

Company:	
Document:	Disclosure Requirements for Insurance Entities – STATUTORY
Balance Sheet Date:	December 31, 2025

## Explanatory Comments

The following is a list of the primary disclosure requirements for statutory basis financial statements of insurance companies as required by Statutory Accounting Principles. This checklist is current through the National Association of Insurance Commissioners' (NAIC) *Accounting Practices and Procedures Manual as of March 2025*. It is intended for use in connection with preparing and evaluating disclosures contained in the annual audited statutory financial statements of an insurance entity.

Annual statutory financial statements which are not accompanied by annual statement exhibits and schedules (e.g. annual audit report) shall include all disclosures required by the SSAP's based on the applicability, materiality and significance of the item to the insurer. [Preamble par. 63]

	Yes	No	N/A	Comments
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### GENERAL

1. For a full presentation in conformity with statutory accounting principles (SAP), are the following financial statements presented:
  - a. Balance sheet?
  - b. Statement of income (operations)?
  - c. Statement of cash flows?
  - d. Description of accounting policies?
  - e. Notes to the financial statements?
2. Are the financial statements suitably titled?
3. Does each statement include a general reference to the notes indicating that they are an integral part of the financial statement presentation?
4. Does the format of the financial statements follow the annual statement format, except items may be combined?


### BALANCE SHEETS

#### Assets

##### A. Investments – Bonds

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1. Have the following been disclosed with respect to investments in bonds: [SSAP No. 26 par. 30]
  - a. Fair values in accordance with SSAP No. 100? (See [Fair Value of Financial Instruments](#))

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b. Concentrations of credit risk in accordance with SSAP 27? (See Off-Balance Sheet and Credit Risk Disclosures)				
c. Basis at which bonds, mandatory convertible securities, and SVO-identified bond ETF investments are stated?				
d. Amortization method for bonds and mandatory convertible securities, and if elected by the reporting entity, the approach for determining the systematic value for SVO-identified securities per par 34.  If utilizing systematic value measurement method approach for SVO-identified investments, the reporting entity must include the following information:				
1) Whether the reporting entity consistently utilizes the same measurement method for all SVO-identified investments (e.g., fair value or systematic value). If different measurement methods are used, information on why the reporting entity has elected to use fair value for some SVO-identified investments and systematic value for others.				
2) Whether SVO-identified investments are being reported at a different measurement method from what was used in an earlier current-year interim and/or in a prior annual statement. (For example, if reported at systematic value prior to the sale, and then reacquired and reported at fair value.) This disclosure is required in all interim reporting periods and in the year-end financial statements for the year in which an SVO-identified investment has been reacquired and reported using a different measurement method from what was previously used for the investment. (This disclosure is required regardless of the length of time between the sale/reacquisition of the investments, but is only required in the year in which the investment is reacquired.)				

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3) Identification of securities still held that no longer qualify for the systematic value method. This should separately identify those securities that are still within the scope of SSAP No. 26 and those that are being reported under a different SSAP.				
e. For each annual balance sheet presented, the book / adjusted carrying values, fair values, excess of book / carrying value over fair value or fair value over book / adjusted carrying values for each pertinent bond or assets receiving bond treatment, by category and subcategory as reported in annual statement Schedule D, Part 1, Section 1 (Issuer Credit Obligations), and Section 2 (Asset-Backed Securities) .				
f. For the most recent balance sheet, the book / adjusted carrying values and the fair values of bonds and assets receiving bond treatment, reported in statutory Annual Statement Schedule D – Part 1A due: Note: Securities not due at a single maturity date, such as mortgage-backed securities, may be disclosed separately rather than allocated over several maturity groupings; if allocated, disclose the basis for allocation.				
1) In one year or less (including items without maturity date which are either not payable on demand or not in good standing)?				
2) After one year through five years?				
3) After five years through ten years?				
4) After ten years (including items without a maturity date which are either not payable on demand or not in good standing)?				
g. For each period for which results of operations are presented, the proceeds from sales of bonds and assets in scope of this Statement and gross realized gains and gross realized losses on such sales?				

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h. Information about bonds in an unrealized loss position for which other-than-temporary declines in value have not been recognized. (See <a href="#">L. Investments – Impairment of Debt and Equity Securities</a> ) [SSAP No. 26 par. 30h-30l]				

## B. Investments - Preferred Stock

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1. Have the following been disclosed with respect to investments in preferred stock: [SSAP No. 32 par. 19a-d]

- Fair values in accordance with SSAP No. 100? (See [Fair Value of Financial Instruments](#))
- Concentrations of credit risk in accordance with SSAP 27? (See [Financial Instruments With Concentrations of Credit Risk](#))
- Basis at which the preferred stocks are stated?
- A description and amount of preferred stock that is restricted and the nature of the restriction?


2. Information about preferred stock in an unrealized loss position for which other-than-temporary declines in value have not been recognized. (See [L. Investments – Impairment of Debt and Equity Securities](#)) [SSAP No. 32 par. 19e-h]

## C. Investments - Common Stock (Excluding Affiliates)

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1. Have the following been disclosed with respect to investments in common stocks: [SSAP No. 30 par. 18]

- Basis at which the securities are stated?
- A description, as well as the amount, of common stock that is restricted outside of FHLB agreements and the nature of the restriction.
- Information about common stocks in an unrealized position for which other-than-temporary declines in value have not been recognized. (See [L. Investments – Impairment of Debt and Equity Securities](#))


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2. Have the following been disclosed with respect to FHLB stock: [SSAP No. 30 par. 19] <b>Note:</b> For FHLB agreements, the following information shall be disclosed in the financial statements for current and prior year and between general account and separate account activity. The information in the disclosures shall be presented gross even if a right to offset per SSAP No. 64 exists.				
a. General description of FHLB agreements, with information on the nature of the agreement, type of borrowing (advances, lines of credit, borrowed money, etc.) and use of the funding.				
b. Amount of FHLB capital stock held, in aggregate, and classified as follows:				
1) membership stock (separated by Class A and Class B)				
2) Activity stock				
3) Excess stock				
c. For membership stock, has the amount of FHLB capital stock eligible for redemption and the anticipated timeframe for redemption been reported:				
1) less than 6 months				
2) 6 months to 1 year,				
3) 1 year to 3 years, and				
4) 3 to 5 years.				
d. Amount (fair value and carrying value) of collateral pledged to the FHLB as of the reporting date. In addition, report the maximum amount of collateral pledged to the FHLB at any time during the current reporting period. (Maximum shall be determined on the basis of carrying value, but with fair value also reported)				

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e. Aggregate amount of borrowings at the reporting date from the FHLB, reflecting compilation of all advances, loans, funding agreements, repurchase agreements, securities lending, etc., outstanding with the FHLB, and classify whether the borrowing is in substance:				
1) debt (SSAP No. 15)				
2) a funding agreement (SSAP No. 52)				
3) Other				
f. For funding agreements, report the total reserves established. Report the maximum amount of aggregate borrowings from an FHLB at any time during the current reporting period, the actual or estimated maximum borrowing capacity as determined by the insurer, with a description of how the borrowing capacity was determined, and whether current borrowings are subject to prepayment penalties.				
3. For each annual reporting period, has a comparable disclosure to the prior annual reporting period of the number of 5GI* securities been included? [SSAP No.1 par. 28] Have the securities been separated by investment type, and the book adjusted carrying value and fair value for those securities. <b>Note:</b> This disclosure is required in the interim, pursuant to the Preamble, if there have been significant changes from the prior annual reporting statement. If significant changes require inclusion in more than one quarterly reporting statement in a single annual reporting year, the comparison period shall continue to reflect the prior reporting period.				
<b>D. Investments - Common Stocks of Subsidiaries, Controlled (SCA) or Affiliated Entities</b> <b>Note:</b> Joint ventures, partnerships, and limited liability companies are accounted for under the guidance in SSAP No. 48. As such, those entities are not subject to the disclosure in SSAP No. 97, unless specifically directed by SSAP No. 48.				

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1. Within the scope of this statement, did the entity disclose the SCA balance sheet value? (admitted and nonadmitted) as well as information received from the NAIC in response to the SCA filing (e.g., date and type of filing, NAIC valuation amount, whether resubmission of filing is required). This disclosure shall include an aggregate total of all SCAs (except paragraph 8.b.i. entities) with detail of the aggregate gross value under this statement with the admitted and nonadmitted amounts reflected on the balance sheet for all SCA investments (except paragraph 8.b.i. entities) [SSAP No. 97 par 35.]				
a. For all periods presented, a reporting entity whose shares of losses in an SCA exceeds its investment in the SCA shall disclose its share of losses. (This is required regardless of a guarantee or commitment of future financial support to the SCA.) This disclosure shall include the following:				
1) The reporting entity's accumulated share of the SCA losses not recognized during the period that the equity method was suspended;				
2) The reporting entity's share of the SCA's equity, including negative equity;				
3) Whether a guaranteed obligation or commitment for financial support exists;				
4) The amount of the recognized guarantee under SSAP No. 5. <b>Note:</b> This disclosure shall apply beginning in the period the SCA's equity initially falls below zero and shall continue to be disclosed as long as the SCA investment is in a deficit position. Additionally, the reporting entity shall detail in a narrative disclosure whether losses in the SCA have impacted other investments as required by INT 00-24: EITF 98-13: Accounting by an Equity Method Investor for Investee Losses When the Investor Has Loans to and Investments in Other Securities of the Investee and EITF 99-10: Percentage Used to Determine the Amount of Equity Method Losses.				

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5) When determining the amounts of its equity method losses when previous losses have reduced the common stock investment account to zero, has the reporting entity utilized a single entity-wide approach and has the selected policy been disclosed? (INT 00-24)				
2. For investments in common stocks of subsidiaries, controlled, or affiliated entities which exceed 10% of admitted assets of the insurer, has the following information been disclosed: [SSAP No. 97 par. 36]				
a. Do the financial statements of the reporting entity disclose:				
1) the name of each subsidiary, controlled or affiliated (SCA) entity and percentage of ownership of common stock?				
2) the accounting policies of the reporting entity with respect to investments in these entities?				
3) the difference, if any, between the amount at which the investment is carried and the amount of underlying equity in net assets, i.e., goodwill, other nonadmitted assets, fair value or discounted fair value adjustments, adjustments pursuant to SSAP No. 25 Par. 20.d. and the accounting treatment of the difference?				
b. For each subsidiary, controlled or affiliated entity for which a quoted market price is available, the aggregate value of each investment based on the quoted price and the difference, if any, between the amount at which the investment is carried and the quoted price?				
c. Summarized information as to assets, liabilities, and results of operations for subsidiary controlled or affiliated entities, either individually or in groups?				
d. Material effects of possible conversions, exercises or contingent issuances of outstanding convertible securities?				



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e. For those subsidiary, controlled or affiliated entities in which the reporting entity elected, or was required, to change its valuation method as described in paragraph 14 of SSAP No. 97, a description of the reason for the change and the amount of adjustment recorded as unrealized gains or losses, and whether commissioner approval was obtained?				
3. For a reporting entity that reports an investment in an insurance SCA (per paragraph 8.b.i.) for which the audited statutory equity reflects a departure from the NAIC statutory accounting practices and procedures (e.g., permitted or prescribed practices) has the entity disclosed the following: [SSAP No. 97 par. 37]				
a. A description of the accounting practice, with a statement that the practice differs from the NAIC statutory accounting practices and procedures.				
b. The monetary effect on net income and surplus reflected by the insurance SCA as a result of using an accounting practice that differed from NAIC statutory accounting practices and procedures.				
c. Whether the RBC of the insurance SCA would have triggered a regulatory event had it not used a prescribed or permitted practice.				
d. The reported entity's investment in the insurance SCA per the audited statutory equity, and the investment in the insurance SCA the reporting entity would have reported if the insurance SCA had completed statutory financial statements in accordance with the NAIC statutory accounting practices and procedures.				
4. For a reporting entity that calculates its investment in a foreign insurance subsidiary by adjusting annuity GAAP account value reserves using CARVM and the related Actuarial Guidelines, have the interest rates and mortality assumptions used as described by the insurance department of the foreign country been disclosed? [SSAP No. 97 par. 38]				

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5. Have all commitments or contingent commitments to subsidiary, controlled or affiliated entities been disclosed (e.g., guarantees or commitments to provide additional capital contributions)? [SSAP No. 97 par. 39]				
6. For investments in impaired subsidiary, controlled or affiliated entities, have the following been disclosed in the year of an impairment write-down: [SSAP No. 97 par. 40]				
a. A description of the impaired assets and the facts and circumstances leading to the impairment?				
b. The amount of the impairment and how fair value was determined?				
7. For reporting entities that utilize the look-through approach for the valuation of a downstream noninsurance holding company instead of obtaining financial statements of the downstream noninsurance holding company, has the following been disclosed: [SSAP No. 97 par. 42]				
a. The name of the downstream noninsurance holding company?				
b. The carrying value of the investment in the downstream noninsurance holding company?				
c. The fact that the financial statements of the downstream noninsurance holding company are not audited?				
d. The fact that the reporting entity has limited the value of its investments in the downstream noninsurance holding company to the value contained in the audited financial statements, including adjustments required by this statement, of SCA entities and/or non-SCA SSAP No. 48 entities owned by the downstream noninsurance holding company and valued in accordance with paragraphs 22 through 25 of SSAP 97?				

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e. The fact that all liabilities, commitments, contingencies, guarantees or obligations of the downstream noninsurance holding company, which are required to be recorded as liabilities, commitments, contingencies, guarantees or obligations under applicable accounting guidance, are reflected in the reporting entity's determination of the carrying value of the investment in the downstream noninsurance holding company, if not already recorded in the financial statements of the downstream noninsurance holding company?				

**E. Investments - Joint Ventures, Partnerships and Limited Liability Companies (Excluding Investments in Partnerships and Limited Liability Companies that Invest in Low Income Housing Tax Credit Property)**

1. For investments in joint ventures, partnerships and limited liability companies that exceed 10% of the admitted assets of the insurer, has the following been disclosed: [SSAP No. 48 par. 21]

a. The name of each joint venture, partnership and limited liability company and percentage of ownership?				
b. The accounting policies of the insurer with respect to investments in these entities?				
c. The difference, if any, between the amount at which the investment is carried and the amount of underlying equity in net assets, (i.e., non-admitted goodwill, other non-admitted assets, market value or discounted market value adjustments) and the accounting treatment of the difference?				
d. For each joint venture, partnership and limited liability company for which a quoted market price is available, aggregate value of each investment based on the quoted market price?				
e. Summarized information as to assets, liabilities, and results of operations for joint ventures, partnerships and limited liability companies, either individually or in groups?				

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2. Have all commitments or contingent commitments (e.g., guarantees or commitments to provide additional capital contributions) to a joint venture, partnership, or limited liability company been disclosed? [SSAP No. 48 par. 22]				
3. For impaired investments in joint ventures, partnerships and limited liability companies, the following, in the year of an impairment write-down: [SSAP No. 48 par. 23]				
a. A description of the impaired assets and the facts and circumstances leading to the impairment?				
b. The amount of the impairment and how fair value was determined?				
4. Any change due to the requirements of paragraph 8 of SSAP No. 48 shall be disclosed per SSAP No. 3? [SSAP No. 48 par. 24] <b>Note:</b> Paragraph 8 deals with the elimination of a previously existing difference between the fiscal year of a reporting entity and that of its equity investee sometimes called reporting lag.				

#### F. Investments - Mortgage Loans

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1. Have the following disclosures been made with respect to mortgage loans: [SSAP No. 37 par. 25]				
a. Fair values in accordance with SSAP No. 100? (See <a href="#">Fair Value of Financial Instruments</a> )				
b. Concentrations of credit risk in accordance with SSAP No. 27? (See <a href="#">Financial Instruments With Concentrations of Credit Risk</a> ) <b>NOTE:</b> Include: 1) information as to how and to what extent management monitors the credit quality of its mortgage loans in an ongoing manner, and 2) to assess the quantitative and qualitative risks arising from the credit quality of its mortgage loans. To meet these objectives reporting entities shall provide information, aggregated by type, about the credit quality of mortgage loans including the following:				
I. A description of the credit quality indicator				

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II. The recorded investment in mortgage loans by credit quality indicator				
III. For each credit quality indicator, the date or range of dates in which the information was updated for that credit quality indicator				
c. Description of the valuation basis of the mortgage loans?				
d. The minimum and maximum rate of interest received for new loans made by category?				
e. The maximum percentage of any one loan to the value of security at the time of the loan?				
f. An age analysis of mortgage loans, aggregated by type, with identification of mortgage loans in which the insurer is a participant or co-lender in a mortgage loan agreement capturing (disclosing):				
1) Recorded investment of current mortgage loans?				
2) Recorded investment of mortgage loans past due classified as 30-59 days past due, 60-89 days past due, 90-179 days past due, and greater than 180 days past due?				
3) Recorded investment of mortgage loans 90 days and 180 days past due still accruing interest?				
4) Interest accrued for mortgage loans 90 days and 180 days past due?				
5) Recorded investment and number of mortgage loans where interest has been reduced, by percent reduced?				
g. Taxes, assessments and any amounts advanced and not included in mortgage loan total?				
2. Have the following additional disclosures been made with respect of impaired loans: [SSAP No. 37 par. 26]				
a. The total recorded investment in impaired loans, aggregated by type, at the end of each period?				

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1) The amount of that recorded investment for which there is a related allowance for credit losses determined in accordance with this statement and the amount of that allowance?				
2) The amount of that recorded investment for which there is no related allowance for credit losses determined in accordance with this statement?				
3) The total recorded investment in impaired loans subject to a participant or co-lending mortgage loan agreement for which the reporting entity is restricted from unilaterally foreclosing on the mortgage loan?				
b. The entity's policy for recognizing interest income on impaired loans, including how cash receipts are recorded?				
c. For each period for which results of operations are presented?				
1) The average recorded investment, aggregated by type, in the impaired loans during each period?				
2) The related amount of interest income recognized during the time within that period that the loans were impaired?				
3) The recorded investments on nonaccrual status pursuant to SSAP No. 34, paragraph 6?				
4) The amount of interest income recognized using a cash-basis method of accounting during the time within that period that the loans were impaired?				
d. For each period for which results of operations are presented has the following activity in the allowance for credit losses been disclosed:				
1) The balance in the allowance for credit losses account at the beginning and end of each period?				
2) Additions charged to operations?				

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3) Direct write-downs charged against the allowance?				
4) Recoveries of amounts previously written off?				
e. The aggregate amount of mortgage loans derecognized as a result of foreclosure and the corresponding amounts of:				
1) Real estate collateral recognized				
2) Other collateral recognized				
3) Receivables recognized from a government guarantee of the foreclosed mortgage loan				

#### G. Investments - Restructured Debt

1. For restructured debt in which the company is a creditor, have the following been disclosed as of the date of each balance sheet presented: [SSAP No. 36 par. 23]

a. The recorded investment in the loans for which impairment has been recognized in accordance with SSAP No. 36?				
b. The related realized capital loss?				
c. The amount of commitments, if any, to lend additional funds to debtors owing receivables whose terms have been modified in troubled debt restructuring?				
d. The creditor's income recognition policy for interest income on an impaired loan?				
e. For restructurings that occurred during the annual reporting period, aggregated by type of instrument, qualitative and quantitative information on (1) how the items were modified and (2) the financial effects of the modifications?				

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- f. If restructured within the previous 12 months and there has been a payment default during that period, qualitative and quantitative information about the defaulted instruments, aggregated by type of instrument, including: (1) type of instruments that defaulted and (2) the amount of recorded investments for which default occurred?

Yes	No	N/A	Comments

#### H. Investments - Reverse Mortgages

1. For reverse mortgages, have the following been disclosed: [SSAP No. 39 par. 15]

- a. A description of the reporting entity's accounting policies and methods, including the statistical methods and assumptions used in calculating the reserve?
- b. General information regarding the reporting entity's commitment under the agreement?
- c. The reserve amount that is netted against the asset value?
- d. Investment income or loss recognized in the period as a result of the re-estimated cash flows?


#### I. Investments - Asset Backed Securities SSAP 43

1. For asset-backed securities, have the following been disclosed: [SSAP No. 43 par. 44]

- a. Fair values in accordance with SSAP No. 100? (See [Fair Value of Financial Instruments](#))
- b. Concentrations of credit risk in accordance with SSAP No. 27? (See [Financial Instruments With Concentrations of Credit Risk](#))
- c. The basis at which asset-backed securities are stated?
- d. The adjustment methodology used for each type of security (prospective or retrospective)?




