REPORT OF EXAMINATION

OF THE

AURORA NATIONAL LIFE ASSURANCE COMPANY

AS OF

DECEMBER 31, 2020

Insurance Commissioner

Filed on May 31, 2022

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Los Angeles, California
April 8, 2022

Honorable Ricardo Lara
Insurance Commissioner
California Department of Insurance
Sacramento, California

Dear Commissioner:

Pursuant to your instructions, an examination was made of the

AURORA NATIONAL LIFE ASSURANCE COMPANY

(hereinafter also referred to as the Company). Its home office is located at 16600 Swingley Ridge Road, Chesterfield, Missouri 63017. The Company's statutory home office is located at 818 West 7th Street, Los Angeles, California 90017.

SCOPE OF EXAMINATION

We have performed our multi-state examination of the Company. The previous examination of the Company was as of December 31, 2016. This examination covered the period from January 1, 2017 through December 31, 2020.

The examination was conducted in accordance with the National Association of Insurance Commissioners *Financial Condition Examiners Handbook (Handbook)*. The Handbook requires the planning and performance of the examination to evaluate the Company's financial condition, assess corporate governance, identify current and prospective risks, and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurer's surplus to be materially misstated both currently and prospectively.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management's compliance with Statutory Accounting

Principles. The examination does not attest to the fair presentation of the financial statements included herein. If, during the course of the examination, an adjustment is identified, the impact of such adjustment will be documented separately following the Company's financial statements.

This examination report includes findings of fact and general information about the Company and its financial condition. There might be other items identified during the examination that, due to their nature (e.g., subjective conclusions, proprietary information, etc.), were not included within the examination report but separately communicated to other regulators and/or the Company.

This was a coordinated examination with Missouri as the lead state of the Reinsurance Group of America, Incorporated. It was conducted concurrently with other insurance entities in the holding company group, including the Company's parent, RGA Reinsurance Company. The following states participated on the examination: California and South Carolina.

COMPANY HISTORY

The Company is a California domiciled life and disability insurer, which was incorporated under the laws of the state of California on April 27, 1961, and commenced business on December 1, 1961. The Company's primary business consists of administering the restructured life and annuity insurance business that it assumed from Executive Life Insurance Company (ELIC) on September 3, 1993 as part of ELIC's court approved Rehabilitation Plan.

On October 20, 2014, RGA Reinsurance Company (RGA Re) entered into a Stock and Asset Purchase Agreement with Swiss Re Life & Health America, Inc., to acquire all of the outstanding stock of the Company and certain assets and liabilities associated with the Company. The California Department of Insurance (CDI) approved this transaction on March 25, 2015.

