaranty Laws (i.e., a reporting entity cannot deduct amounts received or contract values in excess of \$100,000 related to allocated annuity contracts).

Model Act Base

Line 11 – Line 11 equals Line 5 minus Line 10.

Not for Distribution

**ADJUSTMENTS TO THE
LIFE, HEALTH AND ANNUITY GUARANTY ASSOCIATION
MODEL ACT ASSESSMENT BASE RECONCILIATION EXHIBIT**

To be filed on or before April 1.

Introduction

The purpose of the Adjustments to the Life, Health and Annuity Guaranty Association Model Act Assessment Base Reconciliation Exhibit (Adjustments Exhibit) is to collect premium information needed by State Guaranty Associations to make assessments. The Adjustments Exhibit must be prepared with the same care and accuracy that would be used in preparing the Annual Statement, since the information is being provided to the Guaranty Fund Associations.

These instructions are intended to assist companies in completing the Adjustments Exhibit. **COMPANIES MUST READ THESE INSTRUCTIONS CAREFULLY AND REFER TO THE RELEVANT GUARANTY ASSOCIATION ACTS, WHERE APPROPRIATE.**

Only companies that are members of the life, health and annuity guaranty association should complete this exhibit. If a company is unsure if it is a member of a life, health and annuity guaranty association, it should contact the state life, health and annuity guaranty associations in its state of domicile or state(s) where it is licensed to write life, health and annuity business.

The Adjustments Exhibit has four columns: Column 1 is for all individual and group life insurance premiums; Column 2 is for all individual and group allocated annuity amounts (whether called premiums, deposits, or considerations); Column 3 is for all individual and group accident and health premiums; and Column 4 is for all unallocated annuity amounts (whether called premiums, deposits or considerations). However, the Adjustments Exhibit requires annuity information only for states that have not adopted the most recent *Life and Health Insurance Guaranty Association Model Act (#520)*. Companies are required to complete each line of the Adjustments Exhibit for all states, District of Columbia and Puerto Rico in which they were licensed or had business during the reporting year, except for those states that use the Base Reconciliation Exhibit for their respective assessment premium base (these states may be identified by referring to the respective assessment premium base formulas). **DO NOT SUBMIT** the Adjustments Exhibit for American Samoa, Guam, U.S. Virgin Islands, Canada, Northern Mariana Islands and other alien jurisdictions. If your company writes only life and/or accident and health insurance, there is no need to submit the Adjustments Exhibit (you may enter any miscellaneous adjustment your company may have to life and accident and health business on Line 9 of the Base Exhibit pursuant to the applicable instructions.)

Should you have questions about how to fill out the Adjustments Exhibit, and the answers are not provided in the instructions below, you may wish to consult the Model #520, particular State Guaranty Acts, the *Annual Statement Instructions*, your company attorney, particular State Insurance Departments, or particular State Guaranty Association Administrators.

Adjustments to the Base Reconciliation Exhibit

All Lines (except Lines 5.3, 6.4 and 9) of Column 4 (Unallocated Annuity Considerations and Other Unallocated Fund Deposits) and Line 2 of Column 2 (Allocated Annuity and Other Allocated Fund Deposits) must be completed for all states in which your company is licensed or did business during the survey year, except for those states that use the Base Reconciliation Exhibit for their respective assessment premium base. (These states may be identified by referring to the respective assessment premium base formulas.) **DO NOT SUBMIT** the Adjustments Exhibit for American Samoa, U.S. Virgin Islands, Canada, Northern Mariana Islands and other alien jurisdictions.

Deductions related to unallocated annuity contracts **MUST** be detailed on Lines 3 through 9, where appropriate. Deductions on Line 10 related to amounts received on unallocated annuity contracts **WILL NOT** be allowed.

- Line 1 – Model Act Base
- The amount from Line 11 of the Base Reconciliation Exhibit should be transferred to Line 1 of the Adjustments Exhibit.
- Line 2 – All 403(b) annuities are included in Column 4 (Unallocated Annuity and Other Unallocated Fund Deposits) on the Base Reconciliation Exhibit and must be transferred to Column 2 (Allocated Annuity and Other Allocated Fund Deposits) for certain states that have not adopted the most recent Model #520 in its entirety. The amount to be transferred from Column 4 to Column 2 represents the amount of 403(b) annuity premiums included in Line 1 of the Adjustments Exhibit, regardless of whether it was originally reported in Column 2 or Column 4 of the Base Reconciliation Exhibit. Those companies that originally reported 403(b) premiums in Column 4 of the Base Reconciliation Exhibit must transfer such amounts to Column 2 even though no original transfer was required on Line 4.1 of the Base Reconciliation Exhibit.
- Lines 3.1 and 3.2 – Companies that have unallocated funding obligations that are not issued for or in connection with a specific employee, union or association of natural persons benefit plan or government lottery (Line 7.1 of the Base Reconciliation Exhibit) must report such amounts on Lines 3.1 and 3.2. Line 3.2 should include any amounts reported on Line 3.1.
- Lines 4.1, 4.2, 4.3 and 4.5 – Companies that have unallocated funding obligations issued to fund government lotteries or employee, union or association of natural persons benefit plans that are NOT: (a) governmental retirement plans established under Sections 401, 403(b) or 457 of the U.S. Internal Revenue Code, or (b) protected by the Federal Pension Benefit Guaranty Corporation must report such amounts on Lines 4.1, 4.2 and 4.3. Line 4.4 equals the sum of Lines 4.1, 4.2 and 4.3. Lines 4.1, 4.2 and 4.3 are mutually exclusive. Line 4.5 needs to be completed for Minnesota business only.
- Lines 5.1, 5.2, 5.3 and 5.4 – Companies that have unallocated funding obligations issued to fund governmental retirement plans established under Sections 401 and 403(b) of the U.S. Internal Revenue Code must report such amounts on Lines 5.1, 5.2 and 5.3. Line 5.2 should include the amounts reported on Line 5.1. Line 5.3 needs to be completed for New Jersey business only. Line 5.4 needs to be completed for Minnesota business only.
- Lines 6.1, 6.2, 6.4 and 6.5 – Companies that have unallocated funding obligations issued to fund governmental retirement plans established under Section 403(b) of the U.S. Internal Revenue Code must report such amounts on Lines 6.1 and 6.2. Line 6.3 equals the sum of Lines 6.1 and 6.2. Lines 6.1 and 6.2 are mutually exclusive. Line 6.4 needs to be completed for New Jersey business only. Line 6.5 needs to be completed for Minnesota business only.
- Lines 7.1, 7.2 and 7.3 – Companies that have unallocated annuity contracts issued to an employee benefit plan protected by the Federal Pension Benefit Guaranty Corporation (Line 7.2 of the Base Reconciliation Exhibit) must report such amounts on Lines 7.1 and 7.2. Line 7.2 should include the amounts reported on Line 7.1. Line 7.3 needs to be completed for New Jersey business only.
- Line 8 – Companies that have unallocated funding obligations issued to fund government lotteries must report such amounts up to \$5 million per contract holder. This line should be completed for New Jersey business only.

- Line 9 – Companies that have unallocated funding obligations that fund employee or association of natural persons benefit plans in New Jersey in excess of \$2 million need to report receipts up to \$5 million per contract. This line should be completed for New Jersey business only.
- Line 10 – Aggregate Write-ins for Other Deductions
- Enter the total of the write-ins listed in schedule “Details of Write-ins Aggregated at Line 10 for Other Deductions.”
- Line 11 – Represents the preliminary assessment base calculation for those states that have not adopted the most recent Model #520.

Details of Write-ins Aggregated at Line 10 for Other Deductions

The company must provide a clear explanation of the amounts included on Line 10. Amounts deducted on any other lines on the Base Reconciliation Exhibit or Adjustments Exhibit should not be reported here, since to do so would amount to a duplicate deduction. Line 10 should not be used as a substitute for deductions that are to be reported on any of the above lines. In addition, deductions are not permitted in the first three columns for amounts received in excess of coverage limitations specified in the Guaranty Laws (e.g., a reporting entity cannot deduct amounts received or contract values in excess of \$100,000 related to allocated annuity contracts).

NOTE: Cross check for Adjustments Exhibit Lines 3.2, 4.3 and 7.2. Column 4

The aggregate amounts on Adjustments Exhibit Lines 3.2, 4.3 and 7.2 should equal the aggregate of the amounts on Base Exhibit Lines 7.1, 7.2 and 7.3 plus the amount reported on Base Exhibit Line 3.3.

Not for Distribution

SUPPLEMENTAL INVESTMENT RISKS INTERROGATORIES

This set of Supplemental Interrogatories is to assist regulators in identifying and analyzing the risks inherent in the entity's investment portfolio. The Supplemental Investment Risks Interrogatories apply only to general account assets. These lines were determined based upon the investment categories contained in the NAIC Statutory Statement and considered as invested assets. The reported amounts are to be consistent with net admitted amounts reported by the entity in the statement and supporting schedules, not on a consolidated basis. Compute the percentage calculations by dividing the reported amount by the total admitted assets reported in Line 1 of the Interrogatories unless otherwise indicated. It is recommended that the first step in responding to this set of Interrogatories is for the person preparing this document to read through the Interrogatories to gain an understanding of the reporting requirements.

All reporting entities must answer Interrogatories 1 through 4, 11 through 16, 18, 19 and, if applicable 20 through 23. Answer each Interrogatory 5 through 10 only if the reporting entity's aggregate holdings in foreign investments as addressed in Interrogatory 4 equals or exceeds 2.5% of the reporting entity's total admitted assets. Answer Interrogatory 17 only if the reporting entity's aggregate holdings in mortgage loans as addressed in Interrogatory 16 equals or exceeds 2.5% of the reporting entity's total admitted assets. For Life/Fraternal blank, responses are to exclude Separate Accounts. For the Property/Casualty blank, responses are to exclude Protected Cell Accounts.

If listing a Supranational, put Supranational and the union or member on the line (Example: Supranational – World Trade Organization).

The following definitions apply to interrogatories 4 through 10, unless otherwise defined by state statute.

Foreign investment:	An investment in a foreign jurisdiction, or an investment in a person, real estate or asset domiciled in a foreign jurisdiction. An investment shall not be deemed to be foreign if the issuing person, qualified primary credit source or qualified guarantor is a domestic jurisdiction or a person domiciled in a domestic jurisdiction, unless: <ul style="list-style-type: none">(a) The issuing person is a shell business entity; and(b) The investment is not assumed, accepted, guaranteed or insured or otherwise backed by a domestic jurisdiction or a person, that is not a shell business entity, domiciled in a domestic jurisdiction.
Domestic jurisdiction:	The United States, Canada, any state, any province of Canada or any political subdivision of any of the foregoing.
Foreign jurisdiction:	A jurisdiction other than a domestic jurisdiction.
Shell business entity:	A business entity having no economic substance, except as a vehicle for owning interests in assets issued, owned or previously owned by a person domiciled in a foreign jurisdiction.
Qualified guarantor:	A guarantor against which a reporting entity has a direct claim for full and timely payment, evidenced by a contractual right for which an enforcement action can be brought in a domestic jurisdiction.
Qualified primary credit source:	The credit source to which a reporting entity looks for payment as to an investment and against which a reporting entity has a direct claim for full and timely payment, evidenced by a contractual right for which an enforcement action can be brought in a domestic jurisdiction.
Supranational:	Entities with more than one sovereign government as a member

Line 1 – Report the reporting entity’s total admitted assets as reported on Page 2 of the annual statement.

Report the total net admitted assets for the current year, Page 2, Assets, Column 3, excluding Separate Account, Protected Cell or Segregated Account business.

Line 2 – Report the single 10 largest exposures to a single issuer/borrower/investment.