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e. Descriptions of sources used to determine prepayment assumptions? <b>Note:</b> Sources should be applied consistently: public market quotes; fair value provided by the broker; management estimate; pricing service; pricing matrix				
f. Are all securities within the scope of this statement with a recognized other-than-temporary impairment, disclosed in the aggregate, classified on the basis for the other-than-temporary impairment: (1) intent to sell, (2) inability or lack of intent to retain the investment in the security for a period of time sufficient to recover the amortized cost basis, or (3) present value of cash flows expected to be collected is less than the amortized cost basis of the security?				
g. For each security with a recognized other-than-temporary impairment, currently held by the reporting entity, as the present value of cash flows expected to be collected is less than the amortized cost basis of the securities:				
1) The amortized cost basis, prior to any current-period other-than-temporary impairment?				
2) The other-than-temporary impairment recognized in earnings as a realized loss?				
3) The fair value of the security?				
4) The amortized cost basis after the current-period other-than-temporary impairment?				
h. Information about asset-backed securities in an unrealized position for which other-than-temporary declines in value have not been recognized. (See <a href="#">L. Investments – Impairment of Debt and Equity Securities</a> )				

**J. Investments - Real Estate**

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1. Has real estate that has been classified as held for sale been separately disclosed either on the face of the balance sheet or in the notes to the financial statements? [SSAP No. 90 par. 33]				
2. For an entity that recognizes an impairment loss with respect of investments in real estate, have the following been disclosed: [SSAP No. 90 par. 35]				
a. A description of the impaired assets and the facts and circumstances leading to the impairment?				
b. The amount of the impairment loss and how fair value was determined?				
c. The caption in the statement of operations in which the impairment loss is included?				
3. In the period in which a long-lived asset has been sold or classified as held for sale, have the following been disclosed: [SSAP No. 90 par. 36]				
a. A description of the facts and circumstances leading to the expected disposal, the expected timing of that disposal?				
b. The gain or loss recognized and if not separately presented on the face of the summary of operations, the caption in the summary of operations that includes that gain or loss				
4. If the reporting entity decided not to sell an asset that was previously classified as held for sale, has it disclosed the facts and circumstances leading to the decision to change the plan to sell the asset; its effect on the results of operations for the period and any prior periods presented? [SSAP No. 90 par. 37]				
5. For an entity that engages in retail land sales operations have the following been disclosed: [SSAP No. 40 par. 26]				
a. Maturities of accounts receivables for each of the five years following the date of financial statements?				
b. Delinquent accounts receivable and the method(s) for determining delinquency?				

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c. The weighted average and range of stated interest rates of receivables?				
d. Estimated total costs and estimated dates of expenditures for improvements for major areas from which sales are being made over each of the five years following the date of the financial statements?				
e. Recorded obligations for improvements?				

6. For an entity that holds real estate investments with participating mortgage loan features have the following been disclosed: [SSAP No. 40 par. 28]

- a. Aggregate amount of participating mortgage obligations at the balance-sheet date, with separate disclosure of the aggregate participation liabilities and related debt discounts?
- b. Terms of participation by the lender in either the appreciation in the fair value of the mortgaged real estate project or the results of operations of the mortgaged real estate project, or both?


#### K. Investments - Mezzanine Real Estate Loans

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1. For entities with mezzanine real estate loans, do disclosures include the information required of mortgage loans from SSAP No. 37 paragraphs 25-27? (See Invested Assets – Mortgage Loans, above) [SSAP No. 83 par. 6]

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#### L. Investments – Impairment of Debt and Equity Securities

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1. For each balance sheet presented, all bonds in an unrealized loss position for which other-than-temporary declines in value have not been recognized. [SSAP No. 26 par. 30h-30l, SSAP No. 30 par. 17c-17f, SSAP No. 32 par. 18e-18h, SSAP No. 43 par. 51h-51l]

- a. The aggregate amount of unrealized losses (that is, the amount by which cost or amortized cost exceeds fair value) and

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b. The aggregate related fair value of bonds and equity securities with unrealized losses.				
2. The disclosures in 1a. and 1b. above should be segregated by those securities that have been in a continuous unrealized loss position for less than 12 months and those that have been in a continuous unrealized loss position for 12 months or longer, using fair values determined in accordance with SSAP No. 100.				
3. As of the most recent balance sheet date presented, additional information should be included describing the general categories of information that the investor considered in reaching the conclusion that the impairments are not other-than-temporary.				
4. When it is not practicable to estimate fair value, the investor should disclose the following additional information, if applicable, as of each date for which a statement of financial position is presented in its annual financial statements.				
a. The aggregate carrying value of investment not evaluated for impairment, and				
b. The circumstances that may have a significant adverse effect on the fair value.				
5. For securities sold, redeemed or otherwise disposed as a result of a call or tender offer feature (including make whole call provisions), disclose the number of CUSIPs sold, disposed or otherwise redeemed and the aggregate amount of investment income generated as a result of a prepayment penalty and/or acceleration fee.				
6. With the transition to incorporate the principle-based bond concepts effective January 1, 2025, to enable regulators the ability to identify the impact of securities reclassified under the bond definition, has the entity disclose the following for the 2025 first quarter financial statement [SSAP No. 26 par. 47]:				
a. Aggregate book adjusted carrying value for all securities reclassified off Schedule D-1.				

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	Yes	No	N/A	Comments
b. Aggregate book adjusted carrying value after transition for all securities reclassified off Schedule D-1 that resulted with a change in measurement basis. Note: This shall be a subset of paragraph 47.a. and captures the securities that moved from an amortized cost to a fair value measurement method under the lower of amortized cost or fair value approach.				
c. Aggregate surplus impact for securities reclassified off Schedule D-1. This shall include the difference between book adjusted carrying value as of December 31, 2024, and book adjusted carrying value after transition for those securities that moved from an amortized cost to a fair value measurement method under the lower of amortized cost or fair value approach.				

#### M. Cash & Short-term Investments

☐

1. Have the following been disclosed with respect to short-term investments: [SSAP No. 2 par. 18]

a. Basis at which the short-term investments are stated?				
b. Fair values in accordance with SSAP No. 100 —Fair Value? (See <a href="#">Fair Value of Financial Instruments</a> )				
c. Concentrations of credit risk in accordance with SSAP No. 27 —Off-Balance-Sheet and Credit Risk Disclosures? (See <a href="#">Financial Instruments with Concentrations of Credit Risk</a> )				
d. The items in the scope of this statement are also subject to the annual audited disclosures in SSAP No. 26-Bonds, paragraph 40.f.				
e. Identification of cash equivalents (excluding money market mutual funds) and short-term investments (or substantially similar investments), which remain on the same reporting schedule for more than one consecutive reporting period. This disclosure is satisfied by use of a designated code in the investment schedules of the statutory financial statements.				

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	Yes	No	N/A	Comments
2. Has the reporting entity's share of the cash pool by asset type (cash, cash equivalents or short-term investments) been disclosed? [SSAP No. 2 par. 19]				
3. Are derivative instruments appropriately segregated from cash equivalents and short-term investments, regardless of maturity: [SSAP No. 2 par. 6 and par. 14]				

#### N. Working Capital Finance Investments

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1. Have the following been disclosed with respect to working capital finance investments: [SSAP No. 105 par 30]

- Fair value in accordance with SSAP No. 100? (See [Fair Value of Financial Instruments](#))
- Concentrations of credit risk in accordance with SSAP No. 27? (See [Financial Instruments with Concentrations of Credit Risk](#))
- Information regarding the aggregate book/adjusted carrying value of working capital finance investment by designation including gross assets with nonadmitted and net admitted amounts annually?  
**Note:** programs with an NAIC designation 3-6 are nonadmitted
- Annual and quarterly information regarding the aggregate book/adjusted carrying value maturity distribution on the underlying working capital finance investments by the categories of maturities up to 180 days and 181 to 365 days?
- Any events of default of working capital finance investments during the reporting period?


#### O. Insurance-Linked Securities

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- |   | Yes | No | N/A | Comments |
|---|-----|----|-----|----------|
| 1. Has the reporting entity disclosed information regarding when they may receive possible proceeds as the issuer, ceding insurer, or counterparty of insurance-linked securities? Insurance-linked securities (ILS) are securities whose performance is linked to the possible occurrence of pre-specified events that relate to insurance risks. While catastrophe bonds (cat bonds) may be the most well-known type of ILS, there are other non-cat-bond ILS, including those based on mortality rates, longevity and medical-claim costs. ILS securities may be used by an insurer, or any other risk-bearing entity, in addition to (or as an alternative to) the purchase of insurance or reinsurance. This disclosure should specifically identify the following: [SSAP No. 1 par. 25] |     |    |     |          |

- a. Whether the reporting entity may receive possible proceeds as the issuer, ceding insurer or counterparty of insurance-linked securities as a way of managing risks related to directly-written insurance risks. This disclosure shall include the number of outstanding ILS contracts, and the aggregate maximum proceeds that could be received as of the reporting date under the terms of the ILS.
- b. Whether the reporting entity may receive possible proceeds as the issuer, ceding insurer, or counterparty of insurance-linked securities as a way of managing risk related to assumed insurance risks. This disclosure shall include the number of outstanding ILS contracts, and the aggregate maximum proceeds that could be received as of the reporting date under the terms of the ILS.


**P. Reinsurance Recoverable**

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1. Have the following been disclosed with regard to unsecured reinsurance recoverables: [SSAP No. 62 par. 106]

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	Yes	No	N/A	Comments
a. If the company has with any individual reinsurers, authorized, reciprocal jurisdiction, unauthorized, or certified an unsecured aggregate recoverable for losses, paid and unpaid including IBNR, loss of adjustment expenses, and unearned premium that exceeds 3% of the company's policyholder surplus, has each individual reinsurer been disclosed together with the unsecured aggregate recoverable pertaining to that reinsurer?				
b. If the individual reinsurer is part of a group, have the individual reinsurers been disclosed, together with each of its related group members having reinsurance with the reporting company, and the total unsecured aggregate recoverables for the entire group?				
2. Has reinsurance recoverable on paid and unpaid losses in dispute (including IBNR) by reason of notification, arbitration or litigation been identified if the amounts in dispute from any company (and/or affiliate) exceed 5% of the ceding company's policyholders surplus or if the aggregate of all disputed items exceeds 10% of the ceding company's policyholders surplus? [SSAP No. 62 par. 107] <b>Note:</b> "Notification" means a formal written communication from are insurer denying the validity of coverage.				
3. For uncollectible reinsurance written off during the year have the amounts together with the name or names of the reinsurer(s) been disclosed according to the following annual statement classifications: [SSAP No. 62 par. 108]				
a. Losses incurred?				
b. Loss adjustment expenses incurred?				
c. Premiums earned?				
d. Other?				
4. Has any commutation of ceded reinsurance during the year reported in the following classifications been disclosed, including the name or names of the reinsurer(s): [SSAP No. 62 par. 109]				



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	Yes	No	N/A	Comments
a. Losses incurred?				
b. Loss adjustment expenses incurred?				
c. Premiums earned?				
d. Other?				
5. Has the following information been provided for all retroactive reinsurance agreements that transfer liabilities for losses that have already occurred and that will generate special surplus transactions: [SSAP No. 62 par. 110] <b>Note:</b> Do not report transactions utilizing deposit accounting in this note.				
a. Reserves transferred?				
b. Consideration paid or received?				
c. Paid losses reimbursed or recovered?				
d. Special surplus from retroactive reinsurance?				
e. A list of all cedents and reinsurers included in items a. through d. showing the assumed and ceded amounts?				
f. List the total Paid Loss/LAE amounts recoverable (for authorized, reciprocal jurisdiction, unauthorized and certified reinsurers), any amounts more than 90 days overdue (for authorized, reciprocal jurisdiction, unauthorized and certified reinsurers) and for amounts recoverable the collateral held (for unauthorized and certified reinsurers).				
6. Has the maximum amount of return commission which would have been due reinsurers if all reinsurance were cancelled with the return of the unearned premium reserve been disclosed? [SSAP No. 62 par. 111a] <b>Note:</b> Equity amounts should be computed by applying the fixed or provisional commission rate for each contract to the unearned premium reserve.				

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	Yes	No	N/A	Comments
7. Has the additional or return commission, predicated on loss experience or on any other form of profit sharing arrangements in this annual statement as a result of existing contractual arrangements been disclosed? [SSAP No. 62 par. 111b]				
8. Have the following been disclosed with regard to the transfer of property and casualty run-off agreements: [SSAP 62 par. 120]				
a. The fact that the reporting entity has entered into agreements which have been approved the domiciliary regulator and have qualified pursuant to paragraphs 36.e of SSAP 62 (also see paragraphs 102-105)?				
b. A description of the agreement and the amount of consideration paid and liabilities transferred?				
9. Have the following been disclosed with regard to reinsurance agreements which qualify for reinsurance aggregation in accordance with paragraphs 87-89 of SSAP 62: [SSAP 62 par. 121]				
a. A description of the significant terms of the reinsurance agreement, including established limits and collateral?				
b. The amount of unexhausted limit as of the reporting date?				
c. To the extent that the domestic state insurance department approves the use of the retroactive contract as an acceptable form of security related to the original reinsurers under the applicable provisions of the state's credit for reinsurance law, the use of such discretion shall be disclosed in the annual statement Note 1 as a prescribed or permitted practice. In addition, Note 1 shall disclose as part of the total impact on the provision for reinsurance the impact on the overdue aspects of the calculation if the reporting entity also receives commissioner approval pursuant to paragraph 87 related to overdue paid amounts (both authorized and unauthorized).				
10. For reinsurance agreements that have been accounted for as deposits, have the following been disclosed: [SSAP No. 62 par. 122]				

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	Yes	No	N/A	Comments
a. A description of the reinsurance agreements?				
b. Any adjustment of the amounts initially recognized for expected recoveries? <b>Note:</b> The individual components (e.g. interest accrual, change due to changes in estimates of cash flows) should be disclosed separately.				
11. If the rating of a certified reinsurer has been downgraded or its certified reinsurer status is subject to revocation and additional collateral has not been received as of the filing date, has the following been disclosed: [SSAP No. 62 par. 123]				
a. The name of certified reinsurer downgraded or subject to revocation of certified reinsurer status and relationship to the reporting entity?				
b. Date of downgrade or revocation and jurisdiction of action?				
c. Collateral percentage requirements pre and post downgrade or revocation?				
d. Net ceded recoverable subject to collateral?				
e. The actual or estimated impact of the collateral deficiency on the provision for reinsurance?				
12. If the reporting entity is a certified reinsurer, do the financial statements disclose the impact on any reporting period in which its certified reinsurer rating is downgraded or status as a certified reinsurer is subject to revocation? [SSAP No. 62 par. 124]				

**Q. Fixed Assets**

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1. Have the following been disclosed with respect to EDP equipment and operating and nonoperating system software: [SSAP No. 16 par. 17]

- a. Depreciation and amortization expense for the period?
- b. For EDP equipment and operating system software, balances of major classes of depreciable assets, by nature or function, at the balance sheet date?


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	Yes	No	N/A	Comments
c. For EDP equipment and operating systems software, accumulated depreciation and amortization, either by major classes of depreciable assets or in total, at the balance sheet date?				
d. A general description of the method or methods used in computing depreciation with respect to major classes in of depreciable assets?				
2. For Furniture, Fixtures and Equipment (excluding electronic data processing equipment) and Leasehold Improvements Paid by the Insurer as Lessee, have the following been disclosed: [SSAP No. 19 par. 15]				
a. Depreciation and amortization expense for the period?				
b. A general description of the method or methods used in computing depreciation and amortization with respect to major classes of depreciable assets or leasehold improvements?				
3. Have any changes in the written capitalization policy and the resultant predefined thresholds from the prior period and the reason(s) for such change(s) been disclosed? [SSAP No. 4, par.8, SSAP No. 16 par. 18, SSAP No. 19 par. 16 and SSAP No. 29 par. 4, SSAP No. 73 par. 11]				
<b>R. Preoperating and Research and Development Costs</b>				
1. Has the total amount of research and development costs charged to expense been disclosed for each period for which an income statement is presented? [SSAP 17 par. 5]				
<b>S. Supplemental Information required by the NAIC Accounting Practices and Procedures Manual</b>				
1. Do disclosures include the information about the entities investments required by Appendix A-001, Investments of Reporting Entities, to the NAIC Accounting Practices and Procedures manual? [SSAP No. 1 par. 26]				

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	Yes	No	N/A	Comments
2. Do disclosures include the information required by paragraphs 114 through 119 of SSAP No. 62 Property and Casualty Reinsurance? [SSAP 62 par. 113]				
3. Do disclosures include the schedule of selected financial data as required by the Life, Accident and Health and Fraternal Annual Statement Instructions? [SSAP No. 1 par. 27]				
4. Do disclosures include the information required by paragraphs 79 through 84 of SSAP No. 61 Life, Deposit-Type and Accident and Health Reinsurance? [SSAP No. 61 par. 78]				

### Liabilities and Surplus

#### A. Unpaid Claims, Losses and Loss Adjustment Expenses

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1. Have the following been disclosed for each year financial statements are presented: [SSAP No. 55 par. 17]  
**Note:** Life and annuity contracts are not subject to this disclosure requirement.
  - a. The balance in the liabilities for unpaid claims and unpaid losses and loss/claim adjustment expense reserves at the beginning and end of each year presented?
  - b. Incurred claims, losses and loss/claim adjustment expenses with separate disclosure of the provision for insured or covered events of the current year and increases or decreases in the provision for insured or covered events of prior years?
  - c. Payments of claims, losses and loss/claim adjustment expenses with separate disclosures of payments of losses and loss/claim adjustment expenses attributable to insured or covered events of the current year and insured or covered events of prior years?


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	Yes	No	N/A	Comments
d. A description of the reasons for changes in the provision for incurred loss and loss adjustment expenses attributable to insured events of prior years? <b>Note:</b> The disclosure should indicate whether additional premiums or return premiums have been accrued as a result of the prior-year effects. Note: This is also applicable to interim financial statements if there is a material change from the amounts reported in the annual filing.				
e. Information about significant changes in methodologies and assumptions used in calculating the liability for unpaid claims and claim adjustment expenses, including reasons for the change and the effects on the financial statements for the most recent reporting period presented.				
f. A summary of management's policies and methodologies for estimating the liabilities for losses and loss/claim adjustment expenses, including discussion of claims for toxic waste cleanup, asbestos-related illnesses, or other environmental remediation exposures?				
g. The amount paid and reserved for losses and loss/claim adjustment expenses for asbestos and/or environmental claims, on a direct, assumed and net of reinsurance basis? <b>Note:</b> The reserves required to be disclosed in this section shall exclude amounts relating to policies specifically written to cover asbestos and environmental exposures. Each company should report only its share of a group amount (after applying its respective pooling percentage) if the company is a member of an intercompany pooling agreement.				
h. Estimates of anticipated salvage and subrogation (including amounts recoverable from second injury funds, other governmental agencies, or quasi-governmental agencies, where applicable), deducted from the liability for unpaid claims, losses or their associated adjusting expenses?				

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	Yes	No	N/A	Comments
2. Has the dollar amount of any claims/losses related to extra contractual obligation lawsuits or bad faith lawsuits paid during the reporting period on a direct basis been disclosed? The number of such claims paid shall be disclosed in a note. [SSAP No. 55 par. 18]				

**B. Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses**

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1. Do the financial statements state whether or not any of the liabilities for unpaid losses or unpaid loss adjustment expenses are discounted, including liabilities for Workers' Compensation? [SSAP No. 65 par. 14]				
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2. Has the following information been furnished for each line of business affected: [SSAP No. 65 par.14]

a. Identification of table used?

b. Rate(s) used to discount?

c. The amount of discounted liability reported in the financial statements?

d. The amount of tabular discount, disclosed by line of business and reserve category (i.e., case and IBNR)?

e. The amount of interest accretion recognized in the statement of income;

f. The line item(s) in the statement of income in which the interest accretion is classified.


3. If the rate(s) used to discount prior accident years' liabilities have changed from the prior annual statement or if there have been changes in other key discount assumptions such as payout patterns, do the financial statements disclose: [SSAP No. 65 par. 15]

a. Amount of discounted current liabilities at current rate(s) assumption(s)?

**Note:** Exclude the current accident year.

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	Yes	No	N/A	Comments
b. Amount of discounted current liabilities at previous rate(s) assumption(s)? <b>Note:</b> Exclude the current accident year.				
c. Change in discounted liability due to change in interest rate(s) assumption (s)?				
d. Amount of non-tabular discount, disclosed by line of business and reserve category (i.e., case, defense and cost containment, adjusting and other)?				

### C. Income Taxes

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1. Have the following been disclosed with respect to deferred taxes: [SSAP No. 101 par. 22]

a. The total of all Deferred Tax Assets (DTAs) (gross, adjusted gross, admitted and nonadmitted) by tax character?				
b. The total of all Deferred Tax Liabilities (DTLs) by tax character?				
c. The total DTAs non-admitted as the result of the application of paragraph 11 of SSAP No. 101?				
d. The net change during the year in the total DTAs non-admitted?				
e. The amount of each result or component of the calculation, by tax character of paragraphs 11.a., 11.b.i., 11.b.ii., 11.c., and the ExDTA ACL RBC Ratio, the ExDTA Surplus plus Contingency Reserves/Required Aggregate Risk Capital Ratio, or the Adjusted Gross DTA/Adjusted Capital and Surplus Ratio used in the applicable Realization Threshold Limitation Table (the RBC Reporting Entity Table, the Financial Guaranty or Mortgage Guaranty Non-RBC Reporting Entity Table, or the Other Non-RBC Reporting Entity Table) in paragraph 11.b., as applicable?				