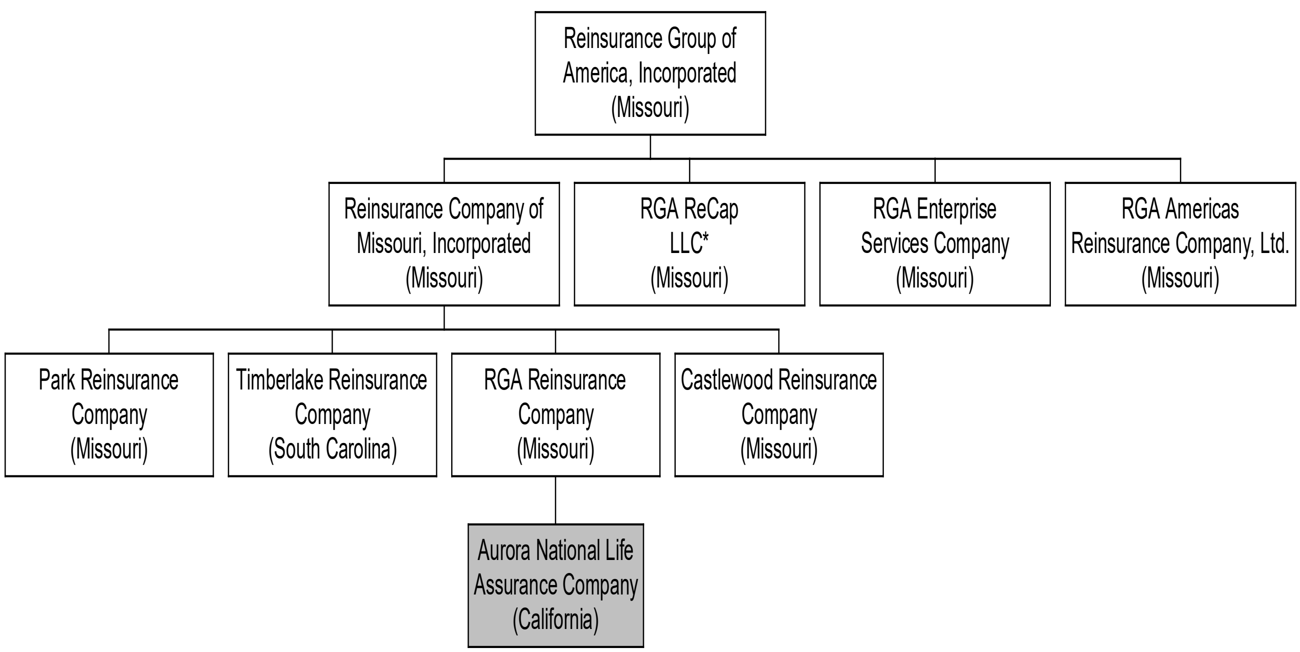
Dividends

On September 14, 2017, the CDI approved the Company's application of an extraordinary dividend to be paid to its parent company, RGA Re totaling $16,650,410. The dividend was paid in the amount of $13,355,000 from unassigned funds and $3,295,410 from gross paid-in and contributed surplus of the Company.

On December 16, 2019, the Company paid an extraordinary cash dividend to RGA Re totaling $14,700,000. The CDI approved this transaction in October 16, 2019.

MANAGEMENT AND CONTROL

Ultimate control of the Company is maintained by Reinsurance Group of America, Incorporated. Following is an abridged organizational chart. All ownership is 100%.



* RGA Recap LLC was incorporated on May 18, 2017, changing its name to RGA ReCap Incorporated.

The six members of the board of directors, who are elected annually, manage the business and affairs of the Company. Following are members of the board and principal officers of the Company serving at December 31, 2020:

Directors

Name and Location	Principal Business Affiliation
James P. Ash Wildwood, Missouri	Senior Vice President, Valuation & Financial Analysis RGA Enterprise Services Company
Brian J. Butchko Fenton, Missouri	Senior Vice President, Investment RGA Enterprise Services Company
Lawrence S. Carson Chesterfield, Missouri	Executive Vice President, Global Financial Solutions RGA Enterprise Services Company
Laura K. Cockrill Saint Louis, Missouri	Senior Vice President, Finance RGA Enterprise Services Company
Mark M. Hopfinger Chesterfield, Missouri	Senior Vice President, Structured Finance RGA Enterprise Services Company

Principal Officers

Name	Title
Laura K. Cockrill	President
Brian W. Haynes	Senior Vice President and Treasurer
Brett R. Walden	Vice President and Chief Financial Officer
Brian J. Butchko	Senior Vice President, Investment
Jeffrey G. Nordstrom	Senior Vice President, Chief Risk Officer
Kent P. Zimmerman	Senior Vice President, Tax
Eric M. Walta	Vice President, Appointed Actuary
Clifford R. Jenks	Secretary

Mr. David Wheeler was selected as a member of board of directors on May 11, 2020, and retired on August 3, 2020. Mr. Verene Duvall was appointed as a director on February 26, 2021, replacing Mr. David Wheeler. In accordance to the Company's amended bylaws on April 1, 2015, Article IV, Section 1, Number of Directors, the number of directors shall be no less than six, or no more than fifteen. It was observed that the number of directors serving as of December 31, 2020, was less than the minimum required by the bylaws. It is recommended that the Company adhere to the minimum number of board members in accordance to its bylaws.

Subsequent to the examination period, the Company elected six board members and the number of directors serving at December 31, 2021, adhered to the minimum number of board members in accordance to its bylaws.