Determine the ten largest exposures by first, aggregating investments from all investment categories (except the excluded categories) by issuer. The first six digits of the CUSIP number can be used as a starting point; however, please note that the same issuer may have more than one unique series of the first six digits of the CUSIP. For example, the reporting entity owns bonds issued by the XYZ Company of \$500,000 and common stock of the XYZ Company of \$600,000. In addition the reporting entity has a mortgage loan to the XYZ Company of \$300,000. The total exposure to Issuer XYZ Company is \$1.4 million (\$500,000+\$600,000+\$300,000).

For funds that are not diversified within the meaning of the Investment Company Act of 1940, insurance reporting entities are required to identify actual exposures and aggregate those exposures with directly held investments to determine the 10 largest exposures. For example, if a reporting entity directly holds a significant number of investments in Exxon Mobil and holds a non-diversified closed-end fund with a high concentration of Exxon Mobil, the reporting entity shall aggregate the direct investments with the investments in the closed-end funds to determine the aggregate investment risk to Exxon Mobile.

SEC registered investment funds are required by law to disclose holdings within 60 days following the fund’s fiscal quarter end. Insurers who own funds classified as “non-diversified” are to use the last publicly available fund holding disclosure to account for holdings which should be included in their Top 10 holdings.

Exclude: U.S. government securities (Part Six, Section 2(e)), U. S. government agency securities (Part Six, Section 2(e)).

Those U. S. Government money market funds (Part Six, Section 2(f)) listed in the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* as exempt;

Property occupied by the company;

Policy loans

All SEC and foreign registered funds (open-end, closed-end, UIT and ETFs) and common trust funds that are diversified within the meaning of the Investment Company Act of 1940 [Section 5(b) (1)].

In Column 2 list the categories of securities that are included in the total for each issuer (e.g., bonds, mortgage loans, etc.)

Line 3 – Report, by NAIC designation, the amounts and percentages of the reporting entity’s total admitted assets held in bonds and preferred stocks.

Report the total amount for each subcategory. The amounts reported in the bond subcategories should be consistent with the amounts reported in Schedule D, Part 1A, Section 1, Column 7, Lines 11.1 – 11.6. Schedule D, Part 1A, Section 1 is reported gross and will not tie to this line if any amounts are reported and nonadmitted for bonds and preferred stocks on the asset page.

Line 4 – Report the amounts and percentages of the reporting entity’s total admitted assets held in foreign investments (regardless of whether there is any foreign currency exposure) and unhedged foreign currency exposure.

- Line 4.02 – Report the aggregate amount of foreign investments as determined by the rules or statutes of the state of domicile (regardless of whether there is any foreign currency exposure).
- Line 4.03 – Report the portion of the aggregate amount of foreign investments that supports insurance liabilities denominated in that same foreign currency.
- The amount reported in 4.03 should be included in all answers to Lines 5 through 10.
- Line 4.04 – Report the amount of the insurance liabilities associated with the investments reported in 4.03 and that are denominated in the same currency.

Lines 5-10 should be answered only if the reporting entity's aggregate foreign investments exceed 1% of total admitted assets (response to 4.01 is no). The NAIC designations for Lines 5, 6, 8 and 9 relate to country ratings, not investment ratings. If the country does not have a rating, include the investment in the NAIC-3 or below category.

- Line 5 – Report the aggregate foreign investment exposure (regardless of currency exposure) categorized by the country's NAIC sovereign designation. Aggregate foreign investment first by foreign jurisdiction and then by NAIC sovereign designation.

The sovereign ratings and designation equivalents are available on the NAIC Web site.

- Line 6 – Within each of the following three categories of NAIC country sovereign designations, which are available on the NAIC Web site (1, 2, and 3 or below), identify the two countries in which the company has its largest aggregate foreign investment exposures (regardless of currency exposure), and report the dollar value and percentage of company investments issued within each of those countries.

- Line 8 – Report the aggregate unhedged foreign currency exposure categorized by NAIC sovereign designation. Aggregate unhedged foreign currency exposures first by foreign jurisdiction and then by NAIC sovereign designation.

The sovereign ratings and designation equivalents are available on the NAIC Web site.

- Line 9 – Within each of the following three categories of NAIC country sovereign designations, which are available on the NAIC Web site (1, 2, and 3 or below), identify the two countries in which the company has its largest aggregate unhedged foreign currency exposures, and report the dollar value and percentage of company investments issued within each of those countries.

- Line 10 – Report the 10 largest non-sovereign (i.e., non-governmental) exposures to a foreign issuer/borrower/ investment.

Determine the ten largest foreign exposures by first aggregating investments from all foreign investment categories by issuer. See example in Line 2. If an investment does not have an NAIC designation, indicate the investment category, e.g., mortgage loan, in the NAIC Designation Column and first indicating any available NAIC designations for that issuer/borrower.

- Line 11 – Report the amounts and percentages of the reporting entity’s total admitted assets held in Canadian investments, including Canadian-currency denominated investments, Canadian insurance liabilities (“Canadian Investments”) and unhedged Canadian currency exposure.
- Line 11.03 – Report the aggregate amount of Canadian Investments that support insurance liabilities denominated in Canadian currency.
- The amount listed in Line 11.03 should be included in all answers to Line 11.
- Line 11.04 – Report the aggregate amount of the insurance liabilities associated with the investments reported in Line 11.03.
- Line 11.05 – Unhedged Canadian Currency Exposure
- If the reporting entity’s aggregate Canadian investments exceed 2.5% of total admitted assets, answer this question.
- Line 12 – Report the aggregate amounts and percentages of the reporting entity’s total admitted assets held in investments with contractual sales restrictions (defined as investments having restrictions that prevent investment from being sold within 90 days).
- Line 12.02 – The aggregate amount reported in this line is limited to investments with contractual restrictions. It does not include, for instance, investments that have procedural requirements to be met prior to sale or internal company restrictions.
- Line 13.02 through 13.11 – Report the amounts and percentages of admitted assets held in the ten largest equity interests (including investments in the shares of mutual funds, preferred stocks, publicly traded equity securities, and other equity securities (including Schedule BA equity interests), and excluding money market and bond mutual funds listed in Part Six, Sections 2(f) and (g) of the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* as exempt or NAIC 1).
- Determine the ten largest equity interests by first aggregating investments included in this line by issuer. For example, the reporting entity owns preferred stock of the XYZ Company of \$600,000 and common stock of the XYZ Company of \$300,000. The total is \$900,000 (\$600,000+\$300,000). The reporting entity also owns bonds issued by the XYZ Company of \$500,000 that are excluded from this calculation because bonds are debt instruments. Other equity securities include partnerships and Limited Liability Companies (LLC) and any other investments reported in Schedule BA classified as equity.
- Line 14 – Report the amounts and percentages of the reporting entity’s total admitted assets held in nonaffiliated, privately placed equities (included in other equity securities) and excluding securities eligible for sale under Securities Exchange Commission (SEC) Rule 144a or SEC Rule 144 without volume restrictions.
- Line 14.02 – The amount reported in this line is a subset of the Line 14 amount, but excludes any public securities, any affiliated equity interests and any securities that can be sold under SEC Rule 144 or under Rule 144a without any volume restrictions.

- Line 14.06 through 14.15 – Report the investments held in the ten largest fund managers, with allocation between funds that are diversified or non-diversified in accordance with the meaning of the Investment Company Act of 1940. This should include all “funds” regardless of the type of fund (private placement, mutual fund, exchange-traded fund, closed-end fund, money market mutual fund, etc), reporting schedule or underlying investments captured in a fund.
- SEC registered investment funds are required by law to disclose holdings within 60 days following the fund’s fiscal quarter end. Insurers who own funds classified as “non-diversified” are to use the last publicly available fund holding disclosure to account for holdings which should be included in their Top 10 holdings.
- Determine the ten largest fund managers by aggregating all “fund” investments by fund manager. For example, if a reporting entity holds a BlackRock SVO-Identified Bond LIF (diversified within the meaning of the Investment Company Act of 1940) reported on Schedule D-1 at \$500,000, four BlackRock diversified mutual funds reported on Schedule D-2-2 at \$2,700,000 and two BlackRock non-diversified closed-end funds totaling \$1,500,000, the reporting entity shall report their aggregated investment in BlackRock funds of \$4,200,000, with \$2,700,000 in diversified funds and \$1,500,000 in non-diversified funds.
- SEC registered investment funds are required by law to disclose holdings within 60 days following the fund’s fiscal quarter end. Insurers who own funds classified as “non-diversified” are to use the last publicly available fund holding disclosure to account for holdings which should be included in their Top 10 holdings.
- Line 15 – Report the amounts and percentages of the reporting entity’s total admitted assets held in general partnership interests (included in other equity securities).
- Line 15.02 – Report the aggregate amount of all general partnership interests reported in Schedule BA. The amount excludes limited partnership interests in any LLC investments.
- Lines 15.03 through 15.05 – Report the details of the three largest general partnership interests if the aggregate amount reported in Interrogatory 15.01 exceeds 2.5% of admitted assets.
- Line 16 – With respect to mortgage loans reported in Schedule B, report the amounts and percentages of the reporting entity’s total admitted assets.
- Line 16.02 through 16.11 – The aggregate mortgage interest represents the combined value of all mortgages secured by the same property or same group of properties.
- Report the details of the ten largest mortgage interests if the aggregate amount exceeds 2.5% of admitted assets.
- The amounts reported in 16.13, 16.14 and 16.16 should be consistent with the corresponding subtotals reported in Column 8 of Schedule B, Part 1.
- Line 17 – Report the aggregate mortgage loans having the indicated loan-to-value ratios as determined from the most current appraisal as of the annual statement date.
- Line 17.01 through 17.05 – For each mortgage loan, determine its loan-to-value ratio and assign it to one of the five loan-to-value categories, separated into residential, commercial or agricultural. Aggregate the amounts for each category and calculate the percent of admitted assets.

- Line 18.02 through 18.06 – Report the amounts and percentages of the reporting entity’s total admitted assets held in each of the five largest investments in one parcel or group of contiguous parcels of real estate reported in Schedule A, excluding property occupied by the company, if the aggregate amount reported in Interrogatory 18.01 exceeds 2.5% of admitted assets.
- Line 19 – Report the amounts and percentages of potential exposure (defined as the amount determined in accordance with the *Annual Statement Instructions*) for mezzanine real estate loans.
- Line 19.01 – If the response is yes, the reporting entity need not complete the remainder of Interrogatory 19.
- Line 20 – Report the amounts and percentages of the reporting entity’s total admitted assets subject to securities lending agreements, repurchase agreements, reverse repurchase agreements, dollar repurchase agreements and dollar reverse repurchase agreements.
- Line 20.01 through 20.05 – Report the aggregate amount for each category at year-end and at the end of each quarter. Calculate the percentage of admitted assets at year-end.
- Line 21 – Report the amounts and percentages for warrants not attached to other financial instruments, options, caps and floors.
- Line 21.01 through 21.03 – Report the aggregate amount for each category and calculate the percentage of admitted assets. The amounts should also agree with amounts reported in Schedule DB.
- Line 22 – Report the amounts and percentages of potential exposure (defined as the amount determined in accordance with the *Annual Statement Instructions*) for collars, swaps and forwards.
- Line 22.01 through 22.04 – Report the aggregate amount for each category at year-end and at the end of each quarter. Calculate the percentage of admitted assets at year-end. The amounts should also agree with amounts reported in Schedule DB.
- Line 23 – Report the amounts and percentages of potential exposure (defined as the amount determined in accordance with the *Annual Statement Instructions*) for futures contracts.
- Line 23.01 through 23.04 – Report the aggregate amount for each category at year-end and at the end of each quarter. Calculate the percentage of admitted assets at year-end. The amounts should also agree with amounts reported in Schedule DB.

VARIABLE ANNUITIES SUPPLEMENT
PARTS 1 AND 2

This supplement is to be filed on or before April 1.