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	Yes	No	N/A	Comments
f. The impact of tax-planning strategies on the determination of adjusted gross DTAs and the determination of net admitted DTAs, by percentage and by tax character, and whether the tax-planning strategies include the use of reinsurance-related tax planning strategies.				
2. To the extent that DTLs are not recognized for amounts described in paragraph 31 of FAS109 <sup>1</sup> , have the following been disclosed: [SSAP No. 101 par. 23]				
a. A description of the types of temporary differences for which a DTL has not been recognized and the types of events that would cause those temporary differences to become taxable?				
b. The amount of the unrecognized DTL for temporary differences related to investments in foreign subsidiaries and foreign corporate joint ventures that are essentially permanent in duration, if determination of that liability is practicable, or a statement that determination is not practicable?				

<sup>1</sup> According to paragraph 31 of FAS 109 A deferred tax liability is not recognized for the following types of temporary differences unless it becomes apparent that those temporary differences will reverse in the foreseeable future:

- An excess of the amount for financial reporting over the tax basis of an investment in a foreign subsidiary or a foreign corporate joint venture as defined in APB Opinion No. 18, *The Equity Method of Accounting for Investments in Common Stock*, that is essentially permanent in duration.
- Undistributed earnings of a domestic subsidiary or a domestic corporate joint venture that is essentially permanent in duration that arose in fiscal years beginning on or before December 15, 1992
- "Bad debt reserves" for tax purposes of U.S. savings and loan associations (and other "qualified" thrift lenders) that arose in tax years beginning before December 31, 1987 (that is, the base-year amount).
- "Policyholders' surplus" of stock life insurance companies that arose in fiscal years beginning on or before December 15, 1992.

The indefinite reversal criterion in Opinion 23 shall not be applied to analogous types of temporary differences.

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	Yes	No	N/A	Comments
c. The amount of the DTL for temporary differences other than those in item b. above that is not recognized in accordance with the provisions of paragraphs 31 of FAS 109?				
3. Have significant components of income taxes incurred (i.e. current income tax expense) and the changes in DTAs and DTLs, been disclosed; for example: [SSAP No. 101 par. 24]				
a. Current tax expense or benefit?				
b. The change in DTAs and DTLs (exclusive of the effects of other components listed below)?				
c. Investment tax credits?				
d. The benefits of operating loss carry forwards?				
e. Adjustments of DTA's or DTL's for enacted changes in tax laws or rates or a change in the tax status of the reporting entity?				
f. Adjustments to gross deferred tax assets because of a change in circumstances that causes a change in judgment about the realizability of the related deferred tax asset, and the reason for the adjustment and change in judgment?				
4. To the extent that the sum of a reporting entity's income taxes incurred and the change in its DTAs and DTLs is different from the result obtained by applying the federal statutory rate to its pretax net income, has the reporting entity disclosed the nature of the significant reconciling items? [SSAP No. 101 par. 25]				
5. Has the reporting entity disclosed the following: [SSAP No. 101 par. 26]				
a. The amounts, origination dates and expiration dates of operating loss and tax credit carry forwards available for tax purposes?				
b. The amount of federal income taxes incurred in the current year and each preceding year that are available for recoupment in the event of future net losses?				

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	Yes	No	N/A	Comments
c. The aggregate amount of deposits admitted under Section 6603 of the Internal Revenue Service Code.				
6. For any federal or foreign income tax loss contingencies as determined in accordance with paragraph 3.a. for which it is reasonably possible that the total liability will significantly increase within 12 months of the reporting date, has the company disclosed an estimate of the range of the reasonably possible increase or a statement that an estimate of the range cannot be made? [SSAP No. 101 par. 27]				
7. If the company's federal income tax return is consolidated with those of any other entity or entities, have the following been provided: [SSAP No. 101 par. 28]				
a. A list of names of the entities with which the company's federal income tax return is consolidated for the current year?				
b. The substance of the written agreement, approved by the company's Board of Directors, that sets forth the manner in which the total combined federal income tax for all entities is allocated to each entity that is a party to the consolidation. (If no written agreement has been executed, explain why such an agreement has not been executed). Additionally, does the disclosure include the manner in which the entity has an enforceable right to recoup federal income taxes in the event of future net losses which it may incur or to recoup its net losses carried forward as an offset to future net income subject to federal income taxes?				

**Note:** The following disclosures are additional elements under the Tax Cuts and Jobs Act (INT 18-03)

**Repatriation Transition Tax (RTT)**

8. Has the Repatriation Transition Tax owed under the Tax Cuts and Jobs Act been disclosed?				
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	Yes	No	N/A	Comments
<p>9. Has the schedule of payments made and expected future payments to satisfy the RTT Liability been disclosed?</p> <p><b>Note:</b> This disclosure shall explicitly identify whether the insurance entity has remitted full payment of the RTT, or whether the reporting entity is electing to pay the liability under the permitted installments. If the reporting entity fully remitted the RTT, disclosure of the RTT and the remitted payment is only required in the year-end 2018 financial statements. Reporting entities electing to make installment payments shall include the disclosure beginning in the year-end 2018 financial statements and continuing through the year-end statutory financial statements for the year in which the last instalment payment was remitted.</p>				

**Alternative Minimum Tax (AMT) Credit**

10. Has the following been disclosed with regards to the AMT Credit:

- a. Gross AMT Credit Recognized as:
  - i. Current year recoverable
  - ii. Deferred tax asset (DTA)
- b. Beginning Balance of AMT Credit Carryforward
- c. Amounts recovered
- d. Adjustments
- e. Ending Balance of AMT Credit Carryforward
- f. Reductions for Sequestration
- g. Nonadmitted by Reporting Entity
- h. Reporting Entity Ending Balance


**Note:** The disclosure for Nonadmitted by Reporting Entity (item g) intends to capture any nonadmittance of the AMT Tax Credit by the reporting entity prior to application of the DTA admittance limitations reflected in SSAP No. 101. The Reporting Entity Ending Balance (item h) reflects the amount of AMT Credit recognized by the reporting entity. This amount may be further reduced by DTA admittance limitations required in SSAP No. 101.

**Global Intangible Low-Taxed Income Tax**

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	Yes	No	N/A	Comments
11. For reporting entities that recognize deferred tax items for GILTI, were these items explicitly disclosed in Note 9?				

**Note:** Inflation Reduction Act – Corporate Alternative Minimum Tax (INT 23-03)

**CAMT**

1. Did the reporting entity disclose whether it is:
  - a. a nonapplicable reporting entity
  - b. an applicable reporting entity with tax allocation agreement exclusions
  - c. an applicable reporting entity


2. For applicable reporting entities (which do not have tax allocation agreement exclusions in accordance with paragraph 11 of this interpretation) has the following been disclosed?

- a. If the reporting entity has made an accounting policy election to either consider or disregard CAMT when evaluating the need for a valuation allowance for its non-CAMT DTAs described in paragraph 22 of this interpretation?
- b. Any disclosure of material modifications to the methodology used to project CAMT as required by paragraph 35 of this interpretation.


3. Are relevant disclosures required by SSAP No. 101 followed, including (but not limited to):

- a. The disclosure of the statutory valuation allowance as required by SSAP No. 101, paragraph 21?
- b. The disclosure of tax planning strategies is required by SSAP No. 101. In the disclosure required by SSAP No. 101, paragraph 28.b., is there a statement as to whether the reporting entity may be charged with a portion of CAMT incurred by the consolidated group (or credited with a portion of the consolidated group's CAMT credit utilization)?
- c. Inclusion of CAMT credit DTAs, if any, in the disclosure required by SSAP No. 101, paragraph 26.a. regarding the origination dates and expiration of tax credit carry forwards?
- d. The impact of CAMT planning strategies, if any, in the disclosure required by SSAP No. 101, paragraph 22.f?


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**D. Debt Other than Surplus Notes and Capital Notes**

Yes      No      N/A      Comments

1. Have the following been disclosed with respect to debt, including FHLB borrowings accounted for under SSAP not. 15: [SSAP No. 15 par. 20]

- a. Date issued?
- b. Pertinent information concerning the kind of borrowing (e.g., debentures, commercial paper outstanding, bank loans, and lines of credit)?
- c. Face amount of the debt?
- d. Carrying value of debt?
- e. The rate at which interest accrues?
- f. The effective interest rate?
- g. Collateral requirements?
- h. Interest paid in the current year?
- i. A summary of significant debt terms and covenants and any violations?
- j. The combined aggregate amount of maturities and sinking fund requirements for each of the five years following the latest balance sheet presented?
- k. If debt was considered to be extinguished by in-substance defeasance prior to January 1, 2001 and any of the debt remains outstanding, a general description of the transaction and the amount of debt that is considered extinguished at the end of the period?
- l. If assets are set aside after January 1, 2001 solely for satisfying scheduled payments of a specific obligation, a description of the nature of restrictions placed on those assets?


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	Yes	No	N/A	Comments
2. Has the reporting entity disclosed its share incurred and the allocation methodology from the parent or holding company relating to obligations of the holding company for which there is no legal obligation on the part of the reporting entity? [SSAP No. 15 par. 16]				
3. If a reporting entity guarantees an obligation of the holding company, has the reporting entity disclosed the guarantee in accordance with SSAP No. 5. (See Guarantees) [SSAP No. 15 par. 17]				
4. For FHLB borrowings accounted for under SSAP No. 15, has the entity made the disclosures required by SSAP No. 30? [SSAP No. 15 par. 21] (See <a href="#">Investments – Common Stock</a> )				
5. For unused commitments and lines of credit, has the reporting entity separately disclosed the following, disaggregated by short-term and long term, in the notes to financial statements [SSAP No. 15 par. 22]:				
a. The amount and terms of unused commitments for financing arrangements (including commitment fees and the conditions under which commitments may be withdrawn)				
b. The amount and terms of unused lines of credit for financing arrangements (including commitment fees and the conditions under which lines may be withdrawn) and the amount of those lines of credit that support commercial paper borrowing arrangements or similar arrangements.				

**E. Capital and Surplus, Shareholders' Dividend Restrictions and Quasi-Reorganizations**

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1. Have the following been disclosed: [SSAP No. 72 par. 22]				
a. The number of shares of each class of capital stock authorized, issued and outstanding as of the balance sheet date and the par value or stated value of each class?				
b. The dividend rate, liquidation value and redemption schedule (including prices and dates) of any preferred stock issues?				

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c. Dividend restrictions, if any, and an indication if the dividends are cumulative?				
d. The dates and amounts of dividends or distributions paid? <b>Note:</b> for each payment disclose whether the dividend or distribution was ordinary or extraordinary.				
e. The portion of the reporting entity's profits that may be paid as ordinary dividends to stockholders?				
f. A description of any restrictions placed on the unassigned funds (surplus), including for whom the surplus is being held?				
g. For mutual reciprocals, and similarly organized entities, the total amount of advances to surplus not repaid, if any?				
h. The total amount of stock held by the company, including stock of affiliated companies, for special purposes such as conversion of preferred stock, employee stock options, and stock purchase warrants?				
i. A description of the reasons for changes in the balances of any special surplus funds from prior period?				
j. The portion of unassigned funds (surplus) represented or reduced by each of the following items:				
1) Unrealized gains and losses?				
2) Nonadmitted asset values?				
3) Separate account business?				
4) Asset valuation reserves?				
5) Provisions for reinsurance?				
k. For reciprocal insurance companies only:				
1) The amount of surplus identified as subscriber savings accounts?				



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	Yes	No	N/A	Comments
2) The source of the funds (either from the reciprocal's operations or contributed by the individual subscriber) and, the reporting location of surplus?				
3) The conditions upon which the balances are paid to the subscribers?				
l. The impact of the restatement in a quasi-reorganization as long as financial statements for the period of the reorganization are presented?				
m. The effective date of a quasi-reorganization for a period of ten years following the reorganization?				
2. Have the following been disclosed for all surplus notes that are outstanding: [SSAP No. 41 par. 18]				
a. Date issued?				
b. Description and fair value of the assets received?				
c. Holder of the note or, if public, the names of the underwriter and trustee, with identification on whether the holder of the surplus note is a related party per SSAP No. 25?				
d. Original issue amount of note?				
e. Carrying value of note?				
f. The rate at which interest accrues?				
g. Maturity dates or repayment schedules, if stated?				
h. Unapproved interest and/or principal?				
i. Life-to-date and current year approved interest and principal recognized:				

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6) Percentage interest payments offset through 'administrative offsetting' (not inclusive of amounts paid to a third-party party liquidity provider). For example, if \$100 in interest was recognized through the year, \$10 of which was remitted to a third-party liquidity provider and the remainder \$90 was offset, the reporting entity shall report 100% as offset.				
j. Disclosure of whether the surplus note was issued as part of a transaction with any of the following attributes:				
1) Do surplus note/associated asset terms negate or reduce cash flow exchanges, and/or are amounts payable under surplus note and amounts receivable under other agreements contractually linked? (For example, the asset provides interest payments only when the surplus note provides interest payments.)				
2) Are any amounts due under surplus notes and associated assets netted or offset (partially or in full) thus eliminating or reducing the exchange of cash or assets that would normally occur throughout the duration, or at maturity, of the agreement? (This may be referred to as administrative offsetting.)				
3) Were the proceeds from the issuance of a surplus note used to purchase an asset directly or indirectly from the holder of the surplus note?				
k. Principal amount and fair value of assets received upon surplus note issuance, if applicable?				
l. Subordination terms?				
m. Liquidation preference to the insurer's command preferred shareholders?				
n. The repayment conditions and restrictions?				

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o. Information about any guarantees, support agreements, or related party transactions associated with the surplus note issuance, and whether payments have been made under such agreements?				
3. If a reporting entity has ceded business to a surplus note issuer that is a related party as part of a reinsurance transaction in which the surplus note meets any of the criteria in paragraph 2.j above., the ceding entity shall provide a description of the transaction, including whether the criteria in paragraph 2.j. above were met with respect to the surplus note issuance, as long as the reinsurance agreement remains in force. The ceding entity should provide a description of the risks reinsured, the related party reinsurer, any guarantees or support agreements and the amount of notes outstanding. [SSAP No. 41 par. 19]				
4. If the proceeds from the issuance of a surplus note used to purchase an asset directly or indirectly from the holder of the surplus note, the following information shall be disclosed regarding the assets received: [SSAP No. 41 par. 20]				
a. Identification of asset, including the investment schedule where the asset is reported and reported NAIC designation.				
b. Book/ adjusted carrying value of asset as of the current reporting date.				
c. A description of terms under which liquidity would be provided should a triggering event occur.				
5. Has the insurer identified all affiliates that hold any portion of a surplus debenture or similar obligation (including an offering registered under the Securities Act of 1933 or distributed pursuant to Rule 144A under the Securities Act of 1933), and any holder of 10% or more of the outstanding amount of any surplus note registered under the Securities Act of 1933 or distributed pursuant to Rule 144A under the Securities Act of 1933? [SSAP No. 41 par. 21]				

## INCOME STATEMENTS

### A. Property Casualty Contracts – Premiums

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	No	N/A	Comments
1. If a premium deficiency reserve is established, has the amount of that reserve been disclosed? [SSAP No. 53 par. 17]			
2. If a reporting entity utilizes anticipated investment income as a factor in the premium deficiency calculation, has the reporting entity's disclosed such fact whether a reserve is recorded or not? [SSAP No. 53 par. 18]			

## B. Managing General Agents

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1. Have the aggregate amount of direct premiums written through managing general agents or third party administrators been disclosed? [SSAP No. 53 par. 19 (P & C Contracts – Premiums); SSAP No. 51 par. 51 (Life Contracts); SSAP No. 54 par 33 (Accident & Health)] <b>Note:</b> For purposes of this instruction, a managing general agent means the same as referenced Appendix A-225 of the NAIC Manual.			
2. If the amount of direct premiums written through managing general agents is equal or greater than 5% of surplus, has the following been disclosed for each managing general agent and third party administrator: [SSAP No. 53 par. 19 (P&C Contracts – Premiums); SSAP No. 51, par. 51 (Life Contracts) ; SSAP No. 54 par. 33 (Accident & Health)]			
a. Name and address of managing general agent or third party administrator?			
b. Federal Employer Identification Number? <b>Note:</b> If this information has been disclosed in the annual statement, the NAIC does not object to not disclosing this ID number in the audited financial statements.			
c. Whether such person holds an exclusive contract?			
d. Types of business written?			
e. Type of authority granted (i.e., underwriting, claims payment, etc)?			

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f. Total premium written?				

**C. Investment Income**

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1. Has the following been disclosed with respect to investment income: [SSAP No. 34 par. 7]

a. The bases, by category of investment income, for excluding (nonadmitting) any investment income due and accrued?				
b. The total amount of investment income excluded?				
c. The gross, nonadmitted and admitted amounts for interest income due and accrued?				
d. Aggregate deferred interest?				
d. Cumulative amounts of paid-in-kind (PIK) interest included in the current principal balance/par value?				

**D. Capitalization of Interest**

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1. Have the following disclosures been made in accordance with paragraph 21 of FAS 34? [SSAP No. 44 par. 8]

a. For an accounting period in which no interest cost is capitalized, the amount of interest cost incurred and charged to expense during the period.				
b. For an accounting period in which some interest cost is capitalized, the total amount of interest cost incurred during the period and the amount thereof that has been capitalized.				

**E. Unusual or Infrequently Occurring Items**

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1. Have material events or transactions that the entity considers to be of an unusual nature or of a type that indicates infrequency of occurrence or both been reported consistently with reporting entity's reporting of continuing operation (i.e., no separate line item presentation in the balance sheet or statement of operations)? [SSAP No. 24 par. 9]				
2. The nature, including a general description of the transactions, and financial effects of each unusual or infrequent event or transaction shall be disclosed in the notes to the financial statements. Gains or losses of a similar nature that are not individually material shall be aggregated. This disclosure shall include the line items which have been affected by the event or transaction considered to be unusual and/or infrequent.  <b>Note:</b> If the unusual or infrequent item is as the result of government assistance (as defined in ASU 2021-10, Government Assistance, Disclosures by Business Entities about Government Assistance) disclosure shall additionally include the form in which the assistance has been received (for example, cash or other assets), and information regarding significant terms and conditions of the transaction, with items including, to the extent applicable, the duration or period of the agreement, and commitments made by the reporting entity, provisions for recapture, or other contingencies. [SSAP No. 24 par. 16]				

## STATEMENT OF CASH FLOW

1. Has the cash flow statement been prepared using the direct method? [SSAP No. 69 par. 2]				
2. Are transactions considered to be operating, investing, and financing activities (consistent with the classifications in the Annual Statement) that affect recognized assets or liabilities but do not result in cash receipts or cash payments in the period disclosed in narrative or schedule form? [SSAP No. 69 par. 3a]				

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3. Are the cash and noncash aspects of the above transactions as operating, investing, or financing consistent with the classifications provided by the Annual Statement Instructions? Examples of noncash operating, investing, and financing transactions include: [SSAP No. 69 par. 3b]				
a. Receiving non-cash financial assets from parent as capital contributions?				
b. Settling reinsurance transactions with exchange of non-cash financial assets?				
c. Converting debt to equity?				
d. Acquiring assets by assuming directly related liabilities, such as purchasing a building by incurring a mortgage to the seller?				
e. Exchanging noncash assets or liabilities or other noncash assets or liabilities?				

## GENERAL FINANCIAL STATEMENT DISCLOSURES

### A. Nature of Operations

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1. Is a description of the nature of operations of the reporting company, including the following, presented as an integral part of the financial statements: [SSAP No. 1 par. 10]

- a. Summary of the ownership relationships of the reporting entity and all affiliated companies?
- b. Description of major products and/or services?
- c. Principal markets including location of those markets?
- d. If the entity operates in more than one business, the relative importance of its operations in each business and the basis for that determination (e.g., based on assets, revenues, or earnings)?