Management Agreements

Administrative Service Agreement: Effective April 1, 2015, the Company entered into an Administrative Service Agreement with its parent company, RGA Reinsurance Company (RGA Re). Under the terms of the Agreement, RGA Re provides administrative services to the Company. Services include, but are not limited to, all services necessary to handle the finance, legal, tax, investment and insurance administration function in relation to the Company's business, excluding director policy administration services provided by a third-party administrator. The Company agrees to pay RGA Re for the actual costs, with no mark-up in providing the services. This Agreement was approved by the California Department of Insurance (CDI) on March 25, 2015. On December 14, 2015, the Company filed a Novation and Restatement of Administration Services Agreement with the CDI. Pursuant to the amended Agreement, RGA Enterprise Service Company (RGA ESC) replaced RGA Re as the service provider effective January 1, 2016, with all terms and conditions of this Agreement remaining the same as the terms in the above–mentioned Administrative Service Agreement with RGA Re. This Agreement was approved by the CDI on August 5, 2016. The Company paid fees in the amount of $1,138,745, $855,107, $621,205, and $582,564 to RGA ESC for the year of 2017, 2018, 2019, and 2020, respectively.

Investment Management Letter Agreement: Effective April 1, 2015, the Company entered into an Investment Management Letter Agreement with RGA Re. On December 14, 2015, the Company filed a Novation and Restatement of Investment Management with the CDI. Pursuant to the amended Agreement, RGA ESC replaced RGA Re as the service provider effective January 1, 2016, with all terms and conditions of this Agreement remaining the same as the terms with RGA Re, with the exclusion of the mortgage loan origination and servicing functions. In addition, the compensation fee for the services provided were reduced to: (1) the fees charged by outside investment advisors for management of the portion of the assets in the amount under management by such advisors; (2) one-twelfth of thirteen basis points of the average monthly Generally Accepted Accounting Principles (GAAP) book value of the assets in the account that are not under management by the outside investment advisors; and, (3) one-twelfth of five basis point of average monthly GAAP book value of the assets in the account that are not under management by the outside investment advisors. On August 5, 2016, the CDI approved the amended Agreement. The Company paid fees to RGA ESC for its services in the amount of $3,935,213, $3,777,313, $3,835,793, and $3,932,939 for the years of 2017, 2018, 2019, and 2020 respectively.

Mortgage Loan Origination and Servicing Agreement: Effective January 1, 2016, the Company entered into a Mortgage Loan Origination and Servicing Agreement with its affiliate, RGA ReCap LLC (RGA ReCap). Under the terms of the Agreement, RGA ReCap provides mortgage loan origination and servicing functions to the Company, which was previously provided by RGA Re under the approved Investment Management Letter Agreement. For compensation, the Company pays RGA ReCap: (1) the loan documentation fee, an underwriting fee and a loan origination fee in connection with any loan originated by or with the assistance of RGA Recap; (2) a service fee equal to the sum of the product obtained by multiplying the prior month ending outstanding principal balance of each loan by one-twelfth of the annual servicing fee rate; (3) a special service fee equal to the sum of the product obtained by multiplying the prior month ending outstanding principal balance of each specially serviced loan by one-twelfth of annual special servicing fee rate of twenty-five basis points; (4) additional servicing compensation which shall include all default interest, processing fees, assumption fees, modification fees, extension fees, liquidation fees, workout fees, investment income, late fees and other similar fees paid by borrower in connection with each loan or specially serviced loan; and (5) any interest or investment income earned on funds deposited in any escrow account or reserve account, to the extent permitted by law, and subject to the related loan document. The CDI approved the Agreement on March 3, 2016. Under the terms of the Agreement, the Company paid fees in the amount of $1,125,970, $1,178,730,

$1,359,800, and $1,407,020 to RGA ReCap for the years of 2017, 2018, 2019, and 2020, respectively.

Related Party Transactions

On October 1, 2020, the Company entered into a short-term, $15 million loan arrangement with RGA, Inc., with an interest rate of 0.48388%. The loan's maturity date was October 8, 2020 and Company paid $1,411 in interest. This transaction did not meet the threshold requirement for prior approval.

On December 18, 2020, the Company entered into a short-term, $25.2 million loan arrangement with RGA Americas Reinsurance Company, Ltd., with an interest rate of 0.48575%. The loan's maturity date was December 21, 2020 and Company paid $1,020 in interest. This transaction did not meet the threshold requirement for prior approval.

TERRITORY AND PLAN OF OPERATION

The Company is licensed to transact life and disability classes of insurance business in California, 45 other states, and the District of Columbia. However, licenses held in New Jersey, North Carolina, and Minnesota allow the Company to only service existing businesses. For the year 2020, the Company had $11.5 million in the renewal premium written. The Majority of the renewal premiums were primarily earned from policyholders written in the states of California, $2.3 million (19.9%); Texas, $1.0 million (9.1%); Florida, $0.8 million (7.1%); and Illinois, $0.76 million (6.7%). The 57.2% remainder of renewal premium written were generated from across the rest of the contiguous US states.