For variable annuities (VAs) with guaranteed benefits, disclose the type(s) of guaranteed benefit(s), the number of contracts or certificates with those benefits, the amount of the benefit base related to each type of benefit, the net amount at risk for death benefits and the guaranteed annual payout for income and withdrawal benefits, the gross amount of the reserve for the guaranteed benefit(s), the portion of the contract/certificate account value related to contract/certificate funds in the General Account or the Separate Account, and the percent of the guaranteed benefit reinsured.

“Type” shall include a summary description of the type of benefit. Examples are provided in the table illustrated below. For those guaranteed benefits that include waiting periods before any benefit can be realized, include the length of the original waiting period in the description.

- A separate line shall be created for each combination of Guaranteed Death Benefit and Guaranteed Living Benefit.
 - See the illustration in the table below for an example.
 - For a category with only one guarantee, show “None” in the other column.
- Each contract/certificate shall be included in one and only one line.
 - For a contract with multiple living benefits, determine the most appropriate classification.

A separate chart shall be prepared for individual contracts and for group contracts with individual certificates. In each chart, show the amount of any reinsurance reserve credit being taken separately for treaties with affiliated captive reinsurers and for other reinsurers.

For purposes of this supplement, a Guaranteed Living Benefit (GLB) is defined as a contract/certificate, agreement or rider in which the insurance entity guarantees specified payouts during a defined period, which may include the lifetime of the insured(s). For VAs, these guaranteed payouts are typically made regardless of the performance of the contractual account value that is used to determine cash surrender values and/or withdrawal benefits.

Column 3	–	Number of Individual (Part 1) Contracts or Group (Part 2) Certificates
Column 4	–	Benefit Base For Guaranteed Death Benefit (Col 1) Report the Benefit Base (defined in the contract/certificate) as of the valuation date as the basis for the guaranteed value. If no guarantee exists, enter \$0.
Column 5	–	Benefit Base For Guaranteed Living Benefit (GLB) (Col 2) Report the Benefit Base (defined in the contract/certificate) as of the valuation date as the basis for the guaranteed value. If no guarantee exists, enter \$0.
Column 6	–	Net Amount at Risk For Guaranteed Death Benefit (Col 1) Death Benefit Net Amount at Risk is defined as the greater of a) zero and b) the difference between the Guaranteed Death Benefit and the Account Value as of the valuation date. Report the sum of the NAR for all contracts/certificates.
Column 7	–	Guaranteed Annual Income Amount For Guaranteed Living Benefit (GLB) (Col 2) Report the total annual income/withdrawal benefits available if the income/withdrawal guarantees were elected on the valuation date. If no GLB/GMWB is available on the valuation date for a particular contract/certificate (e.g. due to a waiting period), use \$0. Note, for GLB and GMWB previously elected, show the guaranteed amount based on the prior elections. For GMAB, use \$0 since this is not an income benefit. Disclosures for GMAB shall be provided in the AG 43 Memorandum.

- Column 8 – Account Value – General Account
- Column 9 – Account Value – Separate Account
- Column 10 – Reserve for Guaranteed Benefits (Total Reserve Less Base Adjusted Reserve)

Total gross reserve for guarantees as defined in AG-43 or VM 21 as applicable in excess of the base contract reserve. Reserves calculated according to AG-43 and VM-21 are allocated to individual contracts or certificates following the guidance of Appendix 6 of AG-43 or Section 8 of VM-21. Report in column 10 the excess of this per policy reserve over the base contract reserve. For base contract reserve, the company may use CSV or Base Adjusted Reserve (defined in Appendix 3, A.3.2D of AG-43 or Section 5, B.4. of VM-21) for that contract or certificate.

- Column 11 &
Column 12 – Percentage of Guaranteed Benefits Reinsured

Show percentage of the Guaranteed Benefit ceded to all reinsurers

- Line 3 – Total Net of Reinsurance

Line 3 Total Net of Reinsurance should equal the total line for Column 10 minus the sum of Line 1 Reserve Credit from Affiliated Captive Reinsurance and Line 2 Reserve Credit from Other Reinsurance.

Illustration:

Type		3 Number of Individual Contracts / Group Certificates	Benefit Base			7 Guaranteed Annual Income Amount for Guaranteed Living Benefit (GLB) (Col 2)	Account Value		10 Reserve for Guaranteed Benefits (Total Reserve Less Base Adjusted Reserve)	Percentage of Guaranteed Benefits Reinsured	
1 Guaranteed Death Benefit	2 Guaranteed Living Benefit		4 For Guaranteed Death Benefit (Col 1)	5 For Guaranteed Living Benefit (GLB) (Col 2)	6 As Amount at Risk For Guaranteed Death Benefit (Col 1)		8 General Account	9 Separate Account		11 Guaranteed Death Benefit	12 Guaranteed Living Benefit
Max Anniversary Value (MAV)*	GMB - 110% of age	93	\$101.4M	\$0	\$3.7M	\$0	\$2.7M	\$93.0M	\$1.5M	60%	40%
75% Roll-up	GMB plus across 83% w/10 yr rating period	312	\$32.6M	\$34.6M	\$1.4M	\$2.4M	\$0	\$31.2M	\$1.0M	100%	100%
Greater of MAV at 75% Roll-up	GMB ROP, 10 yrs	45	\$40.0M	\$35.0M	\$3.0M	\$0M	\$0M	\$37.0M	\$2.0M	0%	0%
Subtotal		1,724	\$174.0M	\$69.6M	\$10.1M	\$2.4M	\$2.7M	\$161.2M	\$4.5M	XXX	XXX
						1. Reserve credit from affiliated captive reinsurance					
						2. Reserve credit from other reinsurance					
						3. Total net of reinsurance					

SCHEDULE SIS

STOCKHOLDER INFORMATION SUPPLEMENT

The Stockholder Information Supplement shall be completed by all stock companies incorporated in the U.S.A. that have 100 or more stockholders. Such supplement shall be filed with the insurance commissioner of the company's domiciliary state as a part of its annual statement. The information required to be contained in this supplement is to be furnished to the best of the knowledge of the company. Where appropriate, the company should obtain the required information, in writing, from its directors or officers and from any person known to the company to be the beneficial owner of more than 10% of any class of its equity securities.

The term "officer" means a president, vice-president, treasurer, actuary, secretary, controller and any other person who performs for the company functions corresponding to those performed by the foregoing officers.

INFORMATION REGARDING MANAGEMENT AND DIRECTORS

1. This information applies to any person who was a director or officer of the company at any time during the year. However, information need not be given for any portion of the year during which such person was not a director or officer of the company.
2. Include under "Other Employee Benefits" information for such items as pension plans, deferred compensation plans, thrift plans, profit-sharing plans, etc., or other contracts, authorizations or arrangements, whether or not set forth in any formal document. Briefly describe such "plans" and the basis upon which directors or officers participate therein, if not previously described in a prior "Stockholder Information Supplement" indicating date thereof. Company cost of benefits accrued or set aside need not be stated with respect to payments computed on an actuarial basis under any plan that provides for fixed benefits on retirement at a specified age or after a specified number of years of service.
3. Information need not be included as to payments made to, or benefits received from, group life or accident insurance, group hospitalization or similar group payments or benefits.
4. If it is impractical to state the amount of the estimated annual benefits proposed to be made upon retirement, the aggregate amount set aside or accrued to date in respect of such payment should be stated, together with an explanation of the basis for future payments.
5. Attach separate sheets if necessary to fully answer questions.

STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES

Column 1	– Name and Title
	Indicate relationship of the person to the company, for example: “director,” “director and vice-president,” “beneficial owner of more than 10% of the company’s common stock,” etc.
Column 2	– Title of Security
	The statement of the title of a security should be such as to clearly identify the security, even though there may be only one class, for example: “common stock,” “4% convertible preferred stock,” etc.
Column 3	– Nature of Ownership
	Under the “Nature of Ownership”, state whether ownership of securities is “direct” or “indirect.” If the ownership is indirect (i.e., through a partnership, corporation, trust or other entity), indicate in a footnote or other appropriate manner the name or identity of the medium through which the securities are indirectly owned. The fact that securities are held in the name of a broker or other nominee does not, of itself, constitute indirect ownership. Securities owned indirectly shall be reported on separate lines from those owned directly and from those owned through a different type of indirect ownership.
Column 4 Column 8	– Number of Shares Owned at the End of Prior Year and – Number of Shares Owned at the End of Current Year
	In the case of securities owned indirectly, the entire amount of securities owned by the partnership, corporation, trust or other entity shall be stated. There may also be indicated in a footnote or other appropriate manner the extent of the security holder’s interest in such partnership, corporation, trust or other entity.
	If a transaction in securities of the company was with the company or one of its subsidiaries, so state. If it involved the purchase of securities through the exercise of options, so state. If any other purchase or sale was effected otherwise than in the open market, that fact shall be indicated. If the transaction was not a purchase or sale, indicate its character, for example, gift, stock dividend, etc., as the case may be.
	Any additional information or explanation deemed relevant by the company should be included as a footnote or in other appropriate manner.
Column 9	– Percentage of Voting Stock Directly and Indirectly Owned or Controlled at the End of the Current Year
	Report the percentage of voting stock directly and indirectly owned or controlled at the end of the current year by each director, officer and/or any other entity/person who directly or indirectly, own, control, hold with the power to vote, or hold proxies representing 10% of more of the voting interests of the entity. See <i>SSAP No. 25—Affiliates and Other Related Parties</i> for the definition of control.

MEDICARE SUPPLEMENT INSURANCE EXPERIENCE EXHIBIT

Medicare Supplement is defined as those forms which are qualified as Medicare Supplement under the Federal Certification Requirements or the NAIC Medicare Supplement Insurance Minimum Standards Model Act and Regulation, or that are filed under other state programs to satisfy separate form filing requirements for Medicare Supplement forms.

This exhibit should be completed on a direct basis and should include all Medicare Supplement insurance acquired through assumption of a block of business. In the event that a policyholder of the company relocates to another state, experience under that policy is to continue to be reported in the state in which the policy was originally issued. The nationwide aggregate earned premium on all Medicare supplement policies should be disclosed in the annual statement General Interrogatory related to Medicare Supplement insurance.

This exhibit is to be completed on a state basis.

In the event that a refiling of any state page is warranted, the amended page should be filed with the NAK and with the state.

1. Experience on policies issued more than three years prior to the reporting year should be shown separately as indicated on the form. For example, for the reporting year ended December 31, 2019 (filed on March 1, 2020), experience on policies issued in 2016 and prior should be shown separately from that of policies issued in 2017 and later. For group insurance, the year of issue should be based on when the certificate was issued, if available. Otherwise, use the master policy year of issue.
2. Allocation of reserves on a state-by-state basis should rely on sound actuarial principles and be consistent as to methodology from year to year.
3. Include membership or policy fees, if any, with premiums earned.
4. Include mass marketed group insurance subject to individual loss ratio standards with individual.
5. Subtract dividends from premiums earned.
6. Do not adjust incurred claims nor premiums earned for changes in policy (additional) reserves.

DEFINITIONS

Column 1 – Compliance with OBRA
Respond with “Yes”, “No” or “NA”, to indicate compliance with OBRA requirements.

Column 3 – Standardized Medicare Supplement Benefit Plan

Means the standard plans A-N as required by Section 9E of the Model Regulation to Implement the NAIC Medicare Supplement Insurance Minimum Standards Model Act. This includes all plans identified as A-N issued prior to a state's revisions to its regulatory program and identified as a standard plan at the time of issue. Policies issued prior to the effective date of this state's revisions to its Medicare supplement regulatory program pursuant to the Omnibus Budget Reconciliation Act (OBRA) of 1990, and no longer offered in a state, should be designated with “P.” Policies not meeting either of these definitions should be designated with “O.” This includes policies issued in MN, MA, and WI (states that qualified for and received a waiver under federal law from the A-N requirements). A policy issued in these three states that did not require changes, as the result of modifications to the state regulatory program should be reported as “O.” All policies identified as “O” must be explained in Medicare Supplement General Interrogatory 4. Theoretically, a policy should never be identified as “O” except in those states receiving a waiver from the A-N requirements.