### B. Use of Estimates

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1. Has the fact that preparation of financial statements in conformity with the Annual Statement Instructions and the Accounting Practices and Procedures Manual requires the use of management's estimates been disclosed? [SAP 1 par. 11]				

### C. Summary of Significant Accounting Policies

1. Have disclosures of accounting policies been made in a separate Summary of Significant Accounting Policies as the initial note to the notes to the financial statements? [SSAP No. 1 par. 6]				
2. Have all accounting policies that materially affect the assets, liabilities, capital and surplus or results of operations been disclosed, including the following: [SSAP No. 1 par. 5]				
a. Basis at which the short-term investments are stated?				
b. The basis at which bonds, common stocks, preferred stocks, mortgage loans and derivatives are stated (see specifics in those sections above)?				
c. The accounting policies of the insurer with respect to investments in these subsidiaries, controlled and affiliated companies?				
d. The accounting policies of the insurer with respect to investments in these joint ventures, partnerships and limited liability companies?				
e. A description of the accounting policy for derivatives?				
f. Whether or not the reporting entity utilizes anticipated investment income as a factor in the premium deficiency reserve calculation? <b>Note:</b> Also disclose the amount of any PDR recorded.				
g. Whether the written asset capitalization policy and predefined thresholds have changed from the prior period and the reason for such change? [SSAP No. 4 par. 8]				



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3. If a reporting entity employs an accounting practice that departs from the NAIC Accounting Practices and Procedures manual either through use of (1) a state prescribed practice, or (2) a practice permitted by the state of domicile, has the following information about those accounting practices that affect statutory surplus or risk-based capital, or (3) any accounting practices and procedures that result in different statutory accounting reporting (e.g. gross or net presentation, financial statement reporting lines, etc. been disclosed?: [SSAP No. 1 par. 7]				
a. A description of the accounting practice?				
b. A statement that the accounting practice differs from NAIC statutory accounting practices and procedures?				
c. The monetary effect on net income and statutory surplus of using an accounting practice which differs from NAIC statutory accounting practices and procedures?				
d. If an insurance enterprise's risk based capital would have triggered a regulatory event had it not used a permitted practice, has that fact been disclosed in the financial statements?				
4. When NAIC statutory accounting practices and procedures do not address the accounting for the transaction, have the following been disclosed about accounting practices: [SSAP No. 1 par. 8]				
a. A description of the transaction and of the accounting practice used?				
b. A statement that the NAIC statutory accounting practices and procedures do not address the accounting for the transaction?				
<b>D. Transactions with Affiliates and Other Related Parties</b>				

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- |   | Yes | No | N/A | Comments |
|---|-----|----|-----|----------|
| 1. Do the financial statements include disclosures of all material related party transactions, including transactions with the ownership interests identified in SSAP No. 25 par. 24: [SSAP No. 25 par. 23] |     |    |     |          |

**Note:** Disclosure is required for all owners with greater than 10% ownership of the reporting entity. In some cases, aggregation of similar transactions, that on a stand-alone basis are not material, may be appropriate.

a. The nature of the relationship involved?

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b. A description of the transactions of each of the periods for which financial statements are presented, and such other information considered necessary to obtain an understanding of the effects of the transaction on the financial statements?

**Note:** Exclude reinsurance transactions, any non-insurance transactions that are less than ½ of 1% of the total admitted assets of the reporting entity, and cost allocation transactions. The following information shall be provided if applicable:

- 1) Date of transaction?
- 2) Explanation of transaction?
- 3) Name of reporting entity?
- 4) Name of affiliate?
- 5) Description of assets received by reporting entity?
- 6) Statement value of assets received by reporting entity?
- 7) Description of assets transferred by reporting entity?
- 8) Statement value of assets transferred by reporting entity?


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c. Have the dollar amounts of transactions for each of the periods for which financial statements are presented and the effects of any change in the method of establishing the terms from that used in the preceding period been disclosed?				
d. Have amounts due from or related parties as of the date of each balance sheet presented and, if not otherwise apparent, the terms and manner of settlement been disclosed?				
e. Have all guarantees or undertakings, written or otherwise, been disclosed in accordance with the requirements of SSAP No. 5 along with the nature of the relationship to the beneficiary of the guarantee or undertaking?				
f. Has a description of material management or service contracts and cost sharing arrangements involving the reporting entity and any related party been disclosed? <b>Note:</b> This shall include, but is not limited to, sale lease-back arrangement, computer or fixed asset leasing arrangements, and agency contracts, that remove assets that may otherwise be recorded (and potentially non-admitted) on the reporting entity's financial statements.				
g. Has the nature of the control relationship whereby the reporting entity and one or more other enterprises are under common ownership or control and the existence of that control could result in operating results or financial position of the reporting entity being significantly different from those that would have been obtained if the enterprises were autonomous been disclosed? <b>Note:</b> Disclose the relationship even though there are no transactions between the enterprises.				
h. Has the amount deducted from the value of an upstream intermediate entity or ultimate parent owned, either directly or indirectly, via a downstream subsidiary, controlled, or affiliated entity, in accordance with SSAP No. 97. been disclosed?				

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i. Reporting entity must disclose each owner's ultimate controlling party and must provide a listing of other U.S. insurance groups or entities under that ultimate controlling party's control.				

## E. Leases

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- Do the financial statements include a general description of the lessee's leasing arrangements including, but not limited to, the following: [SSAP No. 22 par. 49(a)]

a. Rental expense for each period for which an income statement is presented, with separate amounts for minimum rentals, contingent rentals, and sublease rentals? <b>Note:</b> Rental payments under leases with terms of a month or less that were not renewed need not be included.				
b. The basis on which contingent rental payments are determined?				
c. The existence and terms of renewal or purchase options and escalation clauses?				
d. Restrictions imposed by lease agreements, such as those concerning dividends, additional debt, and further leasing?				
e. Identification of lease agreements that have been terminated early or for which the lessee is no longer using the leased property benefits, and the liability recognized in the financial statements under these agreements?				

- For leases having initial or remaining noncancelable lease terms in excess of one year has the following been disclosed: [SSAP No. 22 par. 49(b)]

a. Future minimum rental payments required as of the date of the latest balance sheet presented, in the aggregate and for each of the five succeeding years?				
b. The total of minimum rentals to be received in the future under noncancelable subleases as of the date of the latest balance sheet presented?				

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3. Have the following been disclosed with respect to sale-leaseback transactions: [SSAP No. 22 par. 49(c)]				
a. A description of the terms of the sale-leaseback transaction, including future commitments, obligations, provisions, or circumstances that require or result in the seller-lessee's continuing involvement?				
b. For those accounted for as deposits:				
1) The obligation for future minimum lease payments as of the date of the latest balance sheet presented in the aggregate and for each of the five succeeding years?				
2) The total of minimum sublease rentals, if any, to be received in the future under noncancelable subleases in the aggregate and for each of the five succeeding years?				
c. For those accounting for using the financing method:				
1) A description of the terms of the sale-leaseback transaction, including future commitments or obligations as well as financing obligation and lease liabilities.				
4. Have the following been disclosed when leasing is a significant part of the lessor's business activities in terms of revenue, net income, or assets? [SSAP No. 22 par. 50]				
a. For operating leases:				
1) The cost and carrying amount, if different, of property, plant or equipment on lease or held for leasing by major classes of property, plant or equipment according to nature or function, and the amount of accumulated depreciation in total as of the date of the latest balance sheet presented?				
2) Minimum future rentals on noncancelable leases as of the date of the latest balance sheet presented, in the aggregate and for each of the five succeeding years?				

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3) Total contingent rentals included in income for each period for which an income statement is presented?				
4) A general description of the lessor's leasing arrangements?				
b. For leveraged leases:				
1) A description of the terms including the pre-tax income from the leveraged leases? For purposes of presenting the investment in a leveraged lease in the lessor's balance sheet, the amount related deferred taxes shall be presented separately (from the remainder of the net investment).				
2) Separate presentation (from each other) of pre-tax income from the leveraged lease, the tax effect of pre-tax income, and the amount of investment tax credit recognized as income during the period?				
3) When leveraged leasing is a significant part of the lessor's business activities in terms of revenue, net income, or assets, the components of the net investment balance in leverage leases?				

#### F. Transfers of Financial Assets

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- For transfers of receivables reported as sales in accordance with SSAP No. 42, do the transferor's financial statements disclose: [SSAP No. 42 par. 7]

- The proceeds to the transferor?
- The gain or loss recorded on the sale?


- For Repurchase and Reverse Repurchase Agreements [ SSAP No. 103 par. 28(a)]

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	Yes	No	N/A	Comments
i. If the entity has entered into repurchase or reverse repurchase agreements, has information regarding the company policy or strategies for engaging in repo programs, policy for requiring collateral, as well as whether transactions have been accounted for as secured borrowings or as sale transactions been disclosed? <b>Note:</b> This disclosure shall include the terms of reverse repurchase agreements whose amounts are included in borrowing money. Has the following information been disclosed by type of agreement? [ SSAP No. 103 par. 28]				
a) Whether repo agreements are bilateral and/or tri-party trades				
b) Maturity time frame divided by the following categories: open or continuous term contracts for which no maturity date is specified, overnight, 2 days to 1 week, from 1 week to 1 month, greater than 1 month to 3 months, greater than 3 months to 1 year, and greater than 1 year				
c) Aggregate narrative disclosure of the fair value of securities sold and/or acquired that resulted in default. (This disclosure is not intended to capture "failed trades", which are defined as instances in which the trade did not occur as a result of an error and was timely corrected. Rather, this shall capture situations in which the non-defaulting party exercised their right to terminate after the defaulting party failed to execute.)				
ii. For repurchase transactions accounted for as secured borrowings, has the maximum amounts and end balance as of each reporting period (quarterly and annual) for the following been disclosed?				

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<p>a) Fair value of securities sold. (Book adjusted carrying value shall be provided as an end balance only.) This information is required in the aggregate, and by type of security categorized by NAIC designation, with identification of nonadmitted assets. Although legally sold as a secured borrowing, these assets are still reported by the insurer and shall be coded as restricted pursuant to the annual statement instructions, disclosed in accordance with SSAP No. 1–<i>Accounting Policies, Risks &amp; Uncertainties, and Other Disclosures</i> (SSAP No. 1), reported in the general interrogatories, and included in any other statutory schedules or disclosure requirements requesting information for restricted assets.</p>				
<p>b) Cash collateral and the fair value of security collateral (if any) received. This information is required in the aggregate and by type of security categorized by NAIC designation with identification of collateral securities received that do not qualify as admitted assets.</p>				
<p>1) For collateral received, has the aggregate allocation of the collateral by the remaining contractual maturity of the repurchase agreements (gross): overnight and continuous, up to 30 days, 30-90 days, greater than 90 days been disclosed? <b>Note:</b> This disclosure shall also include a discussion of the potential risks associated with the agreements and related collateral received, including the impact arising changes in the fair value of the collateral received and/or the provided security and how those risks are managed.</p>				



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<p>2) For cash collateral received that has been reinvested, has the total reinvested cash and the aggregate amortized cost and fair value of the invested asset acquired with the cash collateral been disclosed?</p> <p><b>Note:</b> This disclosure shall be reported by the maturity date of the invested asset: under 30 days, 60 days, 90 days, 120 days, 180 days, less than 1 year, 1-2 years, 2-3 years and greater than 3 years. To the extent that the maturity dates of the liability (collateral to be returned) does not match the invested assets, the reporting entity shall explain the additional sources of liquidity to manage those mismatches.</p>				
<p>c) Has the liability recognized to return cash collateral, and the liability recognized to return securities received as collateral as required pursuant to the terms of the secured borrowing transaction been disclosed?</p>				
<p>iii. For reverse repurchase transactions accounted for as secured borrowings, has the maximum amount and end balance as of each reporting period (quarterly and annual) for the following been disclosed? [ SSAP No. 103 par. 28]</p>				
<p>a) Fair value of securities acquired- Has the following information been reported in the aggregate, and by type of security categorized by NAIC designation, with identification of whether acquired assets would not qualify as admitted assets?</p>				

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<p>b) Has cash collateral and the fair value of security collateral (if any) provided been disclosed? (If security collateral was provided, book adjusted carrying value shall be provided as an end balance only.) <b>Note:</b> Disclosure shall identify the book adjusted carrying value of any nonadmitted securities provided as collateral. For collateral pledged, has the aggregate allocation of the collateral by the remaining contractual maturity of the reverse-repurchase agreements (gross): overnight and continuous, up to 30 days, 30-90 days, greater than 90 days been disclosed? This disclosure shall also include a discussion of the potential risks associated with the agreements and related collateral pledged, including obligations arising from a decline in the fair value of the collateral pledged and how those risks are managed.</p>				
<p>c) Has the recognized receivable for the return of collateral been disclosed? <b>Note:</b> Generally cash collateral, but including securities provided as collateral as applicable under the terms of the secured borrowing transaction. Receivables are not recognized for securities provided as collateral if those securities are still reported as assets of the reporting entity.</p>				
<p>d) Has the recognized liability to return securities acquired under the reverse-repurchase agreement as required pursuant to the secured borrowing transaction been disclosed? <b>Note:</b> Generally, a liability is required if the acquired securities are sold.</p>				
<p>iv. For repurchase transactions accounted for as a sale, has the maximum amounts and end balance as of each reporting period (quarterly and annual) for the following been disclosed? [SSAP No. 103 par. 28]</p>				

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<p>a) Has the fair value of securities sold (derecognized from the financial statements) been disclosed? (Book adjusted carrying value shall be provided as an end balance only, reflecting the amount derecognized from the sale transaction.)  <b>Note:</b> This information is required in the aggregate, and by type of security categorized by NAIC designation, with information on the book adjusted carrying value of nonadmitted assets sold.</p>				
<p>b) Has the cash and the fair value of securities (if any) received as proceeds and recognized in the financial statements been disclosed?  <b>Note:</b> This information is required in the aggregate and by type of security categorized by NAIC designation, with identification of received assets nonadmitted in the financial statements. All securities received shall be coded as restricted pursuant to the annual statement instructions, disclosed in accordance with SSAP No. 1, reported in the general interrogatories, and included in any other statutory schedules or disclosure requirements requesting information for restricted assets.</p>				
<p>c) Has the forward repurchase commitment recognized to return the cash or securities received been disclosed?  <b>Note:</b> Amount reported shall reflect the stated repurchase price under the repurchase transaction.</p>				
<p>v. For reverse repurchase transactions accounted for as sale, the maximum amounts and end balance as of each reporting period (quarterly and annual): [ SSAP No. 103 par. 28]</p>				

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a) Fair value of securities acquired and recognized on the financial statements. (Book adjusted carrying value shall be provided as an end balance only.) This information shall be reported in the aggregate, and by type of security categorized by NAIC designation. The disclosure also requires the book adjusted carrying value of nonadmitted assets acquired.				
b) Cash collateral and the fair value of security collateral (if any) provided. (If security collateral was provided, book adjusted carrying value shall be provided as an end balance only.) Disclosure shall also identify whether any nonadmitted assets were provided as collateral (derecognized from the financial statements).				
c) The forward resale commitment recognized (stated repurchase price) to sell the acquired securities.				
3. For collateral [ SSAP No. 103 par. 28(b)]				
i. If the entity has entered into securities lending transactions, has its policy for requiring collateral or other security and the fair value of the loaned security been disclosed?				
ii. If the entity has pledged any of its assets as collateral that are not reclassified and separately reported in the statement of financial position pursuant to paragraph 19.a., has the carrying amounts and classifications of both those assets and associated liabilities as of the date of the latest statement of financial position presented, including qualitative information about the relationship(s) between those assets and associated liabilities been disclosed?. For example, if assets are restricted solely to satisfy a specific obligation, the carrying amounts of those assets and associated liabilities, including a description of the nature of restrictions placed on the assets, shall be disclosed.				

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	Yes	No	N/A	Comments
iii. Has the reporting entity disclosed if it or its agent has accepted collateral that it is permitted by contract or custom to sell or repledge, the fair value as of the date of each statement of financial position presented of that collateral and of the portion of that collateral that it has sold or repledged, and information about the sources and uses of that collateral? Additionally, the reporting entity shall disclose the aggregate amount of contractually obligated open collateral positions (aggregate amount of securities at current fair value or cash received for which the borrower may request the return of on demand) and the aggregate amount of contractually obligated collateral positions under 30-day, 60-day, 90-day, and greater than 90-day terms.				
iv. If the entity has accepted collateral that it is not permitted by contract or custom to sell or repledge, has the entity disclosed such transactions, including the terms of the contract, and the current fair value of the collateral.				
v. For all securities lending transactions, had collateral for transactions that extend beyond one year from the reporting date been disclosed?				
vi. For securities lending transactions administered by an affiliated agent in which “one-line” reporting (paragraph 89.a.) of the reinvested collateral per paragraph 89.c. is optional, at the discretion of the reporting entity, has the aggregate value of the reinvested collateral which is “one line” reported and the aggregate value of items which are reported in the investment schedules (paragraph 89.b.) been disclosed? Identify the rationale between the items which are one line reported and those that are investment schedule reported and if the treatment has changed from the prior period.				
vii. Does disclosure for securities lending transactions, include separately, the amount of any loaned securities within the separate account and if the policy and procedures for the separate account differ from the general account?				

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4. Has the reporting entity provided the following information by type of program (securities lending or dollar repurchase agreement) with respect to the reinvestment of the cash collateral and any securities which it or its agent receives as collateral that can be sold or repledged: [ SSAP No. 103 Par 28(c)]				
i. The aggregate amount of the reinvested cash collateral (amortized cost and fair value)? Reinvested cash collateral shall be broken down by the maturity date of the invested asset – under 30-day, 60-day, 90-day, 120-day, 180-day, less than 1 year, 1-2 years, 2-3 years and greater than 3 years.				
ii. To the extent that the maturity dates of the liability (collateral to be returned) does not match the invested assets explanation of the additional sources of liquidity to manage those mismatches?				
5. For in-substance defeasance of debt [ SSAP No. 103 Par 28(d)]				
i. If debt was considered to be extinguished by in-substance defeasance, has the entity disclosed a general description of the transaction and the amount of debt that is considered extinguished at the end of each the period so long as that debt remains outstanding?				
6. For all servicing assets and servicing liabilities [ SSAP No. 103 Par 28(e)]				
i. Has the entity disclosed a description of the risks inherent in servicing assets and servicing liabilities and, if applicable, the instruments used to mitigate the income statement effect of changes in fair value to the servicing assets and servicing liabilities. (Disclosure of quantitative information about the instruments used to manage the risks inherent in servicing assets and servicing liabilities is encouraged but not required.)				

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ii. Has the amount of contractually specified servicing fees, late fees and ancillary fees earned for each period for which results of operations are presented, including a description of where each amount is reported in the statement of income been disclosed?				
iii. Has quantitative and qualitative information about the assumptions used to estimate the fair value (for example, discount rates, anticipated credit losses, and prepayment speeds? (An entity that provides quantitative information about the instruments used to manage the risks inherent in the servicing assets and servicing liabilities, as encouraged by paragraph 28..i., also is encouraged, but not required to disclose the quantitative and qualitative information about the assumptions used to estimate the fair value of those instruments)				
7. When servicing assets and servicing liabilities are subsequently measured at fair value have the following been disclosed: [ SSAP No. 103 Par 28(f)]				
i. For each class of servicing assets and servicing liabilities, the activity in the balance of servicing assets and the activity in the balance of servicing liabilities (including a description of where changes in fair value are reported in the statement of income for each period for which results of operations are presented), including, but not limited to, the following:				
a) The beginning and ending balance?				
b) Additions (through purchases of servicing assets, assumptions of servicing obligations, and recognition of servicing obligations that result from transfers of financial assets)?				
c) Disposals?				
d) Changes in fair value during the period resulting from (i) changes in valuation inputs or assumptions used in the valuation model and (ii) other changes in fair value and a description of those changes?				

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e) Other changes that affect the balance and a description of those changes?				
8. For securitizations, asset-backed financing arrangements, and similar transfers accounted for as sales when the transferor has continuing involvement (as defined in the glossary) with the transferred financial assets has the following been disclosed: [ SSAP No. 103 Par 28(g)]				
i. For each income statement presented:				
a) The characteristics of the transfer (including a description of the transferor's continuing involvement with the transferred financial assets, the nature and initial fair value of the assets obtained as proceeds and the liabilities incurred in the transfer, and the gain or loss from sale of transferred financial assets?				
b) For initial fair value measurements of assets obtained and liabilities incurred in the transfer, the following information:				
1) The level within the fair value hierarchy in which the fair value measurements in their entirety fall, segregating fair value measurements using quoted prices in active markets for identical assets or liabilities (Level 1), significant other observable inputs (Level 2), and significant unobservable inputs (Level 3)?				
2) The key inputs and assumptions used in measuring the fair value of assets obtained and liabilities incurred as a result of the sale that relate to the transferor's continuing involvement (including, at a minimum, but not limited to, and if applicable, quantitative information about discount rates, expected prepayments including the expected weighted-average life of prepayable financial assets, and anticipated credit losses, including expected static pool losses)?				



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<p>c) Cash flows between a transferor and transferee, including proceeds from new transfers, proceeds from collections reinvested in revolving-period transfers, purchases of previously transferred financial assets, servicing fees, and cash flows received from a transferor's beneficial interests?</p>				
<p>ii. For each statement of financial position presented, regardless of when the transfer occurred:</p> <p>a) Qualitative and quantitative information about the transferor's continuing involvement with transferred financial assets that provides financial statement users with sufficient information to assess the reasons for the continuing involvement and the risks related to the transferred financial assets to which the transferor continues to be exposed after the transfer and the extent that the transferor's risk profile has changed as a result of the transfer (including, but not limited to, credit risk, interest rate risk, and other risks), including:</p> <p>1) The total principal amount outstanding (BACV), the amount that has been derecognized, and the amount that continues to be recognized in the statement of financial position? The amount recognized (allocated fair value) by the reporting entity for the acquired participation in the transferred assets. The reporting schedules of both the transferred and reacquired assets. The percentage of beneficial interests from the reporting entity's transferred assets acquired by affiliated entities.</p>				

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2) The terms of any arrangements that could require the transferor to provide financial support (for example, liquidity arrangements and obligations to purchase assets) to the transferee or its beneficial interest holders, including a description of any events or circumstances that could expose the transferor to loss and the amount of the maximum exposure to loss?				
3) Whether the transferor has provided financial or other support during the periods presented that it was not previously contractually required to provide to the transferee or its beneficial interest holders, including when the transferor assisted the transferee or its beneficial interest holders in obtaining support, including:				
a. The type and amount of support?				
b. The primary reasons for providing the support?				
4) Information is encouraged about any liquidity arrangements, guarantees, and/or other commitments provided by third parties related to the transferred financial assets that may affect the transferor's exposure to loss or risk of the related transferor's interest.				
b) The entity's accounting policies for subsequently measuring assets and liabilities that relate to the continuing involvement with the transferred financial assets?				