Current activities of the Company are predominantly concentrated on the servicing of restructured individual life and individual and group annuity blocks of business, which were transferred to the Company as part of the Executive Life Insurance Company (ELIC) Rehabilitation Plan (Rehabilitation Plan), which is discussed below.

During 2016, the Company became a member of the Federal Home Loan Bank of Des Moines, Iowa. As a result of the membership, the Company participates in programs designed to offer both liquidity and yield enhancement primarily through the issuance of guaranteed interest contracts. The Company began issuing guaranteed interest contracts in August 2016.

ELIC Rehabilitation Plan

On September 3, 1993, the Company assumed and reinsured substantially all of ELIC's restructured insurance and annuity contract (ELIC Restructured Contracts), all incident to the court-approved rehabilitation plan developed by the California Insurance Commissioner. In consideration of its assumption of the ELIC Restructured Contracts, the Company received over $6 billion of ELIC's assets. Effective February 27, 1994, certain contract holder elected to opt-out of the rehabilitation plan. The Company was paid approximately $2 billion, in accordance with the provisions of the Rehabilitation Plan on March 29, 1994.

As part of the Rehabilitation Plan, base assets trust and other trusts (ELIC Trusts) were established in order to obtain recoveries from lawsuits, and to liquidate other ELIC assets not transferred to the Company. Distributions totaling $1.417 billion were received from ELIC Trusts between 1995 and 2020. As of December 31, 2020, the Company had $7.4 million to be redistributed upon further research due to returned checks.

The Enhancement Agreement

Most states have life and health insurance guaranty associations that provide specific benefits to policyholders of insolvent life insurance companies. These payments are intended to minimize the effects of the insolvency on contract holders. In the ELIC insolvency, these associations have been represented by National Organization of Life and Health Guarantee Association (NOLHGA).

The ELIC Rehabilitation Plan includes an Enhancement Agreement (EA) among the Company, NOLHGA, certain Participating Life and Health State Guarantee Associations (PGAs), the Company's parent, and the rehabilitator. Pursuant to the EA, the account values of certain ELIC Restructured Contracts receive an enhancement amount from the

PGAs. The Company collects its respective portion of the enhancement amounts from the PGAs, passes its respective portion of the enhancement amounts from the PGAs, and passes it on to the contract holders. For a fee, the Company provides accounting and other record keeping services from the PGAs, relative to its obligations under the EA.

Amounts Received from PGAs

Under the terms of the EA, the PGAs are required to pay annual installments to the Company on April 30th of each year, based on the contracts in-force. Once a deposit is made by the PGAs, the Company is at risk for earning a higher rate than what is credited on those funds. The Company received approximately amount of $0.9 million, $0.8 million, $0.6 million, and $0.5 million for the years of 2017, 2018, 2019, and 2020, respectively, as advanced payments for the estimated portion of non-surrenderable contract benefit payments.

REINSURANCE

Assumed

The Company has no assumed reinsurance.

Ceded

For the ceded business, all existing rights and obligations under and in connection with the 95% Modco Coinsurance Agreement, between the Company's former parent company, Swiss Re, and the Company, were transferred to RGA Reinsurance Company (RGA Re) under the Modco Release, Consent, and Novation Agreement effective March 25, 2015. Under the terms of the Agreement, the Company cedes 95% of underwriting activity for the Company's policies inforce; 95% of the changes in reserves; and provides a modified coinsurance adjustment that includes realized capital gains and losses and 100% of policyholder administration related expenses, after providing primary risk reinsurance.

On December 31, 2020, the Company reported $1,963,702,633 of policyholder liabilities and contract claims, which included a modified coinsurance reserve of $1,865,517,502. In addition, the Company reduced the reported policyholder liability and contract claims by $6,024,154 relating to its yearly renewable term and monthly renewable term reinsurance agreements.