Column 5	– Plan Characteristics	<p>Means one or more of the following identifiers of the features of a policy or certificate form (all applicable identifiers must be shown).</p> <p>“1” Means inclusion of new or innovative benefits.</p> <p>“2” Means direct response solicited.</p> <p>“3” Means agent solicited.</p> <p>“4” Means underwritten policy or certificate.</p> <p>“5” Means the policy or certificate is guaranteed issued to all applicants.</p> <p>“6” Means the policy is offered to individuals eligible for Medicare or receipt of disability.</p> <p>“7” Means the policy or certificate was assumed from another carrier.</p>
Column 6	– Date Approved	<p>Means the date the policy form was approved for sale in the state by the insurance department.</p>
Column 7	– Date Approval Withdrawn	<p>Means the date the policy form approval was withdrawn by the insurance department.</p>
Column 8	– Date Last Amended	<p>Means the date of approval of a rider or endorsement for this policy form. Do not reflect the date of optional riders added to an individual contract.</p>
Column 9	– Date Closed	<p>Means the date when the policy form is no longer actively marketed or offered for sale in this state.</p>
Column 10	– Policy Marketing Trade Name	<p>Means the title or name under which a policy is (was) marketed.</p>
Columns 12 & 16	– Incurred Claims	<p>Incurred claims equal paid claims plus the change in claim reserves. Claim reserves include only those unpaid liabilities for claims that have been incurred. Incurred claims in this exhibit do not include policy (additional) reserves.</p> <p>The sum of Columns 11 and 15, and the sum of Columns 12 and 16, Lines 0199999 and 0299999 for all states should equal the amounts disclosed in the General Interrogatories, Part 2, Line 1.2 minus Line 1.3 and Line 1.5, respectively.</p>
Columns 14 & 18	– Number of Covered Lives	<p>Means the number of individuals covered under the policy form as of December 31 of the reporting year.</p>

TRUSTEED SURPLUS STATEMENT

The Trusteed Surplus Statement must be completed by each United States branch of a non-U.S. insurer licensed to do any insurance business in any state. The Trusteed Surplus Statement shall be submitted together with its accompanying schedules and the inventory(ies) of trusteed assets. The Trusteed Surplus Statement shall be submitted together with the annual statement (showing business transacted by the U.S. branch of the non-U.S. insurer in the United States) on or before March 1.

Page 1

Affidavit of U.S. Managers, General Agents, or Attorneys

1. The Trusteed Surplus Statement shall be signed and verified by the United States Manager, attorney-in-fact or a duly empowered assistant United States manager of the non-U.S. insurer.
2. In the case of a Canadian life insurance company, the title United States Manager shall refer to the president, vice-president, secretary, or treasurer of the company at its home office in Canada.

Affidavit of Trustee

Each trustee must execute an Affidavit of Trustee.

Page 2

Schedule A – Deposits with State Officers

1. Include only securities deposited with insurance departments or officers of the various states and territories of the United States for the protection of all of the company's policyholders or policyholders and creditors within the United States. For each state and territory, provide a complete and accurate description of each of the assets deposited therein.
2. Exclude special state deposits that are deposited with officers of any state in trust for the security of the policyholders, or policyholders and creditors in that particular state.
3. Line 1.99, minus Line 1.98 where appropriate, should agree with the total of special deposits held for the benefit of all policyholders, claimants and creditors in Schedule E, Part 3 of the annual statement.

Schedules B, C, and D – Deposits With United State Trustees

1. List in Schedules B, C, and D, totals of the assets held by the categories pre-printed therein.
2. A U.S. branch having deposits with two or more U.S. trustees should list the assets deposited with one trustee in Schedule B and the assets deposited with other trustees in Schedules C and D. The trustee holding the assets listed under Schedule B should execute the first Affidavit of Trustee and the trustees holding the assets listed in Schedules C and D should execute the respective affidavits.

In the event that there are more than three separate trusts, attach additional affidavits and corresponding schedules.

3. Each trustee shall submit to the U.S. Manager for inclusion with the Trusteed Surplus Statement, an inventory of each asset held by that trustee. Such inventory shall include the location of the assets (if there is more than one location, indicate which assets are at which location), the complete and accurate description of each asset, the information required to be provided in the Columns 3 through 5 of Schedules B, C, and D of this supplement, and as much additional information as is available (e.g., number of shares of stocks). The subtotal of each category of assets should agree with the amounts shown on Page 2 and Schedules B, C, and D.
4. If market or admitted asset values are not known by the trustee, such information shall be inserted on the inventory by the U.S. Manager.

Page 3

Liabilities and Trusteed Surplus

Line 1 – Total Liabilities

Should agree with the amount reported on Annual Statement Page 3, Line 28 of the annual statement.

Additions to Liabilities

Liabilities used to offset admitted assets in the annual statement.

Line 2 – Aggregate Write-ins for Additions to Liabilities

Enter the total of write-ins listed in schedule “Detail of Write-ins Aggregated at Line 2 for Additions to Liabilities.”

Deductions From Liabilities

No item of deduction should exceed the net asset value thereof allowed in the annual statement of the United States branch.

Line 4 – Amounts Recoverable From Reinsurers

Line 4.1 – Authorized Companies

Include: Any reinsurance recoverable on paid losses from authorized companies that are included in the asset on Page 2, Line 16.1, Column 3 of the annual statement.

Line 4.2 – Unauthorized Companies

Include: Any reinsurance recoverable on paid losses from unauthorized companies that are included in the asset on Page 2, Line 16.1, Column 3 of the annual statement.

Line 4.3 – Certified Companies

Include: Any reinsurance recoverable on paid losses from certified companies that are included in the asset on Page 2, Line 16.1, Column 3 of the annual statement.

Line 7 – Accident and Health Premiums Due and Unpaid

The sum of Lines 6 and 7 should agree with the amount reported on Page 2, Line 15.1 plus Line 15.2, Column 3 of the annual statement.

Line 8 – Contract Loans and Premium Notes

Line 8.1 – Contract loans not exceeding reserves carried on such policies

Should agree with the amount reported on Page 2, Line 6, Column 3 minus the inside amount of the annual statement.

Line 8.2 – Premium notes

Should agree with the amount reported on Page 2, Line 6, inside amount, of the annual statement.

Line 9 – Aggregate Write-ins for Other Deductions From Liabilities

Enter the total of write-ins listed in schedule "Detail of Write-ins Aggregated at Line 9 for Other Deductions From Liabilities."

Line 12 – Trusteed Surplus

The excess of Total Gross Assets reported and the Total Adjusted Liabilities reported on Line 11 of this page. Total Gross Assets are the Total Trusteed Assets reported in Schedules A, B, C and D on Page 2 of the Trusteed Surplus Statement.

Details of Write-ins Aggregated at Line 2 for Additions to Liabilities

List separately each category of additions to liabilities for which there is no pre-printed line on Page 3.

Include: Any credit balances included in deductions from assets on the annual statement.

Details of Write-ins Aggregated at Line 9 for Other Deductions From Liabilities

List separately each category of other deductions from liabilities for which there is no pre-printed line on Page 3.

Include: Commissions and Expense Allowances Due, Experience Rating and Other Refunds Due, and other receivables of reinsurance ceded to authorized insurers that was not included in Line 4.1 above. Amounts receivable from unauthorized insurance companies may be included but only to the extent that a liability for such unauthorized recoverables is included in Line 1 above.

Amounts if any, on Page 2, Line 22, Column 3 of the annual statement as "Net adjustment in assets and liabilities due to foreign exchange rates" which are attributable to trusteed assets.

WORKERS' COMPENSATION CARVE-OUT SUPPLEMENT

The Workers' Compensation Carve-out Supplement shall be completed by those reporting entities that assume or cede workers' compensation carve-out business.

Workers' compensation carve-out business is defined as reinsurance (including retrocessional reinsurance) assumed by life and health insurers of medical, wage loss and death benefits of the occupational illness and accident exposures, but not the employer's liability exposures, of business originally written as workers compensation insurance.

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1 – PREMIUMS EARNED

- Column 3 – Unearned Premiums December 31 Current Year
Refer to *SSAP No. 53—Property and Casualty Contracts – Premiums* for accounting guidance.

PART 2 – PREMIUMS WRITTEN

- Column 5 – Net Premiums Written
Refer to *SSAP No. 62R—Property and Casualty Reinsurance* for accounting guidance.
Should agree with Underwriting and Investment Exhibit, Part 1, Column 1.

PART 3 – LOSSES PAID AND INCURRED

Refer to *SSAP No. 55—Unpaid Claims, Losses and Loss Adjustment Expenses* for accounting guidance.

- Column 1 – Reinsurance Assumed
Include: Unpaid balances due on paid losses reported by ceding entities during the current calendar year.
- Column 2 – Reinsurance Recovered
Include: Amounts receivable from reinsurers on losses paid during the current calendar year.
- Column 4 – Net Losses Unpaid Current Year
Should agree with Underwriting and Investment Exhibit, Part 4, Column 6.
- Column 5 – Net Losses Unpaid Prior Year
Companies that are correcting tabular reserves to exclude medical losses must restate net losses unpaid prior year to reflect the cumulative effect of this change.
- Column 7 – Percentages
Percentages are calculated by dividing Underwriting and Investment Exhibit, Part 3, Column 6 by Underwriting and Investment Exhibit, Part 1, Column 4, and multiplying by 100.

PART 4 – UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES

Refer to *SSAP No. 55—Unpaid Claims, Losses and Loss Adjustment Expenses* for accounting guidance.

- Column 1
& 2 – Reported Losses
- Include: All losses, which have been reported in any way to the Home Office of the company on or before December 31 of the current year. Provision for losses of the current year or prior years, if any, reported after that date would be made in Columns 4 and 5 as Incurred But Not Reported.
- Column 2 – Reinsurance Recoverable from Authorized and Unauthorized Companies
- Amount should represent total recoverable through reinsurance contract excluding IBNR.
- Columns 4
& 5 – Incurred But Not Reported
- IBNR on assumed and ceded business is to be reported separately in these columns.
- Column 5 – Incurred But Not Reported (Ceded)
- Amount should represent total IBNR recoverable through reinsurance contracts.
- Column 6 – Net Losses Unpaid
- Total to agree with Schedule P, Part 1, Column 35, total multiplied by 1000.
- Column 7 – Unpaid Loss Adjustment Expenses
- Report loss adjustment expenses incurred by the reinsurer. Do not report loss adjustment expenses by and assumed from the reinsured.
- Total to agree with Schedule P, Part 1, Column 36, total multiplied by 1000.

SCHEDULE F – REINSURANCE

NOTE: Certified reinsurer status applies on a prospective basis and is determined by the state of domicile of the ceding insurer. As such, it is possible that a ceding insurer will report reinsurance balances applicable to a single assuming insurer under multiple classifications within Schedule S. For example, with respect to a certified reinsurer that was considered unauthorized prior to certification, balances attributable to contracts entered into prior to the assuming insurer's certification would be reported in the unauthorized classification, while balances attributable to contracts entered into or renewed on or after the assuming insurer's certification would be reported in the certified classification. Proper classification of such balances is essential to ensure accurate reporting of collateral requirements applicable to specific balances and the corresponding calculation of the liability for unauthorized and/or certified reinsurance.

Index to Schedule F

Part 1	–	Assumed Reinsurance
Part 2	–	Ceded Reinsurance

ID Number

Schedule F requires that the "ID Number" be reported for assuming or ceding entities.

Reinsurance intermediaries should not be listed, because Schedule F is intended to identify only risk-bearing entities.