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c) The key inputs and assumptions used in measuring the fair value of assets or liabilities that relate to the transferor's continuing involvement (including, at a minimum, but not limited to, and if applicable, quantitative information about discount rates, expected prepayments including the expected weighted-average life of prepayable financial assets, and anticipated credit losses, including expected static pool losses)?				
d) For the transferor's interests in the transferred financial assets, a sensitivity analysis or stress test showing the hypothetical effect on the fair value of those interests (including any servicing assets or servicing liabilities) of two or more unfavorable variations from the expected levels for each key assumption that is reported under paragraph 28.g.ii.(c) above independently from any change in another key assumption, and a description of the objectives, methodology, and limitations of the sensitivity analysis or stress test?				
e) Information about the asset quality of transferred financial assets and any other assets that it manages together with them. This information shall be separated between assets that have been derecognized and assets that continue to be recognized in the statement of financial position. This information is intended to provide financial statement users with an understanding of the risks inherent in the transferred financial assets as well as in other assets and liabilities that it manages together with transferred financial assets. For example, information for receivables shall include, but is not limited to:				
i. Delinquencies at the end of the period?				
ii. Credit losses, net of recoveries, during the period?				

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	Yes	No	N/A	Comments
9. For transfers of financial assets accounted for as secured borrowing has the following been disclosed (excluding repurchase and reverse repurchase transactions disclosed under paragraph 28.a.): [ SSAP No. 103 Par 28(h)]:				
i. The carrying amounts and classifications of both assets and associated liabilities recognized in the transferor's statement of financial position at the end of each period presented, including qualitative information about the relationship(s) between those assets and associated liabilities. For example, if assets are restricted solely to satisfy a specific obligation, the carrying amounts of those assets and associated liabilities, including a description of the nature of restrictions placed on the assets.				
10. Has a description of any loaned securities, including the amount, a description of, and the policy for, requiring collateral, and whether or not the collateral is restricted been disclosed? [ SSAP No. 103 Par 28(i)]				
11. Did the entity disclose a description of the securities underlying, dollar repurchase and dollar reverse repurchase agreements, including book values and fair values, and maturities for the following categories: (i) securities subject to dollar repurchase agreements; and (ii) securities subject to dollar reverse repurchase agreements? [ SSAP No. 103 Par 28(j)]				
12. Are transfers of receivables with recourse disclosed? [ SSAP No. 103 Par 28(k)].				
13. Has the reporting entity disclosed the following information for wash sales, as defined in paragraph 12, for all affiliated investment transactions (including items originally classified as cash equivalents and short-term investments) and for non-affiliated investments transactions with an NAIC designation of 3 or below, or unrated. ( <u>For non-affiliated investments, all cash equivalents, derivative instruments and short-term investments with credit assessments equivalent to an NAIC 1-2 designation are excluded from this disclosure.</u> ) [ SSAP No. 103 Par 28(l)]:				

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	Yes	No	N/A	Comments
i. A description of the reporting entity's objectives regarding these transactions?				
ii. An aggregation of transactions by NAIC designation 3 or below, or unrated?				
iii. The number of transactions involved during the reporting period?				
iv. The book value of securities sold?				
v. The cost of securities repurchased?				
vi. The realized gains/losses associated with the securities involved?				
14. Have the reporting entities that sold securities short within the reporting period, provided the following disclosures? [ SSAP No. 103, Par 28 (m)]				
i. Unsettled Short Sale Transactions (outstanding at report date) – The amount of proceeds received and the fair value of the securities to deliver, with current unrealized gains and/or losses, and the expected settlement timeframe (number of days)? <b>Note:</b> This disclosure should include the fair value of current transactions that were not settled within three days and the fair value of the short sales expected to be satisfied by a securities borrowing transaction. Also, the disclosure should be aggregated by security type. (For example, short sales of common stock should be aggregated and reported together.)				
ii. Settled Short Sale Transactions (settled during the reporting period) - The aggregate amount of proceeds received and the fair value of the security as of the settlement date with recognized gains and/or losses. This disclosure shall identify the aggregated fair value of settled transactions that were not settled within three days and the fair value of transactions that were settled through a securities borrowing transaction.				

**G. Fair Value or Net Asset Value (NAV) of Financial Instruments**

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- |  | Yes | No | N/A | Comments |
|--|-----|----|-----|----------|
| 1. For each class of assets and liabilities that are measured and reported at fair value or NAV in the statement of financial position after initial recognition, did the reporting entity disclose the following? [SSAP No. 100 par. 50]<br><b>Note:</b> The reporting entity shall determine appropriate classes of assets and liabilities in accordance with the annual statement instructions: |     |    |     |          |

- a. The fair value/NAV measurements at the reporting date?  
**Note:** Derivative assets and liabilities should be presented gross [SSAP No. 100 par. 50]

- b. The level of the fair value hierarchy within which the fair value measurements are categorized in their entirety (Level 1, 2 or 3)?  
**Note:** Investments reported at NAV shall not be captured within the fair value hierarchy, but shall be separately identified.  
**Note:** Derivative assets and liabilities should be presented gross [SSAP No. 100 par. 50]

- c. For fair value measurements categorized within Level 2 and Level 3 of the fair value hierarchy, a description of the valuation technique(s) and the inputs used in the fair value measurement? If there has been a change in the valuation technique (for example, changing from a market approach to an income approach or the use of an additional valuation technique), the reporting entity shall disclose that change and the reason(s) for making it.


2. For fair value measurements categorized within Level 3 of the fair value hierarchy is there a reconciliation from the opening balances to the closing balances disclosing separately changes during the period attributable to the following [SSAP No. 100 par. 50d]:

- a. Total gains or losses for the period recognized in income or surplus.  
**Note:** Derivative assets and liabilities may be presented gross or net [SSAP No. 100 par. 51].

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b. Purchases, sales, issues, and settlements (each type disclosed separately) <b>Note:</b> Derivative assets and liabilities may be presented gross or net [SSAP No. 100 par. 51].				
c. The amounts of any transfers into or out of Level 3, the reasons for those transfers, and the reasons for those transfers. Transfers into Level 3 shall be disclosed and discussed separately from transfers out of Level 3. <b>Note:</b> Derivative assets and liabilities may be presented gross or net [SSAP No. 100 par. 51].				
3. Has the reporting entity disclosed its policy for determining when transfers between levels are recognized? [SSAP No. 100 par. 50e]				
4. For investments measured using the NAV practical expedient, a reporting entity shall disclose information that helps users of its financial statements to understand the nature and risks of the investments and whether the investments, if sold, are probable of being sold at amounts different from net asset value per share.				

To meet that objective, a reporting entity shall disclose, at a minimum, the following information for instances in which the investment may be sold below NAV, or if there are significant restrictions in the liquidation of an investment held at NAV: [SSAP No. 100 par. 54]

a. The NAV along with a description of the investment / investment strategy of the investee.				
b. If the investment that can never be redeemed with the investees, but the reporting entity receives distributions through the liquidation of the underlying assets of the investees, the period of time over which the underlying assets are expected to be liquidated by the investees if the investee has communicated the timing to the reporting entity or announced the timing publicly. If the timing is unknown, the reporting entity shall disclose the fact.				
c. The amount of the reporting entity's unfunded commitments related to investments in the class.				

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	Yes	No	N/A	Comments
d. A general description of the terms and conditions upon which the investor may redeem the investment.				
e. The circumstances in which an otherwise redeemable investment in the class (or a portion thereof) might not be redeemable (for example, investments subject to a lockup or gate). Also, for those otherwise redeemable investments that are restricted from redemption as of the reporting entity's measurement date, the reporting entity shall disclose when the restriction from redemption might lapse if the investee has communicated that timing to the reporting entity or announced the timing publicly. If the timing is unknown, the reporting entity shall disclose that fact and how long the restriction has been in effect				
f. Any other significant restriction on the ability to sell investments in the class at the measurement date.				
g. If a group of investments would otherwise meet the criteria in (SSAP No. 100) paragraph 47 but the individual investments to be sold have not been identified (for example, if a reporting entity decides to sell 20 percent of its investments in private equity funds but the individual investments to be sold have not been identified), so the investments continue to qualify for the practical expedient in (SSAP No. 100) paragraph 41, the reporting entity shall disclose its plans to sell and any remaining actions required to complete the sale(s).				
5. Were the quantitative disclosures required by this standard presented using a tabular format? (See Exhibit A, SSAP No. 100) [SSAP No. 100 par. 52]				



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<p><b>Note:</b> The reporting entity is encouraged, but not required, to combine the fair value information disclosed under this standard with the fair value information disclosed under other accounting pronouncements (for example, disclosures about fair value of financial instruments) in the periods in which those disclosures are required, if practicable. The reporting entity also is encouraged, but not required, to disclose information about other similar measurements, if practicable. [SSAP No. 100 par. 55]</p>				
6. Has the entity disclosed in the notes to the financial statements, as of each date for which a statement of financial position is presented, the aggregate fair value or NAV of all financial instruments and the level of the fair value hierarchy in which the fair value measurements fall, summarized by type of financial instrument, for which it is practicable to estimate fair value, except for certain financial instruments identified in par. 57 of SSAP No. 100 <sup>2</sup> ? [SSAP No. 100 par. 56]				
7. Have fair value disclosed in the notes been presented together with the related admitted values in a form that makes it clear whether the fair values and admitted values represent assets or liabilities and to which line items in the Statement of Assets, Liabilities, Surplus and Other Funds they relate? [SSAP No. 100 par. 56] <b>Note:</b> Unless specified in another SSAP, the disclosures may be net of encumbrances, if the asset or liability is so reported.				

<sup>2</sup> SSAP No. 100 Par. 57 exceptions:

- Employers' and plans' obligations for pension benefits, other postretirement benefits including health care and life insurance benefits, postemployment benefits, employee stock option and stock purchase plans, and other forms of deferred compensation arrangements, as defined in SSAP No. 12, SSAP No. 104, SSAP No. 92, and SSAP No. 102.
- Substantively extinguished debt subject to the disclosure requirements of SSAP No. 103.
- Insurance contracts, other than financial guarantees and deposit-type contracts.
- Lease contracts as defined in SSAP No. 22
- Warranty obligation and rights.
- Investments accounted for under the equity method.
- Equity instruments issued by the entity.
- Deposit liabilities with no defined or contractual maturities.

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8. Have the method(s) and significant assumptions used to estimate the fair value of financial instruments been disclosed? [SSAP No. 100 par. 56] For example, the notes should specify the reported value of investments using market prices published by the NAIC Securities Valuation Office (SVO). In the absence of SVO published market values, or when amortized cost is used by the SVO as market value, quoted market prices by other third party organizations, if available, shall be used as the fair value of financial instruments.				
9. If it is not practicable for an entity to estimate the fair value of a financial instrument or class of financial instruments, and the investment does not qualify for the NAV practical expedient, has the following been disclosed: [SSAP No. 100 par. 58]				
a. Information pertinent to estimating the fair value of that financial instrument, such as the carrying amount, effective interest rate, and maturity?				
b. The reasons why it is not practicable to estimate fair value?				

**H. Financial Instruments With Off-Balance Sheet Risk**

- For financial instruments with off-balance-sheet risk, except as noted in paras. 14 and 15 of FASB 105, has the insurer disclosed the following information by class of financial instrument: [SSAP No. 27 par. 4-6]  
**Note:** The following are not subject to this disclosure: (1) insurance contracts, other than financial guarantees and investment contracts, (2) unconditional purchase obligations negotiated as part of a financing arrangement, (3) employers' and plans' obligations for pension benefits, postretirement healthcare and life insurance, employee stock option and stock purchase plans, deferred compensation arrangements, (4) financial instruments of a pension plan, (5) substantively extinguished debt, (6) lease contracts, (7) accounts and notes payable and other financial instruments that result in foreign currency accruals included in translated amounts.

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	Yes	No	N/A	Comments
a. The face or contract amount (or notional principal amount if there is no face or contract amount)?				
b. The nature and terms, including, at a minimum, a discussion of (i) the credit and market risk of those instruments, (ii) the cash requirements of those instruments, and (iii) the related accounting policy pursuant to the requirements of APB Opinion No. 22, Disclosure of Accounting Policies?				
c. The amount of accounting loss the entity would incur if any party to the financial instrument failed completely to perform according to the terms of the contract and the collateral or other security, if any, for the amount due proved to be of no value to the entity				
d. The entity's policy of requiring collateral or other security to support financial instruments subject to credit risk information about the entity's access to that collateral or other security, and the nature and a brief description of the collateral or other security supporting those financial statements				

**I. Financial Instruments With Concentrations of Credit Risk**

☐

1. Except for exemptions noted in par. 14 of FAS 105, have the following been disclosed about significant concentrations of credit risk arising from all financial instruments: [SSAP No. 27 par. 7]

a. Information about the (shared) activity, region, or economic characteristic that identifies the concentration?				
b. The amount of the accounting loss due to credit risk the entity would incur if parties to the financial instruments that make up the concentration failed completely to perform according to the terms of the contracts and the collateral or other security, if any, for the amount due proved to be of no value to the entity?				

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	Yes	No	N/A	Comments
c. The entity's policy of requiring collateral or other security to support financial instruments subject to credit risk, information about the entity's access to that collateral or other security, and the nature and a brief description of the collateral or other security supporting those financial instruments?				

## J. Contingencies

☐

1. If a loss contingency or impairment of an asset is not recorded due to failure to meet one of the conditions in par. 9a or 9b of SSAP No. 5, or if exposure to a loss exists in excess of the amount accrued, have the following been disclosed: [SSAP No. 5 par. 32]

- a. The loss contingency or impairment of the asset when there is at least a reasonable possibility that a loss or an additional loss may have been incurred?

- b. The nature of the contingency and an estimate of the possible loss or range of loss, or state that such an estimate cannot be made?

2. Have the nature and amount of any loss contingencies characterized by guarantees (e.g. guaranteed of indebtedness of other, guarantees to repurchase receivables that have been sold or otherwise assigned) been disclosed (even though the possibility of loss may be remote)? [SSAP No. 5 par. 34] (See Guarantees)

3. Have the nature of any material gain contingencies been disclosed? [SSAP No. 5 par. 38]  
**Note:** Care should be exercised to avoid misleading implications as to the likelihood of realization.

4. Gain contingencies realized subsequent to balance sheet date but prior to issuance of financial statements [SSAP No. 5 par. 16]


## K. Joint and Several Liabilities

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1. Has the following been disclosed for each joint and several liability arrangements accounted for under paragraph 5 of SSAP No. 5. If co-obligors are related parties, disclosure requirements in SSAP No. 25 —Affiliates and Other Related Parties also apply. [SSAP No. 5 par. 31]

Yes No N/A Comments

- a. The nature of the arrangement including: 1) how the liability arose, 2) the relationship with co-obligors, and 3) the terms and conditions of the arrangements.
- b. The total outstanding amount under the arrangement, which shall not be reduced by the effect of any amounts that may be recoverable from other entities.
- c. The carrying amount, if any, of the entity's liability and the carrying amount of a receivable recognized, if any.
- d. The nature of any recourse provisions that would enable recovery from other entities of the amounts paid, including any limitations on the amounts that might be recovered.
- e. In the period the liability is initially recognized and measured or in a period the measurement changes significantly: 1) the corresponding entry, and 2) where the entry was recorded in the financial statements.


**L. Guarantees**

☐

1. Has the guarantor entity disclosed the following information about each guarantee, or each group or similar guarantees (except product warranties addressed in paragraph 37), even if the likelihood of the guarantor's having to make any payments under the guarantee is remote: [SSAP No. 5 par. 35]

- a. The nature of the relationship to the beneficiary of the guarantee or undertaking (affiliated or unaffiliated)?

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	Yes	No	N/A	Comments
b. The nature of the guarantee, including the approximate term of the guarantee, how the guarantee arose, and the events and circumstances that would require the guarantor to perform under the guarantee, the ultimate impact to the financial statements (specific financial statement line item) after the settlement of the contract guarantee if action under the guarantee was required (e.g., increase to the investment, dividends to stockholder, etc) and the current status (that is, as of the date of the statement of financial position) of the payment/performance risk of the guarantee?				
c. The potential amount of future payments (undiscounted) the guarantor could be required to make under the guarantee? That maximum potential amount of future payments shall not be reduced by the effect of any amounts that may possibly be recovered under recourse or collateralization provisions in the guarantee (which are addressed under (d) below). If the terms of the guarantee provide for no limitation to the maximum potential future payments under the guarantee, that fact shall be disclosed. If the guarantor is unable to develop an estimate of the maximum potential amount of future payments under its guarantee, the guarantor shall disclose the reasons why it cannot estimate the maximum potential amount.				
d. The current carrying amount of the liability, if any, for the guarantor's obligations under the guarantee (including the amount, if any, recognized under paragraph 9), regardless of whether the guarantee is freestanding or embedded in another contract?				

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e. The nature of (1) any recourse provisions that would enable the guarantor to recover from third parties any of the amounts paid under the guarantee and (2) any assets held either as collateral or by third parties that, upon the occurrence of any triggering event or condition under the guarantee, the guarantor can obtain and liquidate to recover all or a portion of the amounts paid under the guarantee? The guarantor shall indicate, if estimable, the approximate extent to which the proceeds from liquidation of those assets would be expected to cover the maximum potential amount of future payments under the guarantee.				
2. Has an aggregate compilation of guarantee obligations been presented to include the maximum potential of future payments of all guarantees (undiscounted), the current liability (contingent and noncontingent) reported in the financial statements, and the ultimate financial statement impact based on maximum potential payments (undiscounted) if performance under those guarantees had been triggered? [SSAP No. 5 par. 36]				
3. As product warranties are excluded from the initial recognition and initial measurement requirements for guarantees, a guarantor is not required to disclose the maximum potential amount of future payments. Instead has the guarantor disclosed for product warranties the following information: [SSAP No. 5 par. 37]				
a. The guarantor's accounting policy and methodology used in determining its liability for product warranties (Including any liability associated with extended warranties)?				

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	Yes	No	N/A	Comments
b. A tabular reconciliation of the changes in the guarantor's aggregate product warranty liability for the reporting period? That reconciliation should present the beginning balance of the aggregate product warranty liability, the aggregate reductions in that liability for payments made (in cash or in kind) under the warranty, the aggregate changes in the liability for accruals related to product warranties issued during the reporting period, the aggregate changes in the liability for accruals related to pre-existing warranties (including adjustments related to changes in estimates), and the ending balance of the aggregate product warranty liability.				

#### M. Certain Significant Estimates

☐

- Have the following disclosures been made for significant estimates if it is at least reasonably possible that the estimates will change within one year of the date of the financial statements due to one or more confirming events and the effect of that change would be material: [SSAP No. 1 para. 12—13]

a. The nature of the uncertainty?				
b. An indication that it is at least reasonably possible that a change in the estimate will occur in the near term and that the change would be material to the financial statements?				
c. If the estimate involves a loss contingency as defined in SSAP No. 5, an estimate of the possible range of loss or a statement that a estimate cannot be made, and factors that cause the estimate to be sensitive to change?				

#### N. Concentrations

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- |   | Yes | No | N/A | Comments |
|---|-----|----|-----|----------|
| 1. Have the following concentrations and the general nature of the risk associated with each been disclosed if (a) the concentration exists at the financial statement date, (b) the concentration makes the entity vulnerable to the risk of a near-term severe (more than material but less than catastrophic) impact, and (c) it is at least reasonably possible that the events that could cause the severe impact will occur in the near term: [SSAP No. 1 par. 15—16] |     |    |     |          |

- Concentrations in the volume of business transacted with a particular customer, supplier or lender?  
**Note:** It is always considered at least reasonably possible that any customer will be lost in the near term.
- Concentrations in revenue from particular products or services?
- Concentrations in the available sources of labor, services, licenses or other rights used in the entity's operations?
- Concentrations in the market or geographic area in which an entity conducts its operations?  
**Note:** It is always considered at least reasonably possible that operation located outside an entity's home country will be disrupted in the near term.


#### O. Going Concern

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- If after considering management's plans, substantial doubt about an entity's ability to continue as a going concern is alleviated, the reporting entity shall disclose in the note to the financial statements the following information [SSAP No. 1 par. 19]:
  - Principal conditions and events that raised substantial doubt about the entity's ability to continue as a going concern (before consideration of management's plans).
  - Management's evaluation of the significance of those conditions or events in relation to the entity's ability to meet its obligations.