The Company's automatic cession agreements as of December 31, 2020 are summarized in the following table:

Line of Business and Type of Contract	Reinsurer's Name	Company's Retention	Reinsurer's Limit
Automatic Pool Treaties			
Interest Sensitive Whole Life	Various North American and European companies (both Authorized and Unauthorized)	Varies by year of issue, underwriting category (age and face amount), ranging from $25,000 to $1 million (1)	Pre – 10/1/84: $2 million Post – 10/1/84: $5 million
Interest Sensitive Group Life (Issued up to 12/31/89)	Various North American and European companies (both Authorized and Unauthorized)	Varies by year of issue, underwriting category (age and face amount), ranging from 50% of face amount up to a maximum of $1 million (1)	$5 million
Interest Sensitive Group Life (Issued 1/1/90 onwards)	Various North American companies (both Authorized and Unauthorized)	Varies by year of issue, underwriting category (age and face amount), ranging from 25% of face amount up to a maximum of $1 million	$5 million
Term Life	Various North American and European companies (both Authorized and Unauthorized)	None, starting 8/1/91 prior to 8/1/91, retention varies by year of issue, underwriting category (age and face amount), ranging from $25,000 to $1 million. (1)	Pre-10/1/83: $2 million Post- 10/1/83: $5 million
Single Premium Whole Life	Various North American and European companies (both Authorized and Unauthorized)	Varies by year of issue, underwriting category (age and face amount), ranging from $25,000 to $1 million. (1)	Pre – 10/1/83: $2 million Post – 10/1/83: $5 million
Coinsurance Treaty			
Term Life effective 8/1/91	Swiss Re Life (Authorized)	$0, Starting 8/1/91	$1 million
Modified Coinsurance Treaty			
Conventional	RGA Reinsurance Company (Authorized)	5% (2)	95%
Facultative			
Interest Sensitive Whole Life	Various North American companies (Authorized)	Depending on Underwriter's decision	No limits – based on amount accepted by the reinsurers

Line of Business and Type of Contract	Reinsurer's Name	Company's Retention	Reinsurer's Limit
Single Premium Whole Life	Various North American companies (Authorized)	Depending on Underwriter's decision	No Limits – based on amount accepted by the reinsurer
Monthly Renewable Term			
Interest Sensitive Group and Whole Life	Various North American and One European company (Authorized and Unauthorized)	Pre -3/1/96: 20% of the maximum retained Net Amount at Risk, up to $1 million Between 3/1/96 and 7/4/97: 43% of the maximum retained net amount at risk, up to $1 million Between 7/1/97 and 1/1/99: 45% of the maximum retained net amount at risk, up to $1 million Between 1/1/99 and 7/15/15: 68% of the maximum retained net amount at risk, up to $1 million Between 7/15/15 and 6/14/16: 91% of maximum retained Net Amount at Risk, up to $1 million Post 6/14/16: 93% of maximum retained Net Amount at Risk, up to $1 million	Pre -3/1/96: 80% of maximum retained Newt Amount at Risk Between 3/1/96 and 7/1/97: 57% of the maximum retained net amount at risk Between 7/1/97 and 1/1/99: 55% of the maximum retained net amount at risk. Post 1/1/99: 32% of the maximum retained net amount at risk Between 7/15/15 and 6/14/2016: 9% of the maximum retained net amount at risk Between 6/15/16 to current: 7% of the maximum retained net amount at risk

(1) Effective 10/1/94, the Company's net retention changed due to the reinsurance of a portion of the retained amount under the Monthly Renewable Term Treaty.
(2) The Company's modified coinsurance agreement with Swiss Re Life & Health America Inc. was novated to RGA Re, the Company's parent, on April 1, 2015.

ACCOUNTS AND RECORDS

Annual Statement

On July 1, 2019, Mr. Tim Matson retired as a director and was replaced by Mr. Brian Butchko on November 8, 2019, however, Mr. Brian Butchko was not included as a director on the 2019 Annual Statement, Jurat Page. The National Association of Insurance Commissioners (NAIC) Annual Statement instructions states "Enter all information completely as indicated by the format of page." It is recommended the Company comply with the NAIC Annual Statement Instructions and ensure all information is completely and accurately presented in its Annual Statements.

Subsequent to the examination period, the Company's 2021 Annual Statement Jurat Page properly disclosed all directors and complied with the NAIC Annual Statement.

A review was also made on the Company's 2020 Annual Statement, Note to Financial Statements. The following deficiencies were noted related to the Note 11.B, Federal Home Loan Bank (FHLB) Agreements in accordance to the NAIC Annual Statement Instructions:

(1) The Company failed to provide a description of how the borrowing capacity was determined at the Note 11.B.(2).
(2) The Company failed to disclose the total reserves established at the Note 11.B.(4).