Use of Federal Employer Identification Number

The Federal Employer Identification Number (FEIN) must be reported for each U.S.-domiciled insurer and U.S. branch of an alien insurer. The FEIN should not be reported as the "ID Number" for other alien insurers even if the federal government has issued such a number.

Alien Insurer Identification Number (AIIN)

In order to report transactions involving alien companies correctly, the appropriate Alien Insurer Identification Number (AIIN) must be included on Schedule F instead of the FEIN. The AIIN number is assigned by the NAIC and is listed in the NAIC *Listing of Companies*. If an alien company does not appear in that publication, contact the NAIC Financial Systems and Services Department, Company Demographics Analyst at FDRCREQ@NAIC.ORG for numbers assigned since the last publication or for information on having a number assigned.

Newly assigned numbers are incorporated in revised editions of the NAIC *Listing of Companies*, which are available semi-annually. The NAIC also provides this information to annual statement software vendors for incorporation into the software.

Pools and Association Numbers

In order to report transactions involving non-risk bearing pools or associations consisting of non-affiliated companies correctly, the company must include on Schedule F the appropriate Pool/Association Identification Number. These numbers are listed in the NAIC *Listing of Companies*. The NAIC Pool/Association Identification Number should be used instead of any FEIN that may have been assigned. If a pool or association does not appear in that publication, contact the NAIC Financial Systems and Services Department, Company Demographics Analyst at FDRCCREQ@NAIC.ORG for numbers assigned since the last publication or for information on having a number assigned.

Newly assigned numbers are incorporated in revised editions of the NAIC *Listing of Companies*, which are available semi-annually. The NAIC also provides this information to annual statement software vendors for incorporation into the software.

Alien pools and associations should be reported on Schedule F under the category "Other Non-U.S. Insurers" rather than under "Pools, Associations and Similar Facilities." Pools and associations consisting of affiliated companies should be listed by individual company names rather than by pool or association identification.

Certified Reinsurer Identification Number (CRIN)

In order to report transactions involving certified reinsurers correctly, an appropriate Certified Reinsurer Identification Number (CRIN) must be included on Schedule F instead of the FEIN or Alien Insurer Identification Number (AIIN). The CRIN is assigned by the NAIC and is listed in the NAIC *Listing of Companies*. If a certified reinsurer does not appear in that publication, contact the NAIC Financial Systems and Services Department, Company Demographics Analyst at FDRCCREQ@NAIC.ORG for numbers assigned since the last publication or for information on having a number assigned.

Newly assigned numbers are incorporated in revised editions of the NAIC *Listing of Companies*, which are available semi-annually. The NAIC also provides this information to annual statement software vendors for incorporation into the software.

NAIC Company Code

Company codes are assigned by the NAIC and are listed in the NAIC *Listing of Companies*. The NAIC does not assign a company code to insurers domiciled outside of the U.S. or to non-risk bearing pools or associations. The "NAIC Company Code" field should be zero filled for those organizations. Non-risk bearing pools or associations are assigned a Pool/Association Identification Number. See the "Pool and Association Numbers" section above for details on assignment of Pool/Association Identification Numbers. Risk-bearing pools or associations are assigned a company code. If a reinsurer or reinsured has merged with another entity, report the company code of the surviving entity.

If a risk-bearing entity (e.g., risk-bearing pools or associations) does not appear in the NAIC *Listing of Companies*, contact the NAIC Financial Systems and Services Department, Company Demographics Analyst at FDRCCREQ@NAIC.ORG for numbers assigned since the last publication or for information on having a number assigned. Newly assigned company codes are incorporated in revised editions of the NAIC *Listing of Companies*, which are available semi-annually. The NAIC provides this information to annual statement software vendors for incorporation into the software.

Domiciliary Jurisdiction

In those parts of Schedule F requiring disclosure of the "Domiciliary Jurisdiction" for each domestic reinsurer or U.S. branch listed, the column should be completed with the state where the reinsurer maintains its statutory home office. For pools and associations enter the state where the administrative office of such pool or association is located. For alien reinsurers, this column should be completed with the country where the alien is domiciled. Enter the two-character U.S. postal code abbreviation for the domiciliary jurisdiction for U.S. states, territories and possessions. A comprehensive listing of three-character (ISO Alpha 3) abbreviations for foreign countries is available in the appendix of these instructions.

Lloyd's of London

The following procedure will apply as respects annual statement filings for 1995 and subsequent years:

Cessions to Lloyd's under reinsurance agreements having an inception date on or before July 31, 1995, and which are not amended or renewed thereafter should continue to be reported using the collective Lloyd's number, AA-1122000, on an aggregated basis, under "Authorized – Other Non-U.S. Insurers." As respects continuous reinsurance agreements, the anniversary date shall be deemed to be the renewal date of the agreement. Any revision of terms and conditions shall be deemed to be an amendment of the reinsurance agreement.

Cessions to Lloyd's under reinsurance agreements having an inception, amendment or renewal date on or after August 1, 1995, must be reported using the specific number of each subscribing syndicate, as listed in the alien section of the NAIC *Listing of Companies*. Such syndicates should be listed individually, under "Authorized – Other Non-U.S. Insurers."

Syndicates for which an identification number does not appear in the NAIC *Listing of Companies* must be treated as unauthorized as respects cessions under reinsurance agreements having an inception, amendment or renewal date on or after August 1, 1995, and should be reported, on an aggregated basis, under "Unauthorized – Other Non-U.S. Insurers," using a new collective number, AA-1123000.

Reinsurance assumed from syndicates at Lloyd's should continue to be reported on Schedule F, Part I using the original collective Lloyd's number, AA-1122000.

Dates

All dates reported in Schedule F must be in the format MM/DD/YYYY. For example, December 31, 2011, should be reported as 12/31/2011.

Determination of Authorized Status

The determination of the authorized, unauthorized, or certified status of an insurer or reinsurer listed in any part of Schedule F shall be based on the status of that insurer or reinsurer in the reporting company's state of domicile.

U.S. Intercompany Pooling Arrangements

Participation in intercompany pooling arrangements, whereby assumed business written by any company participating in the pool is ceded first to the lead company and then redistributed among pool members, shall be reflected under the appropriate categories in Schedule F (e.g. cessions from participating affiliates to the lead company for that company, and in the ceded schedule for the affiliates). Subsequent redistribution of the pooled business from the lead company to participating affiliates shall be reported in similar fashion (e.g. cessions to the affiliates in the ceded schedule for the lead company, and as an assumption from the lead company for each of the affiliates participating in the pool).

Cessions to unaffiliated reinsurers, whether prior to cession of the pooled business to the lead company or subsequent thereto, shall be reported in the usual manner in the ceded schedules for the company or companies effecting such cessions, or identified as parties to the reinsurance agreement under which such cessions are effected, as appropriate (e.g., both the initial cessions to the lead company and the subsequent cessions of pooled business from the lead company to the participating affiliates shall reflect any applicable cessions to unaffiliated reinsurers).

Alien Reinsurers Maintaining Beneficiary U.S. Trust Accounts

Certain alien reinsurers have established multiple beneficiary trust accounts for the purpose of collateralizing obligations arising in connection with reinsurance assumed from U.S. ceding entities, and have been granted authorized reinsurer status in a number of states. Ceding entities domiciled in a state that has granted such status to an alien reinsurer should report cessions to such reinsurer, using the appropriate Alien Insurer Identification Number under “Authorized – Non-U.S. Insurers” to the extent that obligations attributable to such cessions have been collateralized via the alien reinsurer’s multiple beneficiary U.S. trust account.

Amounts recoverable from such alien reinsurers that have not been collateralized via a multiple beneficiary U.S. trust account should continue to be reported under “Unauthorized – Other Non-U.S. Insurers.”

Captive Affiliate Line Category

For the purpose of reporting a reinsurer as captive affiliate on Schedule F, the captive affiliate line categories shall include affiliated non-traditional insurers/reinsurers.

Definition of Affiliated Non-Traditional Insurer/Reinsurer

This disclosure is intended to capture cessions to affiliated insurance/reinsurance entities that are subject to a financial solvency regulatory system separate from that generally applicable to traditional insurers and/or reinsurers in the ceding entity’s domestic jurisdiction. The definition of “Affiliate” is established in the NAIC Model Holding Company Act. An affiliated non-traditional insurer/reinsurer is an insurance or reinsurance company that reinsures risks only from its parent or affiliates and is subject to a financial solvency regulatory system separate from that generally applicable to traditional insurers and/or reinsurers in the ceding entity’s domestic jurisdiction. For the purpose of annual statement reporting, this definition shall be presumed to include the following, subject to the cedant’s rebuttal to its domicile:

1. An affiliated insurance or reinsurance company licensed, authorized or otherwise granted the authority to operate in a single United States jurisdiction under any captive insurer law, special purpose insurer law, or other similar law separate from those applicable to traditional insurers and/or reinsurers.
2. An affiliated insurance or reinsurance company licensed, authorized or otherwise granted the authority to operate in any jurisdiction outside the United States under any captive insurer law, special purpose insurer law, or other similar law separate from those applicable to traditional insurers and/or reinsurers in that non-United States jurisdiction.
3. Any other affiliated insurance or reinsurance company that by law, regulation, or order, or contract is authorized to insure or reinsure only risks from its parent or affiliate.

SCHEDULE F – PART 1

ASSUMED REINSURANCE

If a reporting entity has any detail lines reported for any of the following required groups, categories, or subcategories, it shall report the subtotal of the corresponding group, category, or subcategory, with the specified subtotal line appearing in the same manner and location as the pre-printed total or grand total line and number.

<u>Group or Category</u>	<u>Line Number</u>
Total Affiliates	
U.S. Intercompany Pooling	0199999
U.S. Non-Pool	
Captive	0299999
Other	0399999
Total	0499999
Other (Non-U.S.)	
Captive	0599999
Other	0699999
Total	0799999
Total Affiliates	0899999
Total Other U.S. Unaffiliated Insurers #	0999999
Pools and Associations	
Mandatory Pools, Associations or Other Similar Facilities	1099999
Voluntary Pools, Associations or Other Similar Facilities	1199999
Total Pools and Associations	1299999
Total Other Non-U.S. Insurers	1399999
Totals	9999999

Unaffiliated U.S. branches of alien insurers should be included with "Total Other U.S. Unaffiliated Insurers."

Reinsurance assumed from pools or associations may be reported in the name of the pool or association instead of in the names of the insurers that ceded the reinsurance to the pool or association.

Column 1 – Identification Number

Enter one of the following as appropriate for the entity being reported on the schedule. See the Schedule F General Instructions for more information on these identification numbers.

- Federal Employer Identification Number (FEIN)
- Alien Insurer Identification Number (AIIN)
- Certified Reinsurer Identification Number (CRIN)
- Pool/Association Identification Number

Column 6 – Reinsurance on Paid Losses and Loss Adjustment Expenses

Report loss adjustment expenses due and payable to the reinsured.

- Column 7 – Known Case Losses and LAE
- Known case reserves, obtained from Underwriting and Investment Exhibit, Part 4, Column 1, must be combined with assumed LAE. There is no direct tie-in to Underwriting and Investment Exhibit, Part 4 or Schedule P.
- Column 8 – Totals of Columns 6 + 7 for each category.
- Column 9 – Contingent Commissions Payable
- Profit commissions generated from assumed reinsurance contracts due the reinsured. Report commissions net of return profit commissions. Negative commissions are possible, i.e., when a contingent commission is receivable.
- Column 10 – Assumed Premiums Receivable
- Amounts reported should be net of commissions payable.

Not for Distribution

SCHEDULE F – PART 2

CEDED REINSURANCE

If a reporting entity has amounts reported for any of the following required groups, categories, or subcategories, it shall report the subtotal amount of the corresponding group, categories, or subcategory, with the specified subtotal line number appearing in the same manner and location as the pre-printed total line and number.