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	Yes	No	N/A	Comments
c. Management's plans that alleviated substantial doubt about the entity's ability to continue as a going concern.				
2. If after considering management's plans, substantial doubt about an entity's ability to continue as a going concern is not alleviated, has the entity included a statement in the notes to the financial statements indicating that there is substantial doubt about the entity's ability to continue as a going concern within one year after the date that the financial statements are issued? [SSAP No. 1 par. 20]				
3. Additionally, has the reporting entity shall disclosed the information in paragraphs 19.a. and 19.b., as well as the management's plans that are intended to mitigate the conditions or events that raise substantial doubt about the entity's ability to continue as a going concern? [SSAP No. 1 par. 20]				
4. If substantial doubt was determined, and the conditions or events continue to raise substantial doubt about an entity's ability to continue as a going concern in subsequent annual or interim reporting periods, has the entity continued to provide the disclosures in each subsequent reporting period? In these subsequent periods have the disclosures become more extensive as additional information has become available about the relevant conditions or events and about management's plans? Has the entity provided appropriate context and continuity in explaining how conditions or events have changed between reporting periods? [SSAP No. 1 par. 21]				
5. For the period in which substantial doubt no longer exists (before or after consideration of management's plans), has the entity disclosed how the relevant conditions or events that raised substantial doubt were resolved? [SSAP No. 1 par. 22]				

**P. Subsequent Events**

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1. For material Type I subsequent events, has the nature and the amount of the adjustment been disclosed, if necessary to keep the financial statements from being misleading? [SSAP No. 9 par. 7]				
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	Yes	No	N/A	Comments
2. Have all events relating to Type II subsequent events that may have a material effect on the financial condition of the company been disclosed? For such events, an entity shall disclose the nature of the event and an estimate of its financial effect, or a statement that such an estimate cannot be made. [SSAP No. 9 par. 8]				
3. If the Type II subsequent event is of such a nature that pro forma disclosures are necessary to keep the financial statements from being misleading, has supplemental pro forma financial data including the impact on net income, surplus, total assets, and total liabilities giving effect to the event as if it occurred on the date of the balanced sheet been disclosed? [SSAP No. 9 par. 9]				
4. Has the reporting entities disclosed the dates through which subsequent events have been evaluated along with the date the financial statements were issued, or available to be issued? [SSAP No. 9 par. 13]				
5. Do the audited financial statements specifically identify subsequent events identified after the date subsequent events were reviewed for statutory reporting, i.e. annual statement reporting? [SSAP No. 9 par. 13]				

**Q. Accounting Changes and Corrections of Errors**

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1. Have material changes in accounting principles and/or correction of errors been disclosed, including: [SSAP No. 3 par. 13]				
a. A brief description of the change, encompassing a general disclosure of the reason and justification for the change or correction?				
b. The impact of the change or correction on net income, surplus, total assets and total liabilities for the two years presented in the financial statements (i.e., the balance sheet and statement of income and operations)?				

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	Yes	No	N/A	Comments
c. The effect on net income of the current period for a change in estimate that affects several future periods, such as a change in the service lives of depreciable assets or actual assumptions affecting pension costs? <b>Note:</b> Disclosure of the effect on those income statement amounts is not necessary for estimates made each period in the ordinary course of accounts for items such as uncollectible accounts. However, disclosure is recommended if the effect of a change in the estimate is material.				
d. Changes in accounting that are changes in reserve valuation basis as described in SSAP No. 51—Life Contracts which have elected phase-in provided for in the Valuation Manual Section VM 21, shall also include in the change in accounting disclosures information regarding the application of any phase in as provided for in SSAP No. 51.				
e. When subsequent financial statements are issued containing comparative restated results as a result of the filing of an amended financial statement, the fact that the prior period has been restated and the nature and amount of such restatement.				

## R. Asbestos/Environmental Reserves

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1. If the company is potentially exposed to asbestos and/or environmental claims, have the following been disclosed: [SSAP No. 65 par. 43]

a. Reserving methodology for both case and IBNR reserves?				
b. Amount paid and reserved for losses and LAE for asbestos and/or environmental claims, on a direct, assumed and net of reinsurance basis? <b>Note:</b> The reserves disclosed in this note should exclude amounts relating to policies specifically written to cover asbestos and environmental exposures. Each company should report only its share of a group amount (after applying its respective pooling percentage) if the company is a member of an intercompany pooling agreement.				

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c. Description of the lines of business written for which there is potential exposure of a liability due to asbestos and/or environmental claims, and the nature of the exposure(s)?				
d. The following for each of the <i>two</i> most current calendar years on both a gross and net of reinsurance basis, separately for asbestos and environmental losses (including coverage dispute costs): <b>Note:</b> SSAP 65 states that following disclosures are required for the five most recent calendar years, however INT 02-10 par. 4 clarifies this requirement to be <i>five</i> years for annual statements and two years for audited statutory statements.				
1) Beginning Reserves?				
2) Incurred losses and LAE?				
3) Calendar year payments for losses and LAE?				
4) Ending reserves?				

## S. Assessments

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- For guaranty fund and other non-Section 9010 ACA assessments, has the reporting entity disclosed the following: [SSAP No. 35 par. 18]

a. The nature of any assessments that could have a material financial effect, by type of assessment, and the estimate of the liability, identifying whether the corresponding liability has been recognized, a liability has not been recognized as the obligating event has not yet occurred, or that an estimate cannot be made?				
b. For assessments with liabilities recognized, the amount of the recognized liabilities, any related asset for premium tax credits or policy surcharges, the periods over which the assessments are expected to be paid, and the period over which the recorded premium tax offsets or policy surcharges are expected to be realized?				

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	Yes	No	N/A	Comments
c. Assets recognized from paid and accrued premium tax offsets or policy surcharges, and include a reconciliation of assets recognized within the previous year's Annual Statement to the assets recognized in the current year's Annual Statement? <b>Note:</b> The reconciliation shall reflect, in aggregate, each component of the increase and decrease in paid and accrued premium tax offsets and policy surcharges, including the amount charged off.				
d. When there is at least a reasonable possibility that the impairment of an asset from premium tax offsets or policy surcharges may have been incurred, disclosures required by paragraph 31 of SSAP No. 5? (See <a href="#">Contingencies</a> )				

- e. The financial statements shall disclose the following related to guaranty fund liabilities and assets related to assessments from insolvencies of entities that wrote long-term care contracts:

**Note:** The disclosures shall be by insolvency except for ii., which is the same rate for all discounted insolvencies. [Illustrations for these disclosures are in SSAP No. 35 par. 18]

i. The undiscounted and discounted amount of the guaranty fund assessments and related assets				
ii. The discount rate applied as of the current reporting date				
iii. The number of jurisdictions for which the long-term care guaranty fund assessments payables were discounted and the number of jurisdictions for which asset recoverables were discounted				
iv. Identify the ranges of years used to discount the assets and the range of years used to discount the liabilities				

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v. The weighted average numbers of years of the discounting time period for long-term care guaranty fund assessment liabilities				
vi. The weighted average number of years of the discounting time period for the asset recoverables				
2. Do the financial statements disclose on an annual and quarterly basis beginning in the first quarter of 2014, the assets, liabilities and revenue elements for the permanent risk adjustment program regarding the risk-sharing provisions of the Affordable Care Act for the reporting periods which are impacted by the programs including the listing in paragraph 60.a.? Has the reporting entity also indicated if they wrote any accident and health insurance premium, which is subject to the Affordable Care Act risk-sharing provisions? In the event that the balances are zero, has the reporting entity provided context to explain the reasons for the zero balances, including insufficient data to make an estimate, no balances or premium was excluded from the program, etc.? Do asset balances reflect admitted asset balances? Does the disclosure include the following: [SSAP No. 107 par. 60]				
a. ACA Permanent Risk Adjustment Program				
1) Premium adjustments receivable due to ACA Risk Adjustment (including high-cost risk pool payments)				
2) Risk adjustment user fees payable for ACA Risk Adjustment				
3) Premium adjustments payable due to ACA Risk Adjustment (including high-cost risk pool ceded premium)				
4) Reported as revenue in premium for accident and health contracts(written/collected) due to ACA Risk Adjustment				
5) Reported in expenses as ACA risk adjustment user fees (incurred/paid)				

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3. In addition, beginning in annual 2014 and both quarterly and annual thereafter, a roll forward of prior year ACA risk-sharing provisions specified asset and liability balances shall be disclosed in the annual statutory Notes to Financial Statements, as illustrated in Exhibit B. Note for the roll forward illustration, assets shall be reflected gross of any nonadmission. The reasons for adjustments to prior year balances (i.e. federal audits, revised participant counts, information which impacted risk score projections, etc.) shall also be disclosed. The beginning receivable or payable in the roll forward will reflect the prior year-end balance for the specified benefit. [SSAP No. 107 par. 61]				

#### T. Business Combinations and Goodwill

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1. For business combinations accounted for under statutory purchase method, have the following for as long as unamortized goodwill is reported as a component of the investment been disclosed: [SSAP No. 68 par. 15]

a. The name and brief description of the acquired company?				
b. Method of accounting, that is, the statutory purchase method?				
c. Acquisition date, cost of the acquired entity, the original amount of goodwill and the original amount of admitted goodwill				
d. Each SCA's book value, the amount of amortization of goodwill recorded for the period; the SCA's admitted goodwill as of the reporting date				
e. Total admitted goodwill as of the reporting date				
f. Admitted goodwill as a percentage of the SCA's book adjusted carrying value (gross of admitted goodwill).				

2. For business combinations taking the form of a statutory merger, have the following been disclosed: [SSAP No. 68 par. 16]



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a. The names and brief description of the combined companies?				
b. Method of accounting, that is, the statutory merger method?				
c. Description of the shares of stock issued or cancelled in the transaction?				
d. Details of the results of operations of the previously separate companies for the period before the combination is consummated that are included in the current combined net income, including revenue, net income, and other changes in surplus?				
e. A description of any adjustments recorded directly to surplus for any company that previously did not prepare statutory statements?				
3. Has the following information been disclosed, regarding goodwill resulting from assumption reinsurance: [SSAP No. 68 par. 17]				
a. The name of the ceding insurer?				
b. The type of business assumed?				
c. The cost of the acquired business and the amount of goodwill?				
d. The amount of amortization of goodwill recorded for the period?				
4. If any impairment loss of an entity acquired through purchase, was recognized, have the following been disclosed, in the period of the impairment write-down: [SSAP No. 68 par. 18]				
a. A description of the impaired assets and the facts and circumstances leading to the impairment?				
b. The amount of the impairment charged to realized capital gains and losses and how fair value was determined?				
5. Have the subcomponents and calculation of adjusted surplus and total admitted goodwill as a percentage of adjusted surplus been reported? [SSAP No. 68 Par. 19]				

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#### U. Business Interruption Insurance

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1. For recoveries under an entity's business insurance policies, has the following information been disclosed in the notes to the financial statements in the period(s) in which business insurance recoveries are recognized: [SSAP No. 24 par. 17]

- a. The nature of the event resulting in business interruption losses?
- b. The aggregate amount of business insurance recoveries recognized during the period and the line item(s) in the statement of operations in which those recoveries are classified (including amounts defined as an extraordinary item pursuant to SSAP No. 24)?


#### V. Derivative Financial Instruments

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1. Have the following been disclosed by the reporting entity for all derivative contracts used: [SSAP No. 86 par. 63a]

- I.A description of the reporting entity's objectives for using derivatives, i.e., hedging, income generation or replication?
- II.A description of the context needed to understand those objectives and its strategies for achieving those objectives?
- III.The description for hedging objectives shall identify the category, e.g., fair value hedges, cash flow hedges, or foreign currency hedges, and for all objectives, the type of instrument(s) used.
- IV.A description of the accounting policies for derivatives including the policies for recognizing (or reasons for not recognizing) and measuring the derivatives used, and when recognized, where those instruments and related gains and losses are reported?


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V. Identification of whether the reporting entity has derivative contracts with financing premiums? (For purposes of this term, this includes scenarios in which the premium cost is paid at the end of the derivative contract or throughout the derivative contract.)				
VI. The net gain or loss recognized in unrealized gains or losses during the reporting period representing the component of the derivative instruments' gain or loss, if any, excluded from the assessment of hedge effectiveness?				
VII. The net gain or loss recognized in unrealized gains or losses during the reporting period resulting from derivatives that no longer qualify for hedge accounting? For portfolio layer method hedges, are circumstances that led to the breach disclosed?				
VIII. The accounting policy regarding where cash flows associated with derivative instruments and their related gains and losses are presented in the statement of cash flow.				
2. Have the following been disclosed by the type of instrument outstanding, e.g., call options, floors, etc: [SSAP No. 86 par. 63b]				
a. Notional or contract amounts?				
b. Carrying and fair values?				
c. A discussion of the market risk, credit risk, and cash requirements of the derivatives?				
3. Have the following been disclosed for derivatives held for other-than-hedging purposes: [SSAP No. 86 par. 63c]				
a. Average fair value of the derivatives during the reporting period together with the related end-of-period fair value distinguishing between assets and liabilities?				

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b. Net gains or losses detailed by class, business activity or other category that is consistent with the management of those activities and where the net gains or losses are reported?				
4. Do the financial statements disclose details of covered items and/or written transactions to allow evaluation of cash flow implications for all written covered options used for income generation? [SSAP No. 86 par. 63d]				
5. Have the following been disclosed by a seller of credit derivatives about its credit derivatives and hybrid instruments that have embedded credit derivatives to enable users of financial statements to assess their potential effect on its financial position, income and cash flows: [SSAP No. 86 par. 63e] <b>Note:</b> The seller of a credit derivative shall disclose the following information for each credit derivative, or each group of credit derivatives, even if the likelihood of the seller's having to make any payments under the credit derivative is remote. With respect to hybrid instruments that have embedded credit derivatives, the seller of the embedded credit derivative shall disclose the required information for the entire hybrid instrument, not just the embedded credit derivative.				
a. The nature of the credit derivative, including the approximate term of the credit, the reason(s) for entering into the credit derivative, the events or circumstances that would require the seller to perform under the credit derivative, and the current status (that is, as of the date of the statement of financial position) of the payment/performance risk of the credit derivative?				

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<p>b. The maximum potential amount of future payments (undiscounted) the seller could be required to make under the credit derivative?</p> <p><b>Note:</b> The maximum potential amount of future payments shall not be reduced by the effect of any amounts that may possibly be recovered under recourse or collateralization provisions in the credit derivative. If the terms of the credit derivative provide for no limitation to the maximum potential future payments under the contract, that fact shall be disclosed. If the seller is unable to develop an estimate of the maximum potential amount of future payments under the credit derivative, the seller shall disclose the reasons why it cannot estimate the maximum potential amount.</p>				
<p>c. The fair value of the credit derivative as of the date of the statement of financial position?</p>				
<p>d. The nature of (1) any recourse provisions that would enable the seller to recover from third parties any of the amounts paid under the credit derivative and (2) any assets held either as collateral<sup>3</sup> or by third parties that, upon the occurrence of any specified triggering event or condition under the credit derivative, the seller can obtain and liquidate to recover all or a portion of the amounts paid under the credit derivative?</p> <p><b>Note:</b> The seller shall indicate, if estimable, the approximate extent to which the proceeds from liquidation of those assets would be expected to cover the maximum potential amount of future payments under the credit derivative. In its estimate of potential recoveries, the seller of credit protection shall consider the effect of any purchased credit protection with identical underlying(s).</p>				

<sup>3</sup> Collateral, as calculated on an individual derivative instrument basis, shall be determined by deducting collateral paid/pledged from collateral received if the counterparty has a legal right to offset as defined in SSAP No. 64.

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6. If the entity is the holder of a financial instrument with an embedded credit derivative that expose the holder to the possibility (however remote) of being required to make future payments (not merely receive reduced cash inflows), not caused by subordination, has it disclosed the following for the entire hybrid instrument: [SSAP No. 86 par. 63f]				
a. The nature of the embedded credit derivative, including the approximate term of the embedded credit derivative, the events or circumstances that would require the holder to perform under the embedded credit derivative, and the current status (that is, as of the date of the statement of financial position) of the payment/performance risk of the embedded credit derivative?				
b. The maximum potential amount of future payments (undiscounted) the holder could be required to make under the embedded credit derivative. That maximum potential amount of future payments shall not be reduced by the effect of any amounts that may possibly be recovered under recourse or collateralization provisions in the embedded credit derivative. If the terms of the embedded credit derivative provide for no limitation to the maximum potential future payments under the contract, that fact shall be disclosed. If the holder is unable to develop an estimate of the maximum potential amount of future payments under the embedded credit derivative, the holder shall disclose the reasons why it cannot estimate the maximum potential amount?				
c. The fair value of the hybrid instrument containing the embedded credit derivative as of the date of the statement of financial position.				

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d. The nature of:				
<p><b>Note:</b> The holder shall indicate, if estimable, the approximate extent to which the proceeds from liquidation of those assets would be expected to cover the maximum potential amount of future payments under the embedded credit derivative. In its estimate of potential recoveries, the holder of credit protection shall consider the effect of any purchased credit protection with identical underlying(s).</p>				
<p>i. any recourse provisions that would enable the holder to recover from third parties any of the amounts paid under the embedded credit derivative.</p>				
<p>ii. any assets held either as collateral<sup>4</sup> or by third parties that, upon the occurrence of any specified triggering event or condition under the embedded credit derivative, the holder can obtain and liquidate to recover all or a portion of the amounts paid under the credit derivative.</p>				

7. Have the following been disclosed for derivatives accounted for as cash flow hedges of a forecasted transaction: [SSAP No. 86 par. 63g]

a. The maximum length of time over which the entity is hedging its exposure to the variability in future cash flows for forecasted transactions excluding those forecasted transactions related to the payment of variable interest on existing financial instruments?				
b. The amount of gains and losses classified in unrealized gains/losses related to cash flow hedges that have been discontinued because it was no longer probable that the original forecasted transactions would occur by the end of the originally specified time period or within 2 months of that date?				

<sup>4</sup> See footnote 3

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8. Have the following been disclosed for derivative contracts with financing premiums: [SSAP No. 86 par. 63h]				
a. The aggregate, non-discounted total premium cost for these contracts and the premium cost due in each of the following four years, and thereafter.				
b. For each derivative contract with financing premiums:				
i. Whether premium cost is paid throughout the contract, or at derivative maturity;				
ii. Next premium cost payment date;				
iii. Total premium cost;				
iv. Premium cost paid in prior years;				
v. Current year premium cost paid;				
vi. Future unpaid premium cost;				
vii. Fair value of derivative, excluding impact of financing premiums;				
viii. Unrealized gain/loss, excluding impact of financing premiums				

**W. Derivatives Hedging Variable Annuity Guarantees**

1. A reporting entity that has any outstanding derivatives accounted for under this special accounting provision, or that has unamortized deferred assets and/or deferred liabilities (representing previously unrecognized qualifying fair value fluctuations) from expired derivatives under the special accounting provision shall disclose the following within the financial statements: [SSAP No. 108 par. 23]



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a. Discussion of hedged item, including information on the guarantees sensitive to interest rate risk, along with information on the designated hedging instruments being used to hedge the risk. Discussion of the hedging instruments shall identify whether a hedging instrument is a single instrument or portfolio, as well as information on the hedging strategy (including whether there have been changes in strategy from the prior reporting period, along with detailed information on the changes), and assessment of hedging effectiveness and compliance with the “Clearly Defined Hedging Strategy” of VM-01. Identification shall occur on whether the hedged item is intended to be fully hedged under the hedging strategy, or if the strategy is only focused on a portion of the liability characteristics or a portion of the interest rate sensitivity. Hedging strategies shall be identified as highly effective or not highly effective. If the strategy for a particular hedging relationship excludes a specific component of the gain or loss, or related cash flows, from the assessment of hedge effectiveness, details on the excluded components shall be disclosed.				
b. Aggregate disclosure of the original cost and fair value of hedging instruments (including all instruments within a portfolio), including any net investment income, realized and unrealized gains and losses during the reporting period. Additionally, disclose the fair value of the hedged item, the change in fair value from the prior reporting period, and the portion of the fair value change attributed to the hedged risk.				

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c. Schedule showing the aggregate fair value change from the prior reporting period for the designated components for all hedging instruments, with identification of the fair value change reflected in realized gains, realized losses, deferred assets, and deferred liabilities. This schedule shall also show the current period amortization, including any accelerated amortization elected by the reporting entity, and the future scheduled amortization of the deferred assets and deferred liabilities. This schedule shall identify the fair value of the excluded components of the hedging instruments, and the fair value change for those components reflected in unrealized gain and unrealized loss.				
d. For hedging strategies no longer identified as highly effective previously captured within scope of this standard, information on the determination of ineffectiveness, including variations from prior assessments resulting in the change from classification as a highly effective hedge. This disclosure shall also include:				
i. Identification of outstanding hedging instruments previously captured within scope of this standard and subsequently identified as no longer part of a highly effective hedging strategy. This disclosure shall identify the date in which the domiciliary state was notified that the hedging strategy had been identified by the reporting entity as no longer highly effective.				
ii. Deferred assets and deferred liabilities previously recognized when the program was highly effective, with a schedule that shows the amortization that would have occurred if the program had remained highly effective, the amount of original amortization as well as a schedule that details the amortization that will occur as the program is no longer highly effective (maximum five-year timeframe).				