It is recommended that the Company comply with the NAIC Annual Statement Instructions and ensure proper and adequate information is provided.

Subsequent to the examination period, the Company's 2021 Annual Statement, Note to the Financial Statements, 11.B.(2) and 11.B.(4) properly disclosed information pursuant to the NAIC's Annual Statement Instructions.

FINANCIAL STATEMENTS

The following financial statements are based on the statutory financial statements filed by the Company with the California Department of Insurance and present the financial condition of the Company for the period ending December 31, 2020. The accompanying comments to the amounts reported in the annual statements should be considered an integral part of the financial statements. There were no examination adjustments made to the financial statements as a result of the examination.

Statement of Financial Condition as of December 31, 2020

Summary of Operations and Capital and Surplus Account for the Year Ended December 31, 2020

Reconciliation of Capital and Surplus as Regards Policyholders from December 31, 2016 through December 31, 2020

Statement of Financial Condition
as of December 31, 2020

Assets	Ledger and Nonledger Assets	Assets Not Admitted	Net Admitted Assets	Notes
Bonds	$ 2,230,248,128	$	$ 2,230,248,128	(1)
Common stocks	28,133,466		28,133,466	
Mortgage loans on real estate: First liens	451,583,505		451,583505	
Cash and short-term investments	46,750,857		46,750,857	
Contract loans	99,214,690		99,214,690	
Other invested assets	47,083,514		47,083,514	
Receivable for securities	11,541,741		11,541,741	
Investment income due and accrued	25,855,583		25,855,583	
Premiums and agents' balances in course of collection	(1,172,475)		(1,172,475)	
Premiums , agents' balances and installments booked but deferred and not yet due (including $0 earned but unbilled premiums)	177,564		177,564	
Amount recoverable from reinsurers	65,791		65,791	
Other amounts receivable under reinsurance contracts	1,273		1,273	
Current federal and foreign income tax recoverable and interest thereon	132,709		132,709	
Guaranty funds receivable or on deposit	(250,023)		(250,023)	
Aggregate write-ins for other than invested assets	1,143,860	1,143,860	0	
Total assets	$ 2,940,510,182	$ 1,143,860	$ 2,939,366,322	

Liabilities, Surplus and Other Funds			Notes
Aggregate reserve for life contracts		$ 1,963,702,633	(2)
Liability for deposit-type contracts		719,303,448	(2)
Contract claims: Life		15,943,598	(2)
Premiums and annuity considerations for life and accident and health contracts received in advance less $0 discount; including $0 accident and health premiums		93,425	
Other amounts payable on reinsurance		4,630,588	
Commissions to agents due or accrued – life and annuity contracts		8,465	
Taxes, licenses and fees due or accrued, excluding federal incomes taxes		(26,190)	
Net deferred tax liability		21,241,275	
Amounts withheld or retained by reporting entity as agent or trustee		(20,618)	
Remittances and items not allocated		2,686,429	
Asset valuation reserve		28,121,021	
Payable to parent, subsidiaries and affiliates		20,860	
Payable for securities		829,658	
Amounts withheld or retained by company for account of others		20,000	
Aggregate write-ins for liabilities		17,143,302	
Total liabilities		2,793,677,892	
Common capital stock	$ 3,000,000		
Gross paid-in and contributed surplus	106,880,818		
Unassigned funds (surplus)	35,807,611		
Surplus as regards policyholders		$ 142,688,430	
Total liabilities, surplus and other funds		$ 2,939,366,322	

Summary of Operations and Capital and Surplus Account
for the Year Ended December 31, 2020