<u>Group or Category</u>	<u>Line Number</u>
Total Authorized	
Affiliates	
Affiliates – U.S. Intercompany Pooling	0199999
U.S. Non-Pool	
Captive.....	0299999
Other	0399999
Total.....	0499999
Other (Non-U.S.)	
Captive.....	0599999
Other	0699999
Total.....	0799999
Total Authorized – Affiliates	0899999
Other U.S. Unaffiliated Insurers.....	0999999
Pools	
Mandatory Pools*	1099999
Voluntary Pools*.....	1199999
Other Non-U.S. Insurers#.....	1299999
Protected Cells.....	1399999
Total Authorized Excluding Protected Cells (Sum of 0899999, 0999999, 1099999, 1199999 and 1299999)	1499999
Total Unauthorized	
Affiliates	
U.S. Intercompany Pooling.....	1599999
U.S. Non-Pool	
Captive.....	1699999
Other	1799999
Total.....	1899999
Other (Non-U.S.)	
Captive.....	1999999
Other	2099999
Total.....	2199999
Total Unauthorized – Affiliates	2299999
Other U.S. Unaffiliated Insurers.....	2399999
Pools	
Mandatory Pools*	2499999
Voluntary Pools*.....	2599999
Other Non-U.S. Insurers#.....	2699999
Protected Cells.....	2799999
Total Unauthorized Excluding Protected Cells (Sum of 2299999, 2399999, 2499999, 2599999 and 2699999)	2899999

Total Certified

Affiliates

U.S. Intercompany Pooling.....	2999999
U.S. Non-Pool	
Captive.....	3099999
Other.....	3199999
Total.....	3299999
Other (Non-U.S.)	
Captive.....	3399999
Other.....	3499999
Total.....	3599999
Total Certified – Affiliates.....	3699999

Other U.S. Unaffiliated Insurers..... 3799999

Pools

Mandatory Pools*@.....	3899999
Voluntary Pools*%.....	3999999
Other Non-U.S. Insurers#.....	4099999
Protected Cells.....	4199999
Total Certified Excluding Protected Cells (Sum of 3699999, 3799999, 3899999, 3999999 and 4099999).....	4299999

Total Authorized, Unauthorized and Certified Excluding Protected Cells (Sum of 1999999, 2899999 and 4299999)..... 4399999

Total Protected Cells (Sum of 1399999, 2799999 and 4199999)..... 4499999

Totals (Sum of 4399999 and 4499999)..... 9999999

* Pools and Associations consisting of affiliated companies should be listed by individual company names.

Alien Pools and Associations should be reported on Schedule F under the category "Other Non-U.S. Insurers."

Column 1 – ID Number

Enter one of the following as appropriate for the entity being reported on the schedule. See the Schedule F General Instructions for more information on these identification numbers.

- Federal Employer Identification Number (FEIN)
- Alien Insurer Identification Number (AIIN)
- Certified Reinsurer Identification Number (CRIN)
- Pool/Association Identification Number

Column 4 – Domiciliary Jurisdiction

Report the two-character U.S. postal code abbreviation for the domiciliary jurisdiction for U.S. states, territories and possessions. A comprehensive listing of three-character (ISO Alpha 3) abbreviations for foreign countries is available in the appendix of these instructions.

If a reinsurer has merged with another entity, report the domiciliary jurisdiction of the surviving entity.

For pools and associations, enter the state where the administrative office of such pool or association is located.

Column 5 – Special Code

Special Code "2" – Reinsurance Contracts Ceding 75% or More Direct Premiums Written

Each individual contract, except those listed below, that provides for the cession of 75% or more of direct premiums written under such cession during the year should be identified by inserting a 2 in this column. The reinsurance transactions so identified shall include both treaty and facultative cessions of direct business written by the company.

Exclude: Intercompany reinsurance transactions with affiliates.

Reinsurance transactions involving any group, association, pool or organization of insurers that engage in joint underwriting activities and which are subject to examinations by any state regulatory authority or which operate pursuant to any state or federal statutory or administrative authorization.

Any reinsurance transaction in which the annual gross premium ceded is less than 5% of policyholder surplus.

Reinsurance transactions involving captive insurance companies.

Column 6 – Reinsurance Premiums Ceded

Total multiplied by 1000 should equal Underwriting and Investment Exhibit, Part 2, Column 3 plus Column 4.

Column 9 – Known Case Loss Reserves

Total multiplied by 1000 should agree with Underwriting and Investment Exhibit, Part 4, Column 2.

Column 10 – Known Case LAE Reserves

Exclude: Adjusting and other Expense reserves.

Column 11 – IBNR Loss Reserves

Total multiplied by 1000 should agree with Underwriting and Investment Exhibit, Part 4, Column 5.

Column 14 – Contingent Commission

Include: Contingent commissions receivable from a reinsurer. Regular commissions should be netted with ceded balances payable in Column 16.

Column 17 – Other Amounts Due to Reinsurers

Both Column 16 and Column 17 are liabilities owed to the reinsurer.

Exclude: Funds held by the company under reinsurance treaties, which are included in Column 19.

Items entered in Column 17 may represent miscellaneous balances owed by the reinsured to the reinsurer on ceded transactions.

Column 18 – Net Amount Recoverable from Reinsurers

Offsets should be included to the extent allowable or appropriate.

SCHEDULE P

There are six parts within Schedule P, Part 1 provides detailed information on losses and loss expenses. Part 2 provides a history of incurred losses and defense & cost containment expenses. Part 3 provides a history of loss and defense & cost containment payments. Part 4 provides a history of bulk and incurred but not reported (IBNR) reserves. Part 5 provides a history of claims. Part 6 provides a history of premiums earned.

Schedule P is intended to display a summary containing ten years of historical data for all lines of business. The casualty lines of business will display ten years of historical data in their respective sections of Schedule P.

In those instances where a reporting entity files an amended annual statement as a result of a restatement of prior year earned premium, losses or loss adjustment expenses, Schedule P must be restated and included in the amended annual statement.

Schedule P includes only the data for the reporting entity identified on the Jurat page of the Annual Statement.

Earned premium is on a calendar-year basis. Losses incurred should be assigned to the year in which the event occurred that triggered coverage under the contract. This may be a date of accident (occurrence policies), a date of report (claims-made policies), or a policy issue date (tail policies).

Retroactive reinsurance should not be reflected in Schedule P. The transferor in such an agreement must record, without recognition of the retroactive reinsurance, its loss and loss adjustment expense reserves on a gross basis on its balance sheet and in all schedules and exhibits. The transferee in such an agreement must exclude the retroactive reinsurance from its loss and loss expense reserves and from its schedules and exhibits.

A discount implicit in tabular reserves may be included in Schedule P, Part 1. Schedule P, Part 2 is to be reported gross of ALL discounts. Otherwise, Schedule P is to be presented on a net discounted basis. Information in Schedule P is to be reported on an undiscounted basis in order to make effective use of the triangles in Parts 2, 3 and 4. The reserves reported are expected to represent the ultimate amounts to be paid, including anticipated inflation. Also, work papers relating to any discount amounts must be available for examination upon request. The tabular reserve discount does not need to be shown separately. Discounting (including the discount in tabular reserves) is allowed only if expressly permitted by the state insurance department to which this Annual Supplement is being filed.

The reserves for unpaid losses and loss adjustment expenses should take into account the explicit or implicit impacts of the various factors affecting claim frequency or ultimate claim cost.

For guidelines on completing Schedule P, see examples immediately following the instructions for Schedule P, Part 6.

NOTE: Report all dollar amounts in Schedule P in thousands of dollars (\$000 omitted), by either rounding or truncating.

SCHEDULE P – PART 1

Part 1 is the total of the workers compensation carve-out line.

The columnar headings provide instructions necessary for completion.

"Number of Claims Reported Assumed," Column 12, should include the cumulative number of claims reported through the annual statement. "Number of Claims Outstanding Assumed," Column 25, must be reported.

Cumulative subrogation received and losses and expenses paid should be reported for each specific year. For "prior," report only subrogation received and losses and expenses paid in current year.

In Schedule P, Part 1, subrogation received should be reported net of reinsurance, if any. Loss payments are to be reported net of subrogation received.

Premiums earned and losses paid, unpaid, and incurred should reconcile with the Underwriting and Investment Exhibit. The work papers that show a reconciliation explaining reinsurance, discounting and subrogation adjustment should be available for examination upon request.

"Assumed" means reinsurance assumed, including from affiliated pooling agreements.

"Ceded" means reinsurance ceded on business so reported direct or assumed.

Report cumulative amounts paid or received for specific years.

The loss adjustment expenses used to be divided in Schedule P in "allocated" and "unallocated," which were terms that were never clearly defined. Effective January 1, 1998, a detailed definition of these expenses was adopted. The distinction is now between "Defense & Cost Containment" and "Adjusting & Other." The loss adjustment expenses are separated with the intent of identifying the "Defense & Cost Containment" expenses as those, which are correlated with the loss amounts, and the "Adjusting & Other" as those expenses, which are correlated with claim, count or are general loss adjusting expenses. In projecting the necessary reserves for these expenses, actuaries use a different approach for each of the two types of expenses. It is the character of the expenses that is most important, not whether the expenses were internal or external to the reporting entity.

"Defense & Cost Containment" expenses include defense, litigation and cost containment expenses, whether internal or external. "Defense" means defense by the reporting entity in a contentious situation, whether a first party claim. The fees charged for reporting entity employees should include overhead, just as an outside firm's charges would include. The expenses exclude expenses incurred in the determination of coverage. These expenses include the following items:

1. Surveillance expenses;
2. Fixed amounts for cost containment expenses;
3. Litigation management expenses;
4. Loss adjustment expenses for participation in voluntary and involuntary market pools if reported by accident year;
5. Fees or salaries for appraisers, private investigators, hearing representatives, reinspectors and fraud investigators, if working in defense of a claim, and fees or salaries for rehabilitation nurses, if such cost is not included in losses;
6. Attorney fees incurred owing to a duty to defend, even when other coverage does not exist; and
7. The cost of engaging experts.

"Adjusting & Other" Expenses are those expenses other than those above and which have been assigned to the "Loss Adjustment Expense" group in the Underwriting and Investment Exhibit, Part 4, Expenses. These expenses include the following items:

1. Fees of adjusters and settling agents (but not if engaged in a contentious defense);
2. Loss adjustment expenses for participation in voluntary and involuntary market pools if reported by calendar year;
3. Attorney fees incurred in the determination of coverage, including litigation between the reporting entity and the policyholder; and
4. Fees and salaries for appraisers, private investigators, hearing representatives, reinspectors and fraud investigators, if working in the capacity of an adjuster.

The foregoing list is not intended to be all-inclusive. We are relying on the reporting entities to use reasonable judgment in particular situations.

The "Defense & Cost Containment" expenses should be assigned to the accident year in which the associated losses were assigned. The "Adjusting & Other" expenses can be assigned in any justifiable way among the accident years. The preferred way is to apportion these expenses in proportion to the number of claims reported, closed, or outstanding each year.

Please Note: This instruction is intended solely to give guidance on reporting loss adjustment expenses in Schedule P in the annual supplement. It is not intended to provide guidance on the types of expenses to include in loss adjustment expenses. These definitions of Defense & Cost Containment expense and Adjusting and Other expense are not intended to affect insurance or reinsurance agreements or other contractual agreements.

Column 24 is equal to Column 13 – Column 14 + Column 15 – Column 16 + Column 17 – Column 18 + Column 19 – Column 20 + Column 21 – Column 22.

Column 28, "Net," equals Column 26 – Column 27, which equals Column 11 + Column 24.