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iii. Disclosure on whether the reporting entity is electing to accelerate amortization (in advance of the remaining scheduled amortization or the maximum five-year timeframe), along with amounts immediately recognized to unrealized gains/losses, and how the election impacts the scheduled amortization.				
e. For situations in which the reporting entity has elected to terminate the hedging strategy and/or discontinue the special accounting provisions permitted within this SSAP, the reporting entity shall disclose the key elements in the reporting's entity' decision to terminate, identifying changes in the reporting entity's objectives or perspectives from initial application. This disclosure shall also include:				
i. Identification of outstanding hedging instruments previously captured within scope of this standard and the accounting impact as a result of the termination/discontinuation. (Open derivative transactions no longer captured within the special accounting provision would be subject to the accounting and reporting guidance within SSAP No. 86.) This disclosure shall identify the date in which the domiciliary state was notified that the hedging strategy or the election to use the special accounting provision in this SSAP had been terminated.				
ii. Deferred assets and deferred liabilities previously recognized under the hedging strategy and/or program, with a schedule that shows the amortization that would have occurred if the strategy and/or program had remained highly effective, as well as a schedule that details the amortization that will occur with the termination of the strategy and/or program (maximum five-year timeframe).				

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iii. Disclosure on whether the reporting entity is electing to accelerate amortization (in advance of the remaining scheduled amortization or the maximum five-year timeframe), along with amounts immediately recognized to unrealized gains/losses, and the resulting impact to the scheduled amortization.				

#### X. Discontinued Operations

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1. Have the results of a reporting entity's discontinued operations been reported consistently with the entity's reporting of continuing operations (i.e., no separate line item presentation in the balance sheet or statement of operations aggregating current and future losses from the measurement date)? [SSAP No. 24 par. 7]				
2. If the entity decides not to sell the discontinued operation, have the assets been reported at the lower of the carrying amount before the asset was classified held for sale, adjusted for depreciation that would have been recognized if the asset had not been classified as held for sale, or fair value at the date of the decision not to sell? [SSAP No. 24 par. 8]				
3. Has the following been disclosed in the notes to the financial statements that cover the period in which a discontinued operation either has been disposed of or is classified as held for sale under paragraph SSAP No. 24 par. 2.a.: [SSAP No. 24 par. 11]				
a. Description of the facts and circumstances leading to the disposal or expected disposal and a description of the expected manner and timing of that disposal.				
b. The loss recognized on the discontinued operation. The recognized loss shall be reported for the reporting period, and as a cumulative total since classified as held for sale.				

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c. The carrying amount immediately prior to the classification as held for sale, and the current fair value less costs to sell, including the balance sheet lines where the item is reported. Also report income received from the discontinued operation prior to the disposal transaction.				
4. If the entity decided to change its plan of sale for the discontinued operation, did the entity disclose a description of the facts and circumstances leading to the decision to change the plan and the effect on the assets reported in the financial statements? [SSAP No. 24 par. 12]				
5. Did the entity report adjustments to amounts reported related to discontinued operations as a result of: [SSAP No. 24 par. 13]				
a. The resolution of contingencies that arise pursuant to the terms of the disposal transaction, such as the resolution of purchase price contingencies and indemnification issues with the purchaser?				
b. The resolution of contingencies that arise from and are directly related to the disposal of a discontinued operation of the component in a period prior to its disposal, such as environmental and product warranty obligations retained by the seller?				
c. The settlement of employee benefit plan obligations (pension, postemployment benefits other than pensions, and other postemployment benefits), provided the settlement is directly related to the disposal transaction. (A settlement is directly related to the disposal transaction if there is a demonstrated direct cause-and-effect relationship and the settlement occurs no later than one year following the disposal transaction, unless it is delayed by events or circumstances beyond an entity's control.)?				

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	Yes	No	N/A	Comments
6. If the entity will retain significant continuing involvement (such as a supply and distribution arrangement, a financial guarantee, an option to repurchase and an equity method investment in the discontinued operation) with a discontinued operation after the disposal transaction, has the entity disclosed the following: [SSAP No. 24 par. 14]				
a. Description of the activities that give rise to the continuing involvement.				
b. The period of time the involvement is expected to continue.				
c. The expected cash inflows/outflows as a result of continuing involvement.				
7. If the entity will retain an equity interest in the discontinued operations after the disposal date, did the reporting entity disclose the ownership interest before and after the disposal transaction and the entity's share of the income or loss of the investee as of the year-end reporting date after the disposal transaction? [SSAP No. 24 par. 15]				

#### Y. Employee Stock Ownership Plans

☐

1. Does an employer sponsoring an ESOP disclose the following information about the plan: [SSAP No. 12 par. 17]

a. A description of the plan, the basis for determining contributions, including the employee groups covered, and the nature and effect of significant matters affecting comparability of information for all periods presented. For leveraged ESOP's and pension reversion ESOP's, the description shall include that basis for releasing shares and how dividends on allocated and unallocated shares are used?				
b. A description of the accounting policies followed for ESOP transactions, including the method of measuring compensation and the classification of dividends on ESOP shares?				
c. The amount of compensation cost recognized during the period?				

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	Yes	No	N/A	Comments
d. The number of allocated shares, committed-to-be released shares, and suspense shares held by the ESOP at the balance sheet date?				
e. The fair value of unearned ESOP shares at the balance sheet date?				
f. The existence and nature of any repurchase obligation, including disclosure of the fair value of the shares allocated as of the balance sheet date that are subject to repurchase obligation?				
2. Has the reporting entity disclosed the amount of any capital gain or loss on extinguishment of debt charge to operations? [SSAP No. 12 par. 7]				

## Z. Forward Commitments

☐

1. Have forward commitments which are not derivative instruments (e.g. the commitment to purchase a GNMA security two months after the commitment date, or a private placement six months after the commitment date) been disclosed? [SSAP No. 1 par. 24]				
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## AA.High Deductibles

☐

1. Do the financial statements disclose the following related to high deductible policies [SSAP No. 65 par. 38]:				
a. Gross (of high deductible) amount of loss reserves, unpaid by line of business.				
b. The amount of reserve credit that has been recorded for high deductibles on unpaid claims and the amounts that have been billed and are recoverable on paid claims, by line of business and the total of these two numbers.				
c. Related to the amounts that have been billed and are recoverable on paid claims:				

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	Yes	No	N/A	Comments
i. Paid recoverable amounts that are over 90 days overdue, and				
ii. The amounts nonadmitted				
d. Total collateral pledged to the reporting entity related to deductible and paid recoverables:				
ii. the amount of collateral on balance sheet, and				
iii. the amount of collateral off balance sheet.				
e. The total amount of unsecured high deductible amounts related to unpaid claims and for paid recoverables and the total percentage that is unsecured.				
f. Highest ten unsecured high deductible amounts by counterparty ranking.				
<p><b>Note:</b> The counterparty does not have to be named, just amount by counterparty 1, counterparty 2, etc. For this purpose, a group of entities under common control shall be regarded as a single customer.</p>				
2. For unsecured high deductible recoverables, If the individual obligor is part of a group under the same management or control, such as a professional employer organization (PEO), list the individual obligors, each of its related group members, and the total unsecured aggregate recoverables on high deductible policies for the entire group, which are greater than 1% of capital and surplus. For this purpose, a group of entities under common control shall be regarded as a single customer. [SSAP No. 65 par. 39]				

## BB. Intercompany Pooling Arrangements

☐

- If the company is part of a group of affiliated insurers that utilizes a pooling arrangement that affects the solvency and integrity of the insurer's reserves under which the pool participants cede substantially all of their direct and assumed business to the pool, have such arrangement[s] been disclosed, including: [SSAP No. 63 par. 12]



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	Yes	No	N/A	Comments
a. The basic terms of such arrangement[s] and the related accounting?				
b. Identification of the lead company and of all affiliated companies participating in the intercompany pool (include NAIC Company Codes) and indication of their respective percentage shares of the pooled business?				
c. Description of the lines and types of business subject to the pooling agreement?				
d. Description of cessions to non-affiliated reinsurers of business subject to the pooling agreement, and indication of whether such cessions were prior to or subsequent to the cession of pooled business from the affiliated pool members to the lead company?				
e. Identification of all pool members that are parties to reinsurance agreements with non-affiliated reinsurers covering business subject to the pooling agreement and that have a contractual right of direct recovery from the non-affiliated reinsurer per the terms of such reinsurance agreements?				
f. Explanation of any discrepancies between entries regarding pooled business on the assumed and ceded reinsurance schedules of the lead company and corresponding entries on the assumed and ceded reinsurance schedules of other pool participants?				
g. Description of intercompany sharing, if other than in accordance with the pool participation percentage, of the Aging of Ceded (Schedule F, Part 3) and the write-off of uncollectible reinsurance?				
g. Amounts due to/from the lead entity and all affiliated entities participating in the intercompany pool as of the balance sheet date?				
h. The statement value and fair value of assets received or transferred by the reporting entity for modifications to an existing intercompany pooling arrangement that involved the transfer of assets with fair value that differ from statement value.				

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Yes	No	N/A	Comments
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### CC. Nonmonetary Transactions

☐

1. If the reporting entity engages in nonmonetary transactions, have the following been disclosed: [SSAP No. 95 par. 23]

- a. The nature of transaction?
- b. The basis of accounting for the assets transferred?
- c. Gains or losses recognized on transfers?


2. Has the reporting entity disclosed the amount of revenue and expense recognized from advertising barter transactions for each income statement period presented? [SSAP No. 95 par. 25]  
**Note:** In addition, if an entity engages in advertising barter transactions for which the fair value is not determinable within the limits of this Issue, information regarding the volume and type of advertising surrendered and received (such as the number of equivalent pages, the number of minutes, or the overall percentage of advertising volume) shall be disclosed for each income statement period presented.

### DD. Pledged or Restricted Assets

☐

1. Has the reporting entity disclosed the total combined (admitted and nonadmitted) amount of restricted assets by category, with separate identification of the admitted and nonadmitted restricted assets by category, and nature of any assets pledged to others as collateral or otherwise restricted (e.g., not under the exclusive control, assets subject to a put option contract, etc.) in the general and separate accounts by the reporting entity in comparison to total assets and total admitted assets?  
(Pursuant to SSAP No. 4, paragraph 6, all assets pledged as collateral or otherwise restricted shall be reported in this disclosure regardless if the asset is considered an admitted asset.) Disclosure includes the following restricted asset categories: [SSAP No. 1 par. 23b]

- a. Reported assets subject to contractual obligation for which liability is not shown?

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	Yes	No	N/A	Comments
b. Collateral held under security lending agreements?				
c. Assets subject to repurchase agreements?				
d. Assets subject to reverse repurchase agreements?				
e. Assets subject to dollar repurchase agreements?				
f. Assets subject to dollar reverse repurchase agreements?				
g. Assets placed under option contracts?				
h. Letter stock or securities restricted as to sale – excluding FHLB stock?				
i. FHLB capital stock?				
j. Assets on deposit with states?				
k. Assets on deposit with other regulatory bodies?				
l. Pledged as collateral to the FHLB (including assets backing funding agreements)?				
m. Assets pledged as collateral not captured in other categories?				
n. Other restricted assets?				
2. Have restricted cash and cash equivalents been included when reconciling the beginning-of-period and end-of-period total amounts shown on the statement of cash flows? [SSAP 69 par. 5]				
3. Have the amount and nature of any assets received as collateral, reflected as assets within the reporting entity's financial statements, and the recognized liability to return these collateral assets, in the general and separate accounts in comparison to total assets and admitted assets been disclosed? [SSAP No. 1 par. 23c]				
4. Have assets under collateral agreements (excluding reinsurance collateral arrangements) been admitted until an uncured default occurs? [INT 01-31 par. 7]				

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Yes	No	N/A	Comments
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#### EE. Policy Holder Dividends

1. Have the terms of dividend restrictions been disclosed, if any? [SSAP No. 65 par. 47]

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#### FF. Preoperating and Research and Development Costs and Costs of Start-Up Activities

1. Has the total amount of research and development costs charged to expense in each period for which an income statement is presented been disclosed? [SSAP No. 17 par. 5]
2. Has the cost of start-up activities incurred in the period been disclosed? [SSAP No. 76 par. 3]


#### GG. Protected Cells

1. Does the general account reflect all activities with its protected cells on the designated lines within its statutory balance sheet and income statement? [SSAP No. 74 par. 18]
2. Does the general account disclose in its notes to the financial statements the types and amounts of exposures /risks attributed to each of its protected cells? [SSAP No. 74 par. 18]


#### HH. Retrospectively Rated Contracts

1. Has the method used by the reporting entity to estimate accrued retrospective premium adjustments been disclosed? [SSAP No. 66 par. 13]
2. Have the amount of net premiums written that are subject to retrospective rating features, as well as the corresponding percentage to total net premiums written been disclosed? [SSAP No. 66 par. 13]
3. Do disclosure indicate whether accrued retrospective premiums are recorded through written premiums or as an adjustment to earned premium? [SSAP No. 66 par. 13]


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4. Has the calculation of nonadmitted retrospective premium been disclosed? [SSAP No. 66 par. 14]				
5. Have the following been disclosed with respect to medical loss ratio rebates required pursuant to the Public Health Service Act: [SSAP No. 66 par. 15]				
a. Incurred rebates?				
b. Amount paid and unpaid liabilities, segregated into individual, small group employer, large group employer, and other?				
c. The impact of reinsurance assumed, ceded and net on the total medical loss ratio rebate?				

## II. Segregated Funds Held for Others

1. Reporting entity disclose the amounts not recorded in the financial statements that represent segregated funds held for others, the nature of the assets and the related fiduciary responsibilities associated with such assets? [SSAP No. 1 par. 23a]				
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## JJ. Share-Based Payments

1. An entity with one or more share-based payment arrangements shall disclose information that enables users of the financial statement to understand all of the following [SSAP No. 104 par. 114]

a. The nature and terms of such arrangements that existed during the period and the potential effects of those arrangements on shareholders?				
b. The effect of compensation cost arising from share-based payment arrangements on the income statement?				
c. The method of estimating the fair value of the goods or services received, or the fair value of the equity instruments granted (or offered to grant), during the period?				

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	Yes	No	N/A	Comments
d. The cash flows effects resulting from share-based payment arrangements?				
2. If the reporting entity's employees participate in a plan sponsored by the holding company for which the reporting entity has no legal obligation have the following been disclosed: [SSAP No. 104 par. 125]				
a. The amount of the expense incurred?				
b. The allocation methodology utilized by the provider of such benefits?				

#### KK. Structured Settlements

1. Where an entity enters into structured settlements of periodic fixed payments to a claimant for a determinable period, or for life, for the settlement of a claim, have the following been disclosed? [SSAP No. 65 par. 19]

- a. The amount of reserves no longer carried by the insurer because it has purchased annuities with the claimant as payee and to the extent to which the insurer is contingently liable for such amounts should the issuers of the annuities fail to perform under the terms of the annuities?
- b. The name and location of the insurance company and the aggregate statement value of annuities due from any life insurer to the extent that the aggregate value of those annuities equals or exceeds 1% of policyholders' surplus?  
**Note:** Include only annuities for which the company has not obtained a release of liability from the claimant as a result of the purchase of an annuity. Also disclose the life insurers are licensed in the company's state of domicile.

#### LL. Title Insurance

1. Have the following been disclosed for each period presented: [SSAP No. 57 par. 23]

- a. The amount of the known claims reserve, Statutory Premium Reserve, (SPR/UPR), and the supplemental reserve?

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	Yes	No	N/A	Comments
b. Whether the insurer uses discounting in the calculation of its supplemental reserve, the method and rate used to determine the discount, and the amount of such discount?				
2. Have any material individual components of the reported expense categories shall be presented either on the face of the Summary of Operations or within the footnotes or related exhibits to the financial statements? [SSAP No. 57 par. 24]				

#### MM. Troubled Debt Restructuring Debtors

☐

- Has the following information been disclosed about troubled restructurings that occurred during a period for which the financial statements are presented: [SSAP No. 36 par. 20]

a. For each restructuring (or separate restructuring within a fiscal period for the same category of payables) (e.g., accounts payable or subordinated debentures) a description of the principal changes in terms, major features of settlement, or both?				
b. Aggregate gain on restructuring of payables and the related income tax effect?				
c. Aggregate net gain or loss on transfers of assets recognized during the period?				
d. For periods after a troubled debt restructuring, the extent to which amounts that are contingently payable are included in the carrying amount of restructured payables, total amounts that are contingently payable and the conditions under which those amounts would become payable or would be forgiven?				

#### NN. Uninsured Plans

☐

- Has the following been disclosed for an ASO Plan, with regard to the profitability to the reporting entity of all ASO accident and health plans and the uninsured portions of partially insured plans for which the reporting entity serves as an administrator: [SSAP No. 47 par. 13a]

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	Yes	No	N/A	Comments
a. For the total and each category separately provided:				
1) Net reimbursement for administrative expenses in excess of actual expenses (including administrative fees) in excess of actual expenses?				
2) Total net other income or expense (including interest paid to or received from plans)?				
3) Total net gain or loss from operations?				
4) The claim payment volume?				
2. Has the following been disclosed for an ASC plan with regard to the profitability to the reporting entity of all ASC accident and health plans and the uninsured portions of partially insured plans for which the reporting entity serves as an administrator: [SSAP No. 47 par. 13b]				
b. For the total and each category separately provided:				
1) Gross reimbursement for medical cost incurred?				
2) Gross administrative fees accrued?				
3) Other income or expense (including interest paid to or received from plans)?				
4) Gross expenses incurred (claims and administrative)?				
5) Total net gain or loss from operations?				
3. Has the following been disclosed for a Medicare or similarly structured cost based reimbursement contracts plan: [SSAP No. 47 par. 13c]				
a. Does the information include:				
1) Major components of revenue by payor?				



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	Yes	No	N/A	Comments
2) Receivables from payors with account balances the greater of 10% of gross amounts receivable relating to uninsured accident and health plans or \$10,000?				
3) Recorded allowances and reserves for adjustment of recorded revenues?				
4) Adjustments to revenue resulting from audit of receivables related to revenues recorded in the prior period?				

**Retirement Plans, Deferred Compensation, Postemployment Benefits and Compensated Absences and Other Postretirement Benefit Plans**

**Postemployment Benefits and Compensated Absences**

- a. If it is not practicable to estimate, and therefore, not accrue the liability under paragraph 5 of SSAP No. 11, that fact and the reasons therefore are disclosed in the financial statements [SSAP No. 11 par.18]


**OO. Defined Benefit Pension Plans – Single Employer Defined Benefit Plans**

1. For an employer that sponsors one or more defined benefit pension plans or one or more other defined benefit postretirement plans shall provide the following information, separately for pension plans and other postretirement benefit plans, are the following disclosed: [SSAP No. 102 par.68]

- a. A reconciliation of beginning and ending balances of the projected benefit obligation showing separately, if applicable, the effects during the period attributable to each of the following:

- 1) Service cost?  
2) Interest cost?  
3) Contributions by plan participants?  
4) Actuarial gains and losses?  
5) Foreign currency exchange rate changes?


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	Yes	No	N/A	Comments
6) Benefits paid?				
7) Plan amendments?				
8) Business combinations, divestitures, curtailments, settlements, and special termination benefits?				
b. A reconciliation of beginning and ending balances of the fair value of plan assets showing separately, if applicable, the effects during the period attributable to each of the following:				
1) Actual return on plan assets?				
2) Foreign currency exchange rate changes?				
3) Contributions by the employer?				
4) Contributions by plan participants?				
5) Benefits paid?				
6) Business combinations, divestitures, and settlements?				
c. The funded status of the plans and the amounts recognized in the statement of financial position, showing separately the assets and liabilities recognized.				
d. In order to provide the users of the financial statements with an understanding of 1) how investment allocation decisions are made, including the factors that are pertinent to and understanding of investment policies and strategies, 2) the classes of plan assets, 3) the inputs and valuation techniques used to measure fair value of plan assets, 4) the effect of fair value measurements using significant unobservable inputs (Level 3) on changes in plan assets for the period, and 5) significant concentrations of risk within plan assets, has the following information about plan assets been provided:				
1) A narrative description of investment policies and strategies, including:				

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	Yes	No	N/A	Comments
i. Target allocation percentages or range of percentages considering the classes of plan assets disclosed pursuant to ii) below, as of the latest statement of financial position presented (on a weighted-average basis for employers with more than one plan)?				
ii. Other factors that are pertinent to an understanding of those policies and strategies such as investment goals, risk management practices, permitted and prohibited investments including the use of derivatives, diversification, and the relationship between plan assets and benefit obligations. For investment funds disclosed as classes as described in ii) below, a description of the significant investment strategies of those funds shall be provided?				
2) The fair value of each class of plan assets as of each date for which a statement of financial position is presented. Asset classes shall be based on the nature and risks of assets in an employer's plan(s). Examples of classes of assets could include, but are not limited to, the following:				
i. Cash and cash equivalents?				
ii. Equity securities (segregated by industry type, company size, or investment objective)?				
iii. Debt securities issued by national, state and local governments?				
iv. Corporate debt securities?				
v. Asset-backed securities?				
vi. Structured debt?				
vii. Derivatives on a gross basis (segregated by type of underlying risk in the contract, for example, interest rate contracts, foreign exchange contracts, equity contracts, commodity contracts, credit contracts, and other contracts)?				