Summary of Operations

Premiums and annuity considerations	$	428,363	
Considerations for supplementary contracts with life contingencies		15,777	
Net Investment Income		143,859,016	
Amortization of Investment Maintenances Reserve		4,652,135	
Commissions and expense allowances on reinsurance ceded		98,551	
Reserve adjustments on reinsurance ceded		(209,835,734)	
Miscellaneous Income:		71,470	
Total			(60,710,421)
Death benefits	$	3,386,301	
Matured endowments(excluding guaranteed annual pure endowments)		115,781	
Annuity benefits		4,914,283	
Disability benefits and benefits under accident and health contracts		13,470	
Surrender benefits and withdrawals for life contracts		1,163,834	
Interest and adjustments on contract or deposit-type contract funds		841,487	
Payments on supplementary contracts with life contingencies		234,697	
Increase in aggregate reserves for life and accident and health contracts		(82,509,554)	
Commissions on premiums, annuity considerations and deposit-type contract		103,254	
General insurance expenses and fraternal expenses		830,118	
Insurance taxes, licenses and fees, excluding federal income taxes		289,936	
Increase in loading on deferred and uncollected premiums		173	
Aggregate write-ins for deductions		(103)	
Total			(70,616,323)
Net gain from operations after dividends to policyholders and before federal and foreign income taxes			9,905,903
Federal and foreign income taxes incurred			6,036,697
Net gain from operations after dividends to policyholders, after capital gains tax and before realized capital gains			3,869,206
Net realized capital losses			(926,868)
Net income			$ 2,942,338

Capital and Surplus Account

Surplus as regards policyholders, December 31, 2019			$ 137,659,688
Net income	$	2,942,338	
Change in net unrealized capital losses		2,510,528	
Change in net deferred income tax		4,910,856	
Change in nonadmitted assets		2,648,987	
Change in liability for reinsurance in unauthorized companies		(1,835)	
Change in asset valuation reserve		(4,982,051)	
Change in surplus as regards policyholders for the year			8,028,822
Surplus as regards policyholders, December 31, 2020			$ 145,688,430

Reconciliation of Capital and Surplus
from December 31, 2016 through December 31, 2020

	Gain in Surplus	Loss in Surplus	
Surplus as regards policyholders, December 31, 2016			$ 126,531,228
Net income	$ 30,566,999	$	
Change in unrealized capital gains	6,673,977		
Change in net deferred income tax	24,426,977		
Change in nonadmitted assets		1,121,183	
Change in liability for reinsurance in unauthorized companies		4,334	
Change in asset valuation reserve		10,034,052	
Surplus adjustments – Paid-in		3,295,410	
Dividends to stockholders		28,055,000	
Total gains and losses	$ 61,667,181	$ 42,509,979	
Net decrease in surplus as regards policyholders			19,157,202
Surplus as regards policyholders, December 31, 2020			$ 145,688,430

COMMENTS ON FINANCIAL STATEMENT ITEMS

(1) Bonds

As of December 31, 2020, the Company pledged assets totaling $491,000,000 to the Federal Home Loan Bank of Des Moines (FHLB), to support the issuance of guaranteed interest contracts. With a written request to the FLHB, the Company can withdraw any pledged assets that are over and above the amount needed to support any outstanding guaranteed interest contracts. The excess assets are not restricted and are under the control of the Company.

(2) Aggregate Reserve for Life Contracts
Liability for Deposit-type Contacts
Contract Claims: Life

Risk and Regulatory Consulting, LLC (RRC) was engaged by the Missouri Department of Insurance to perform an actuarial review in conjunction with the risk-focused financial examination of RGA Group, which included all insurance entities under the group as of December 31, 2020. Based on the analysis performed by RRC, and an additional review performed by a Senior Life Actuary from the California Department of Insurance, the Company's December 31, 2020 reserves were determined to be reasonably stated, and have been accepted for purposes of this examination.

SUMMARY OF COMMENTS AND RECOMMENDATIONS

Current Report of Examination

Management and Control: – Directors (Page 4): It is recommended that the Company adhere to its bylaws minimum board member requirements.

Account and Records – Annual Statement (Page 12): It is recommended the Company comply with the National Association of Insurance Commissioners (NAIC) Annual Statement Instructions and ensure all information is completely and accurately presented in its Annual Statements.

Previous Report of Examination

None.

ACKNOWLEDGMENT

Acknowledgment is made of the cooperation and assistance extended by the Company's officers and employees during the course of this examination.

Respectfully submitted,

Voong, Amy Digitally signed by Voong, Amy
Date: 2022.05.31 14:47:26
-07'00'

Amy Voong, CFE
Examiner-In-Charge
Associate Insurance Examiner
Department of Insurance
State of California

Briggs, Anjanette Digitally signed by Briggs, Anjanette
Date: 2022.05.31 15:00:56
-07'00'

Anjanette Briggs, CFE
Senior Insurance Examiner, Supervisor
Department of Insurance
State of California