Column 32 and 33 require reporting of the discount, if any, included on any line in Page 3 on liabilities for unpaid losses and expenses, in regard to non-tabular losses and expenses. Columns 35 and 36 are the Column 24 unpaid losses and expenses net of the discount in Columns 32 and 33. Columns 35 and 36 must be completed and should agree with net balance sheet reserves after discount. If the reporting entity reports on a pooling basis, then the percentage of that pool reported herein should be entered in Column 34. If some of the business is pooled and some is not, leave Column 34 blank.

Report in Column 23 the estimated amount of anticipated subrogation that has been taken as credit (netted) in the reserves for unpaid losses and loss adjustment expenses reported in Column 24. (Note: Column 23 is a memo column only as the amounts contained therein have already been taken into consideration in Columns 13 through 20).

SCHEDULE P – PARTS 2, 3 AND 4

All amounts in Schedule P, Parts 2, 3 and 4 are reported net of reinsurance.

Schedule P, Part 2 provides a loss and expense development overview to test the adequacy of the reporting entity's reserves. Schedule P, Part 3 shows the payment patterns for cash flow projections, discounting calculations, and actuarial projections. Schedule P, Part 4 is an exhibit showing the historical bulk and IBNR reserves as reported. Part 4 does not show a development of these reserves, and it will not, by itself, provide a test of the adequacy of these reserves.

Schedule P, Parts 2, 3 and 4 have parallel formats and are the basic exhibits for actuarial and financial analyses. The same Line Titles that applied to Schedule P, Part 1 also apply to Parts 2, 3 and 4.

All amounts are to be reported net of subrogation paid and anticipated.

All amounts in Parts 2 and 4 must be reported gross of both tabular and non-tabular discounting.

In Part 2, the "Development" in Column 11 and 12 should be the current year less the first or second prior year, showing the (redundant) or adverse development.

Report all amounts in thousands of dollars (\$000 omitted), by either rounding or truncating.

Loss Adjustment Expenses:

The triangles include only the "Defense & Cost Containment" loss adjustment expenses. The old Schedule P, Parts 2, 3 and 4 contained only the previously termed "allocated" loss adjustment expenses. Now the term "Defense & Cost Containment" is used. As before, the reason for this is that "Defense & Cost Containment" adjustment expenses correlate with loss amounts, but the "Adjusting & Other" adjusting expenses do not.

Bulk and IBNR Reserves:

The Bulk and IBNR reserves for losses and expenses are intended to include reserves for incurred but not reported claims, for reopened claims, for development on case reserves of reported claims, and for aggregate reserves on newly reported claims without specific case reserves. The Bulk and IBNR reserves are the actuarially determined reserves and are included in the losses unpaid and loss expenses unpaid reported in Schedule P, Parts 1 and 2.

These reserves include provision for "defense and cost containment" expenses, unlike the reserves reported in the Underwriting and Investment Exhibit, Part 3.

The Prior Line:

In Part 2, Line 1, Column 1, include the loss and expense reserves (case + bulk + IBNR) previously reported at year-end of the last year for all accident years prior to the last year. The subsequent development each year across Line 1 will relate to these reserves and will show the subsequent payments and outstanding reserves.

In Part 3, Line 1, Column 1, the amount entered should always be "zero." In Line 1, Column 2, the amount should be the loss and expense payments made in that year on the reserves reported in Part 2, Line 1, Column 1. (These payments should also have been included in Part 2, Line 1, Column 2.) In Line 1, Column 3, the amount should be the loss and expense payments made in that year and the preceding year on the reserves reported in Part 2, Line 1, Column 2. (These payments should also have been included in Part 2, Line 1, Column 3.) Columns 4 through 10 should continue to cumulate the payments in the same way and tie into the Part 2 "prior" line.

In Part 4, Line 1, Column 1, the amount entered should be the bulk and IBNR that was included in Part 2, Line 1, Column 1, (which should equal the case reserves plus the bulk and IBNR). In fact, the entire Line 1 should be the bulk and IBNR included in Part 2, Line 1.

The "prior" line can be reconciled with the immediately preceding year's annual statement by breaking down the accident years in the preceding annual statement and properly summing the parts.

SCHEDULE P – PART 5

Part 5 is a reporting of claim count information in one location, all of which should have been reported in the current or prior Annual Statements. Section 1 shows the number of claims closed with loss payment, as previously reported in Part 3, Column 12. Section 2 shows the number of claims outstanding, as previously reported in Part 1, Column 26, for all years, since this information has always been required in Schedule P. Section 3 shows the number of claims reported, as previously reported in Part 1, Column 13.

All claim count information reported in Schedule P should be on a “direct and assumed” basis, and should reconcile. “Direct and assumed” means direct plus the proportion of a pool plus proportional reinsurance assumed. The same percentage used for dollar amounts should also be used for the claim counts.

SCHEDULE P – PART 6

For Schedule P, Part 6, the premiums to be reported are exposure or coverage year earned premium, recalculated each subsequent year to reflect audits retrospective adjustments based on loss experience, accounting lag, etc. Mechanically, the written premium file would be restated and the earned premium calculation repeated each year. Premium adjustments for policy periods that cover more than one calendar year should be proportionately distributed between the calendar years covered by the policy period. The objective is to develop earned premiums by calendar year of coverage consistent with the loss and Defense & Cost Containment expense by accident year.

A further objective is to determine a more accurate loss and Defense & Cost Containment expense ratio and to be able to project the earned but unbilled premiums, which may be an asset or liability. The reporting entity may use any method to recalculate the premiums, which will achieve this objective.

Example 1 in Exhibit B demonstrates how the sections would look if all years were retroactively determined and reported. Column 11 is for informational purposes and shows the distribution of premiums earned during the current year for the prior years. Premiums as reported in Schedule P, Part 1, Columns 1 and 2, are also shown at the bottom of the exhibit to demonstrate the relationship and to show how Part 6 reconciles with Part 1.

The Prior Line should show the earned premium adjustment for each respective year for prior years. For prior experience years (columns), Line 1 for a particular year of experience (x) can be determined from the prior year’s Schedule P, Part 6, as the sum of Lines 1 plus 2 for experience year (x) (column) minus Line 2 for the preceding year (x – 1).

Example 2 in Exhibit b shows the minimum reporting requirement, which are accident years 1997 and subsequent plus total current year earned premiums by accident year.

The same features are applicable for Section 2 on ceded business.

Schedule P – Part 2 – Incurred Net Losses and Defense and Cost Containment Report at Year-End

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Prior	Case+ Bulk + IBNR rsvs on <2010 @ Ye 2010	paid in 2011 + rsvs on < 2010 @ ye 2011	paid 2011 thru 2012 + rsvs on < 2010 @ ye 2012	paid 2011 thru 2013 + rsvs on < 2010 @ ye 2013	paid 2011 thru 2014 + rsvs on < 2010 @ ye 2014	paid 2011 thru 2015 + rsvs on < 2010 @ ye 2015	paid 2011 thru 2016 + rsvs on < 2010 @ ye 2016	paid 2011 thru 2017 + rsvs on < 2010 @ ye 2017	paid 2011 thru 2018 + rsvs on < 2010 @ ye 2018	paid 2011 thru 2019 + rsvs on < 2010 @ ye 2019
2010	paid in 2010 rsvs on 2010@ ye 2010	paid thru 2011+rsvs on 2010@ ye 2011	paid thru 2012+rsvs on 2010@ ye 2012	paid thru 2013+rsvs on 2010@ ye 2013	paid thru 2014+rsvs on 2010@ ye 2014	paid thru 2015+rsvs on 2010@ ye 2015	paid thru 2016+rsvs on 2010@ ye 2016	paid thru 2017+rsvs on 2010@ ye 2017	paid thru 2018+rsvs on 2010@ ye 2018	paid thru 2019+rsvs on 2010@ ye 2019
2011		paid in 2011+rsvs on 2011@ ye 2011	paid thru 2012+rsvs on 2011@ ye 2012	paid thru 2013+rsvs on 2011@ ye 2013	paid thru 2014+rsvs on 2011@ ye 2014	paid thru 2015+rsvs on 2011@ ye 2015	paid thru 2016+rsvs on 2011@ ye 2016	paid thru 2017+rsvs on 2011@ ye 2017	paid thru 2018+rsvs on 2011@ ye 2018	paid thru 2019+rsvs on 2011@ ye 2019
2012			paid in 2012+rsvs on 2012@ ye 2012	paid thru 2013+rsvs on 2012@ ye 2013	paid thru 2014+rsvs on 2012@ ye 2014	paid thru 2015+rsvs on 2012@ ye 2015	paid thru 2016+rsvs on 2012@ ye 2016	paid thru 2017+rsvs on 2012@ ye 2017	paid thru 2018+rsvs on 2012@ ye 2018	paid thru 2019+rsvs on 2012@ ye 2019
2013				paid in 2013+rsvs on 2013@ ye 2013	paid thru 2014+rsvs on 2013@ ye 2014	paid thru 2015+rsvs on 2013@ ye 2015	paid thru 2016+rsvs on 2013@ ye 2016	paid thru 2017+rsvs on 2013@ ye 2017	paid thru 2018+rsvs on 2013@ ye 2018	paid thru 2019+rsvs on 2013@ ye 2019
2014					paid in 2014+rsvs on 2014@ ye 2014	paid thru 2015+rsvs on 2014@ ye 2015	paid thru 2016+rsvs on 2014@ ye 2016	paid thru 2017+rsvs on 2014@ ye 2017	paid thru 2018+rsvs on 2014@ ye 2018	paid thru 2019+rsvs on 2014@ ye 2019
2015						paid in 2015+rsvs on 2015@ ye 2015	paid thru 2016+rsvs on 2015@ ye 2016	paid thru 2017+rsvs on 2015@ ye 2017	paid thru 2018+rsvs on 2015@ ye 2018	paid thru 2019+rsvs on 2015@ ye 2019
2016							paid in 2016+rsvs on 2016@ ye 2016	paid thru 2017+rsvs on 2016@ ye 2017	paid thru 2018+rsvs on 2016@ ye 2018	paid thru 2019+rsvs on 2016@ ye 2019
2017								paid in 2017+rsvs on 2017@ ye 2017	paid thru 2018+rsv on 2017@ ye 2018	paid thru 2019+rsvs on 2017@ ye 2019
2018									paid in 2018+rsvs on 2018@ ye 2018	paid thru 2019+rsvs on 2018@ ye 2019
2019										paid in 2019+rsvs on 2019@ ye 2019

NOTE: Figures are net of reinsurance, subrogation.

Reserve Only. Subsequent development relates only to subsequent payments and reserves.
 From Part 1: Column 11 - (Column 8 - Column 9) + Column 24 - (Column 21 - Column 22)

Schedule P – Part 3 – Cumulative Paid Net Losses and Defense and Cost Containment Expenses Reported at Year-End

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Number of Claims Closed With Loss Payment	Number of Claims Closed Without Loss Payment
Prior		paid in 2011 on < 2010	paid thru 2011 on < 2010	paid thru 2011 on < 2010	paid thru 2011 on < 2010	paid thru 2011 on < 2010	paid thru 2011 on < 2010	paid thru 2011 on < 2010	paid thru 2011 on < 2010	paid thru 2011 on < 2010		
2010	paid in 2010 on 2010	paid thru 2011 on 2010	paid thru 2012 on 2010	paid thru 2013 on 2010	paid thru 2014 on 2010	paid thru 2015 on 2010	paid thru 2016 on 2010	paid thru 2017 on 2010	paid thru 2018 on 2010	paid thru 2019 on 2010		
2011		paid in 2011 on 2011	paid thru 2012 on 2011	paid thru 2013 on 2011	paid thru 2014 on 2011	paid thru 2015 on 2011	paid thru 2016 on 2011	paid thru 2017 on 2011	paid thru 2018 on 2011	paid thru 2019 on 2011		
2012			paid in 2012 on 2012	paid thru 2013 on 2012	paid thru 2014 on 2012	paid thru 2015 on 2012	paid thru 2016 on 2012	paid thru 2017 on 2012	paid thru 2018 on 2012	paid thru 2019 on 2012		
2013				paid in 2013 on 2013	paid thru 2014 on 2013	paid thru 2015 on 2013	paid thru 2016 on 2013	paid thru 2017 on 2013	paid thru 2018 on 2013	paid thru 2019 on 2013		
2014					paid in 2014 on 2014	paid thru 2015 on 2014	paid thru 2016 on 2014	paid thru 2017 on 2014	paid thru 2018 on 2014	paid thru 2019 on 2014		
2015						paid in 2015 on 2015	paid thru 2016 on 2015	paid thru 2017 on 2015	paid thru 2018 on 2015	paid thru 2019 on 2015		
2016							paid in 2016 on 2016	paid thru 2017 on 2016	paid thru 2018 on 2016	paid thru 2019 on 2016		
2017								paid in 2017 on 2017	paid thru 2018 on 2017	paid thru 2019 on 2017		
2018									paid in 2018 on 2018	paid thru 2019 on 2018		
2019										paid in 2019 on 2019		

Notes: Figures are net of reinsurance.
 Figures are net of subrogation received.

From Part 1: Column 4 + Column 5 + Column 6 - Column 7
 (or Column 11 - (Column 8 - Column 9))

Schedule P – Part 6 – Earned Premium Development

Example 1

Year in Which Premiums Were Earned and Losses Were Incurred	CUMULATIVE PREMIUMS EARNED DIRECT AND ASSUMED AT YEAR END (\$'000 OMITTED)											
	1	2	3	4	5	6	7	8	9	10	11	
1. Prior	10,000	6,000	4,000	3,000	2,200	1,500	1,000	600	300	100	100	Current Year Premiums Earned
2. 2010	350,000	354,000	356,000	357,000	357,800	358,200	359,000	359,400	359,700	359,900	200	
3. 2011	XXXX	355,000	359,000	361,000	362,000	362,800	363,500	364,000	364,400	364,700	300	
4. 2012		XXXX	360,000	364,000	366,000	367,000	367,800	368,500	369,000	369,400	400	
5. 2013			XXXX	365,000	369,000	371,000	372,000	372,800	373,500	374,000	500	
6. 2014				XXXX	370,000	374,000	376,000	377,000	377,800	378,500	700	
7. 2015					XXXX	375,000	379,000	381,000	382,000	382,800	800	
8. 2016						XXXX	380,000	384,000	386,000	387,000	1,000	
9. 2017							XXXX	385,000	389,000	391,000	2,000	
10. 2018								XXXX	390,000	394,000	4,000	
11. 2019									XXXX	395,000	395,000	
12. Total										XXXX	405,000	
Sch. P – Part 1 EP	360,000	365,000	370,000	375,000	380,000	385,000	390,000	395,000	400,000	405,000	XXXX	

Schedule P – Part 6 – Earned Premium Development

Example 2

Year in Which Premiums Were Earned and Losses Were Incurred	CUMULATIVE PREMIUMS EARNED DIRECT AND ASSUMED AT YEAR END (\$000 OMITTED)										
	1	2	3	4	5	6	7	8	9	10	11
1. Prior	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	
2. 2010											
3. 2011	XXXX										
4. 2012		XXXX									
5. 2013			XXXX								
6. 2014				XXXX	370,000	374,000	376,000	377,000	377,800	378,500	
7. 2015					XXXX	379,000	379,000	381,000	382,000	382,800	
8. 2016						XXXX	380,000	384,000	386,000	387,000	1,000
9. 2017							XXXX	385,000	389,000	391,000	2,000
10. 2018								XXXX	390,000	394,000	4,000
11. 2019									XXXX	395,000	395,000
12. Total										XXXX	405,000
Sch. P – Part 1 EP	360,000	365,000	370,000	375,000	380,000	385,000	390,000	395,000	400,000	405,000	XXXX

SUPPLEMENTAL SCHEDULE O – PARTS 1 THROUGH 4

DEVELOPMENT OF INCURRED LOSSES

The purpose of this schedule is to test the adequacy of reserves held on various types of accident and health insurance. The schedule allows for the development of a five-year trend of losses incurred by a specific year group of claimants.

Schedule O, each part must be filled out for the Group Accident and Health, Credit Accident and Health, and Other Accident and Health lines for all companies which have those businesses. All accident and health business other than group and credit are meant to be included in "Other Accident and Health" lines. Examples of this type of business could include, among others, the waiver of premium benefit for life insurance or credit involuntary unemployment insurance. Those companies that use similar data to calculate claim reserves and liabilities for lines of business other than accident and health must include a similar exhibit for those lines. Report all dollar amounts in thousands (\$000 omitted).

SUPPLEMENTAL SCHEDULE O – PART 1

CUMULATIVE NET AMOUNTS PAID POLICYHOLDERS

Show cumulative paid claims by year paid and year incurred. Claims incurred in the year shown on Line 2 should be included in the appropriate column on Line 1.

	2015	2016	2017	2018	2019
Prior	paid in 2015 on <2015	paid 2015 thru 2016 on <2015	paid 2015 thru 2017 on <2015	paid 2015 thru 2018 on <2015	paid 2015 thru 2019 on <2015
2015	paid in 2015 on 2015	paid thru 2016 on 2015	paid thru 2017 on 2015	paid thru 2018 on 2015	paid thru 2019 on 2015
2016		paid in 2016 on 2016	paid thru 2017 on 2016	paid thru 2018 on 2016	paid thru 2019 on 2016
2017			paid in 2017 on 2017	paid thru 2018 on 2017	paid thru 2019 on 2017
2018				paid in 2018 on 2018	paid thru 2019 on 2018
2019					paid in 2019 on 2019

SUPPLEMENTAL SCHEDULE O – PART 3

SUM OF NET CUMULATIVE AMOUNT PAID POLICYHOLDERS AND CLAIM LIABILITY AND RESERVE OUTSTANDING AT END OF YEAR

Schedule O, Part 3 provides a claim cost development overview to show the adequacy of claim reserves for a particular incurral year at the end of that year and at the end of subsequent years. The entry in line X and column Y is the cumulative claims incurred during year X and paid through the end of year Y for claims incurred in year X, plus the reserve at the end of year Y for claims incurred in year X.

SUPPLEMENTAL SCHEDULE O – PART 5

RESERVE AND LIABILITY METHODOLOGY

Show the claim reserve and liability for each line of business. Indicate the methodology by which those items are calculated. For this purpose, the methodology can be either "Development," "Standard Factor," or "Other." All coverages using the Development Method must be shown in a separate table in Schedule O – Parts 1 through 4. Report all dollar amounts in thousands (\$000 omitted).

Column 1 – Methodology

Indicate for which lines of business actual claim run-out date is used in setting reserves. For those lines of business, Parts 1 through 4 of Schedule O must be completed. For other lines of business, Parts 1 through 4 are not needed.

Column 2 – Amount

Should equal the sum of Exhibit 6 (Claim Reserve), Line 16, Column 1, and Exhibit 8, Part 1, Total net of reinsurance, Line 4.4.

Not for Distribution

Line 1 – Premiums Collected

Line 1.11 – Standard Coverage with Reinsurance Coverage

Report the Beneficiary Premium (Standard Coverage Portion), Low-Income Subsidy (Premium Portion) and Direct Subsidy amounts received for PDPs that are subject to Reinsurance Coverage. These amounts represent the premium as approved by CMS (including the effect of the “health status risk adjustments”) for the Part D coverages that qualify as Standard Coverage. Note that the actual coverage does not have to be identical to the “standard coverage” as defined by the MMA, but may instead be coverage approved as actuarially equivalent by CMS.

Line 1.12 – Standard Coverage without Reinsurance Coverage

Report the Beneficiary Premium (Standard Coverage Portion), Low-Income Subsidy (Premium Portion), Direct Subsidy and Part D Payment Demonstration amounts received for PDPs that are not subject to Reinsurance Coverage. These amounts represent the premium as approved by CMS (including the effect of the “health status risk adjustments”) for the Part D coverages that qualify as Standard Coverage. Note that the actual coverage does not have to be identical to the “standard coverage” as defined by the MMA, but may instead be coverage approved as actuarially equivalent by CMS.

Line 1.13 – Standard Coverage, Risk Corridor Payment Adjustments

Report any amounts paid to or received from CMS as Risk Corridor Payment Adjustments (based on where actual loss experience falls within the various MMA-defined risk corridors). Amounts paid to CMS should be reported as negative amounts; amounts received from CMS should be reported as positive amounts.

Line 1.2 – Supplemental Benefits

Report all other premiums received for Part D coverage. These will be the additional premiums that the PDP requires participants to pay for Supplemental Benefits.

Line 2 – Premiums Due and Uncollected – Change

Exclude any receivable or payable for Risk Corridor Payment Adjustments, which should be reported on Lines 4.1 and 4.2. Note that, per the reference in INT 05-05 to SSAP No. 84, receivables from CMS are not subject to the 90-day rule for non-admission.

Line 4 – Risk Corridor Payment Adjustments – Change

The reporting entity will need to estimate the Risk Corridor Payment Adjustment that is receivable (Line 4.1) or payable (Line 4.2) at year-end for each PDP, consistent with the reported experience through year-end. The receivable or payable should exclude any amounts already settled in cash, which should be reported in Line 1.13. An increase in a receivable or a decrease in a payable should be reported as a positive amount; a decrease in a receivable or an increase in a payable should be reported as a negative amount.

Line 5 – Earned Premiums

Earned premium = Premiums Collected +
Change in Due and Uncollected –
Change in Unearned and Advance Premium +
Change in Risk Corridor Payment Adjustments Payable/Receivable.

Note that Lines 5.11, 5.12, and 5.2 will exclude any amounts associated with the Risk Corridor Payment Adjustments, whereas Line 5.13 relates solely to the Risk Corridor Payment Adjustments.

Line 6	– Total Premiums	
		Sum of Lines 5.11 through 5.2 (Columns 1 and 3) and Sum of Lines 1.11 through 1.2 (Column 5).
Line 7	– Claims Paid	
		Follow similar rules as for premiums above.
Line 8	– Claims Reserves and Liabilities – Change	
		Follow similar rules as for premiums above.
Line 9	– Health Care Receivables – Change	
		For Lines 9.1 and 9.2, report the portion of Health Care Receivables (pharmacy rebates, loans to providers, etc.) that relate to the Part D coverage that is included in this supplement. This does not include any amounts receivable for the Risk Corridor Payment Adjustments, which are reported on Line 4.1.
Line 10	– Claims Incurred	
		Claims Incurred = Claims Paid + Change in Claim Reserves and Liabilities Change in Health Care Receivables
Line 11	– Total Claims	
		Sum of Lines 10.11 through 10.2 (Columns 1 and 3) and Sum of Lines 7.11 through 7.2 (Column 5).
Line 12	– Reinsurance Coverage and Low-Income Cost-Sharing	
Line 12.1	– Claims Paid Net of Reimbursements Applied	
		Report claims paid less amounts received for the following portions of any Part D coverage that is included in the supplement. These amounts are considered payments under an uninsured plan. Low-Income Subsidy (Cost-Sharing Portion). Reinsurance Coverage.
Line 12.2	– Reimbursements Received but Not Applied – Change	
		Report the change during the year in the liability for amounts received from CMS that are in anticipation of future uninsured claim payments by the PDP sponsor.
Line 12.3	– Reimbursements Receivable – Change	
		Report the change during the year for amounts due from CMS for uninsured claim payments already made by the PDP Sponsor. This will exclude amounts that are already reported on Line 12.2.
Line 12.4	– Health Care Receivables – Change	
		Report any portion of Health Care Receivables (pharmacy rebates, loans to providers, etc.) that relate to uninsured Part D coverage that is included in this supplement.