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	Yes	No	N/A	Comments
viii. Investment funds (segregated by type of fund)?				
ix. Real estate?				
x. Any additional classes of plan assets or further disaggregation of classes that should be disclosed in accordance with the objectives in e (SSAP No. 102 par. 68.d)?				
3) A narrative description of the basis used to determine the overall expected long-term rate-of-return-on-assets assumption, such as the general approach used, the extent to which the overall rate-of-return-on-assets assumption was based on historical returns, the extent to which adjustments were made to those historical returns in order to reflect expectations of future returns, and how those adjustments were determined. The description should consider the classes of assets described in ii) above, as appropriate?				
4) Information that enables users of financial statements to assess the inputs and valuation techniques used to develop fair value measurements of plan assets at the reporting date? For fair value measurements using significant unobservable inputs, is the effect of the measurements on changes in plan assets for the period disclosed? To meet these objectives, is the following information disclosed for each class of plan assets pursuant to ii) above for each annual period?				
i. The level within the fair value hierarchy in which the fair value measurements in their entirety fall, segregating fair value measurements using quoted prices in active markets for identical assets or liabilities (Level 1), significant other observable inputs (Level 2), and significant unobservable inputs (Level 3)?				

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	Yes	No	N/A	Comments
ii. Information about the valuation technique(s) and inputs used to measure fair value and a discussion of changes in valuation techniques and inputs, if any, during the period.				
e. For defined benefit pension plans, the accumulated benefit obligation.				
f. The benefits (as of the date of the latest statement of financial position presented) expected to be paid in each of the next five fiscal years, and in the aggregate for the five fiscal years thereafter?				
1) Are the expected benefits estimated based on the same assumptions used to measure the company's benefit obligation at the end of the year?				
2) Does the estimate include benefits attributable to estimated future employee service?				
g. The employer's best estimate, as soon as it can reasonably be determined, of contributions expected to be paid to the plan during the next fiscal year beginning after the date of the latest statement of financial position presented? <b>Note:</b> Estimated contributions may be presented in the aggregate combining (1) contributions required by funding regulations or laws, (2) discretionary contributions, and (3) noncash contributions.				
h. The amount of net benefit cost recognized, shown separately for each of the following components:				
1) Service cost component?				
2) Interest cost component?				
3) Expected return on plan assets for the period?				
4) Gain or loss component?				
5) Prior service cost or credit component?				

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	Yes	No	N/A	Comments
6) Transition asset or obligation component?				
7) Gain or loss recognized due to settlements or curtailments?				
i. Separately the net gain or loss and net prior service cost or credit recognized in unassigned funds (surplus) for the period pursuant to SSAP No. 102 par. 15 and 19, and reclassification adjustments of unassigned funds (surplus) for the period, as those amounts, including amortization of the net transition asset or obligation, are recognized as components of net periodic benefit cost?				
j. The amounts in unassigned funds (surplus) that have not yet been recognized as components of net periodic benefit cost, including:				
1) Net gain or loss?				
2) Net prior service cost or credit?				
3) Net transition or obligation?				
k. On a weighted-average basis, the following assumptions used in the accounting for the plans:				
1) Discount rates?				
2) Rates of compensation increase (for pay-related plans)?				
3) Expected long-term rates of return on plan assets specifying, in a tabular format, the assumptions used to determine the benefit obligation and the assumptions used to determine net benefit cost, and interest crediting rates (for cash balance plans and other plans with promised crediting rates)?				
l. If applicable, are the following disclosed:				
1) The amounts and types of securities of the employer and related parties included in plan assets?				

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m. If applicable, any alternative method used to amortize prior service amounts or net gains and losses pursuant to SSAP No. 102 par. 16 and 23.				
n. If applicable, any substantive commitment, such as past practice or a history of regular benefit increases, used as the basis for accounting for the benefit obligation.				
o. If applicable, the cost of providing special or contractual termination benefits recognized during the period and a description of the nature of the event?				
p. An explanation of the following information:				
i. The reasons for significant gains and losses related to changes in the defined benefit obligation for the period.				
ii. Any other significant change in the benefit obligation or plan assets not otherwise apparent in the other disclosures required by this statement. NN				
2. If an alternative approach that more rapidly amortizes the cost of retroactive amendments is used has the alternative method been disclosed? [SSAP No. 102 par. 16]				
3. If a method of amortizing gains and losses is used in lieu of the minimum described in paragraph 22 of SSAP No. 102, has such method been disclosed? [SSAP No. 102 par. 23]				
4. If the employer has a present commitment to make future amendments and that the substance of the plan is to provide benefits attributable to prior service that are greater than the benefits defined by the written terms of the plan, has the existence and nature of the commitment to make future amendments been disclosed? [SSAP No. 102 par. 30-31]				

**PP. Defined Benefit Pension Plans – Employers with Two or More Defined Benefit Plans**

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	Yes	No	N/A	Comments
1. For employer's defined benefit pension plans, and for all other defined benefit postretirement plans, where disclosures required by SSAP No. 102 par. 70(section NN above), are aggregated, are the following presented [SSAP No. 102 par. 69] : <b>Note:</b> Disclosures shall be as of the date of each statement of financial position presented. Disclosures about pension plans with assets in excess of the accumulated benefit obligation generally may be aggregated with disclosures about pension plans with accumulated benefit obligations in excess of assets. The same aggregation is permitted for other postretirement benefit plans. If aggregate disclosures are presented, an employer shall disclose, as of the date of each financial statement position presented:				
a. The projected benefit obligation and fair value of plan assets for plans with projected benefit obligations in excess of plan assets?				
b. The accumulated benefit obligation and fair value of plan assets for pension plans with accumulated benefit obligations in excess of plan assets?				
2. For U.S. reporting entities with benefit obligations of the plan outside the U.S. that are significant relative to the total benefit obligation, and those plans use significantly different assumptions, are the disclosures separated between outside the United States, and U.S. plans? [SSAP No. 102 par.70]				

**QQ. Defined Contribution Plan**

☐

1. For defined contribution pension plans and/or other defined contribution postretirement benefit plans, has the employer disclosed the following for all periods [SSAP No. 102 par.75]
- a. Amount of cost recognized (separately from amount of cost recognized for defined benefit plans)?
- b. A description of the nature and effect of any significant changes during the period affecting comparability, such as a change in the rate of employer contributions, a business combination, or a divestiture?




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**Yes      No      N/A      Comments**

**RR. Multi-Employer Plan**

1. For multiemployer plans, had the following been disclosed for each annual period for which a statement of income is presented [SSAP No. 102 par.79]:
  - a. Amount of contributions?
  - b. A description of the nature and effect of any significant changes during the period affecting comparability, such as a change in the rate of employer contributions, a business combination, or a divestiture?
  - c. Identification whether the contributions represent more than 5% of total contributions to the plan as indicated in the plan's most recently available annual report?
2. Has the following been disclosed [SSAP No. 102 par.80]:
  - a. Whether a funding improvement plan or rehabilitation plan had been implemented or is pending?
  - b. Whether the reporting entity paid a surcharge to the plan?
  - c. A description of minimum contributions required for future periods, if applicable?
  - d. A qualitative description of the extent to which the employer could be responsible for the obligations of the plan, including benefits earned by employees during employment with another employer?


**SS. Postretirement Plans**

1. Has an employer that sponsors one or more other defined benefit postretirement plans provided the following information for postretirement benefit plans other than pensions: [SSAP No. 92 par. 66]:

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- a. A reconciliation of beginning and ending balances of the benefit obligation showing separately, if applicable, the effects during the period attributable to each of the following: [SSAP No. 92 par. 66(a)]

Yes No N/A Comments

- 1) Service cost?
- 2) Interest cost?
- 3) Contributions by plan participants?
- 4) Actuarial gains and losses?
- 5) Foreign currency exchange rate changes?
- 6) Benefits paid?
- 7) Plan amendments?
- 8) Business combinations?
- 9) Divestitures?
- 10) Curtailments?
- 11) Settlements?
- 12) Special termination benefits?


- b. A reconciliation of beginning and ending balances of the fair value of plan assets showing separately, if applicable, the effects during the period attributable to each of the following: [SSAP No. 92 par. 66(b)]

- 1) Actual return on plan assets
- 2) Foreign currency exchange rate changes?
- 3) Contributions by the employer?
- 4) Contributions by plan participants?
- 5) Benefits paid?
- 6) Business combinations?
- 7) Divestitures?


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	Yes	No	N/A	Comments
8) Settlements?				
c. The funded status of the plans and the amounts recognized in the statement of financial position, showing separately the assets (nonadmitted) and liabilities recognized. [SSAP No. 92 par. 66(c)]				
d. The objectives of the disclosures about postretirement benefit plan assets are to provide users of financial statements with an understanding of (i) how investment allocation decisions are made, including the factors that are pertinent to an understanding of investment policies and strategies, (ii) the classes of plan assets, (iii) the inputs and valuation techniques used to measure the fair value of plan assets, (iv) The effect of fair value measurements using significant unobservable inputs (Level 3) on changes in plan assets for the period, and (v) significant concentrations of risk within plan assets. Has the employer considered those overall objectives in providing the following information about plan assets [SSAP No. 92 par. 66(d)]				
1) A narrative description of investment policies and strategies, including target allocation percentages or range of percentages considering the classes of plan assets disclosed pursuant to 2) below, as of the latest statement of financial position presented (on a weighted-average basis for employers with more than one plan), and other factors that are pertinent to an understanding of those policies and strategies such as investment goals, risk management practices, permitted and prohibited investments including the use of derivatives, diversification, and the relationship between plan assets and benefit obligations. For investment funds disclosed as classes as described in 2) below, a description of the significant investment strategies of those funds shall be provided.				

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2) The fair value of each class of plan assets as of each date for which a statement of financial position is presented. Note: Asset classes shall be based on the nature and risks of assets in an employer's plan(s). Examples of classes of assets include, but are not limited to, the following: cash and cash equivalents; equity securities, (segregated by industry type, company size, or investment objective); debt securities, issued by national, state, and local governments; corporate debt securities; asset backed securities; structured debt; derivatives on a gross basis (segregated by type of underlying risk in the contract, for example, interest rate contracts, foreign exchange contracts, equity contracts, commodity contracts, credit contracts, and other contracts); investment funds (segregated by type of fund); and real estate. Those examples are not meant to be all inclusive. An employer should consider the overall objectives in paragraph 66.d. in determining whether additional classes of plan assets or further disaggregation of classes should be disclosed.				
3) A narrative description of the basis used to determine the overall expected long-term rate-of-return-on-assets assumption, such as the general approach used, the extent to which the overall rate-of-return-on-assets assumption was based on historical returns, the extent to which adjustments were made to those historical returns in order to reflect expectations of future returns, and how those adjustments were determined. The description should consider the classes of assets described in 2) above, as appropriate.				
4) For each annual period, the employer shall disclose the following information about fair value measurement for each class of plan assets disclosed:				

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i. The level within the fair value hierarchy in which the fair value measurements in their entirety fall, segregating fair value measurements using quoted prices in active markets for identical assets or liabilities (Level 1), significant other observable inputs (Level 2), and significant unobservable inputs (Level 3)				
ii. Information about the valuation technique(s) and inputs used to measure fair value and a discussion of changes in valuation techniques and inputs, if any, during the period.				
e. The benefits (as of the date of the latest statement of financial position presented) expected to be paid in each of the next five fiscal years, and in the aggregate for the five fiscal years thereafter. The expected benefits should be estimated based on the same assumptions used to measure the company's benefit obligation at the end of the year and should include benefits attributable to estimated future employee service [SSAP No. 92 par. 66(e)]				
f. The employer's best estimate, as soon as it can reasonably be determined, of contributions expected to be paid to the plan during the next fiscal year beginning after the date of the latest statement of financial position presented. Estimated contributions may be presented in the aggregate combining (1) contributions required by funding regulations or laws, (2) discretionary contributions, and (3) noncash contributions [SSAP No. 92 par. 66(f)].				
g. The amount of net periodic benefit cost recognized, showing separately the service cost component, the interest cost component, the expected return on plan assets for the period, the gain or loss component, the prior service cost or credit component, the transition asset or obligation component, and the gain or loss recognized due to settlements or curtailments [SSAP No. 92 par. 66(g)].				

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h. Separately the net gain or loss and net prior service cost or credit recognized in unassigned funds (surplus) for the period pursuant to paragraphs 42 and 46, and reclassification adjustments of unassigned funds (surplus) for the period, as those amounts, including amortization of the net transition asset or obligation, are recognized as components of net periodic benefit cost [SSAP No. 92 par. 66(h)].				
i. The amounts in unassigned funds (surplus) that have not yet been recognized as components of net periodic benefit cost, showing separately the net gain or loss, net prior service cost or credit, and net transition asset or obligation [SSAP No. 92 par. 66(i)].				
j. On a weighted-average basis, the following assumptions used in the accounting for the plans: discount rates, rates of compensation increase (for pay-related plans), and expected long-term rates of return on plan assets specifying, in a tabular format, the assumptions used to determine the benefit obligation and the assumptions used to determine net benefit cost and interest crediting rates (for cash balance plans and other plans with promised interest crediting rates) [SSAP No. 92 par. 66(j)].				
k. The assumed health care cost trend rate(s) for the next year used to measure the expected cost of benefits covered by the plan (gross eligible charges), and a general description of the direction and pattern of change in the assumed trend rates thereafter, together with the ultimate trend rate(s) and when that rate is expected to be achieved [SSAP No. 92 par. 66(k)].				
l. If applicable, the amounts and types of securities of the employer and related parties included in plan assets [SSAP No. 92 par. 66(l)].				
m. If applicable, any alternative method used to amortize prior service amounts or net gains and losses pursuant to paragraphs 43 and 50 [SSAP No. 92 par. 66(m)].				

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n. If applicable, any substantive commitment, such as past practice or a history of regular benefit increases, used as the basis for accounting for the benefit obligation [SSAP No. 92 par. 66(n)].				
o. If applicable, the cost of providing special or contractual termination benefits recognized during the period and a description of the nature of the event [SSAP No. 92 par. 66(o)].				
p. An explanation of the following information: [SSAP No. 92 par. 66(p)].				
i. The reasons for significant gains and losses related to changes in the deferred benefit obligation for the period.				
ii. Any other significant change in the benefit obligation or plan assets not otherwise apparent in the other required disclosures.				
2. As a result of the Medicare Modernization Act, if an employer is unable to determine whether benefits provided by its plan are actuarially equivalent to Medicare Part D, has it disclosed the following: [INT 04-17 par. 8]				
a. The existence of the Act?				
b. The fact that measures of the APBO or net periodic postretirement benefit cost do not reflect any amount associated with the subsidy because the employer is unable to conclude whether the benefits provided by the plan are actuarially equivalent to Medicare Part D under the Act?				
3. In the first period in which an employer includes the effects of the subsidy from the Medicare Modernization Act in measuring the net postretirement benefit costs, has it disclosed the following: [INT 04-17 par. 9]				
a. The reduction in the net postretirement benefit cost for the subsidy related to benefits attributed to former employees?				
b. The effect of the subsidy on the measurement of net periodic postretirement benefit cost for the current period, including:				

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i. Any amortization of the actuarial experience gain in (a) as a component of the net amortization called for by paragraph 49 of SSAP No. 92?				
ii. The reduction in current period service cost due to the subsidy?				
iii. The resulting reduction in interest cost on the net postretirement benefit cost as a result of the subsidy?				
c. Any other disclosures required by paragraph 66(p) of SSAP No. 92 which requires disclosure of "An explanation of any significant change in the benefit obligation or plan assets not otherwise apparent in the other disclosures required by this statement."?				
4. For purposes of the reconciliation of beginning and ending balances of the net benefit obligation and the effect of the Medicare Modernization Act has the gross benefit payments (paid and expected, respectively), including prescription drug benefits, and separately the gross amount of the subsidy receipts (received and expected, respectively) been disclosed? [INT 04-17 par. 10]				
5. For employers with two or more defined benefit plans, if aggregate disclosures are presented, has the accumulated benefit obligation and fair value of plan assets for plans with accumulated benefit obligations in excess of plan assets been disclosed as of each statement of financial position presented? [SSAP No. 92 par. 69]				
6. For employers with two or more defined benefit plans, for U.S. reporting entities with benefit obligations of the plan outside the U.S. that are significant relative to the total benefit obligation, and those plans use significantly different assumptions, are the disclosures separated between outside the United States, and U.S. plans? [SSAP No. 92 par.70]				
7. For multiemployer plans, had the following been disclosed for each annual period for which a statement of income is presented [SSAP No. 92 par. 75-76]:				



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	Yes	No	N/A	Comments
a. Amount of contributions? <b>Note:</b> A reporting entity may disclose total contributions to multiemployer plans without disaggregating the amounts attributable to pension plans and other postretirement benefit plans.				
b. A description of the nature and effect of any significant changes during the period affecting comparability, such as a change in the rate of employer contributions, a business combination, or a divestiture? Does this disclosure identify whether the contributions represent more than 5% of total contributions to the plan as indicated in the plan's most recently available annual report?				
a. Whether a funding improvement plan or rehabilitation plan had been implemented or is pending.				
c. Whether the reporting entity paid a surcharge to the plan.				
d. A description of minimum contributions required for future periods, if applicable.				
e. A qualitative description of the extent to which the employer could be responsible for the obligations of the plan, including benefits earned by employees during employment with another employer.				
8. If it is either probable or reasonably possible that (a) an employer would withdraw from the plan under circumstances that would give rise to an obligation or (b) an employer's contribution to the fund would be increased during the remainder of the contract period to make up a shortfall in the funds necessary to maintain the negotiated level of benefit coverage (a "maintenance of benefits" clause), were the provisions and disclosures of SSAP No. 5 applied? [SSAP No. 92, par.74]				
9. Has the following been disclosed for defined contribution postretirement benefit plans: [SSAP No. 92 par. 99]:				
a. Amount of contributions?				

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	Yes	No	N/A	Comments
b. A description of the nature and effect of any significant changes during the period affecting comparability, such as a change in the rate of employer contributions, a business combination, or a divestiture?				

10. Has the following been disclosed for consolidated/holding company plans: [SSAP No. 92 par. 101]:

a. The fact that the employees of the reporting entity participate in a plan sponsored by the holding company for which the reporting entity has no legal obligation?				
b. The amount of the postretirement benefit expense incurred?				
c. The allocation methodology utilized by the provider of such benefits?				

#### TT. Investments in Tax Credit Structures

1. Are liabilities or loss contingencies recognized for future contributions which result in additional tax credits reported as "Payable for Securities" until remitted or until the obligation is otherwise eliminated? [SSAP No. 93 par. 22]				
2. If a commitment to provide future contributions is not required to be recognized, has the commitment been disclosed in the notes to the financial statements with other commitments? [SSAP No. 93 par. 23]				
3. Has information been disclosed that enables users of the financial statements to understand the following information about the investments in projects that generate tax credits and other tax benefits from tax programs captured in scope of this statement: [SSAP No. 93 par. 23]				
a. The nature of the investments in projects that generate tax credits and other tax benefits?				
b. The effect of the recognition and measurement of the investments in projects that generate tax credits and other tax benefits and the related tax credits on the financial position and results of operations?				

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	Yes	No	N/A	Comments
4. Has the reporting entity disclosed the following information about its investments in projects that generate tax credits and other tax benefits from a tax credit program in scope of this statement [SSAP No. 93 par. 31]:				
a. The amount of tax credits and other tax benefits recognized during the reporting period(s)?				
b. The balance of the investments recognized in the statement of financial position for the reporting period(s) presented?				
c. The amount of investment amortization and non-income tax related activity recognized as a component of net investment income, and other returns allocated that were recognized outside of income tax expense?				
d. An aggregate schedule of tax credits expected to be generated each year for the subsequent five years and thereafter, disaggregated by transferable/certificated and non-transferable?				
e. Any commitment or contingent commitment (e.g., guarantees or commitments to provide additional capital contributions) including the amount of contributions that are contingent commitments related to tax credit investments and the year(s) that contingent commitments are expected to be paid?				
5. If applicable to tax credit investments, have the following disclosures been made [SSAP No. 93 par. 32]?				
a. If the underlying project is currently subject to any regulatory reviews and the status of such review? (Example: Investigations by the housing authority.)				
b. Significant modifications or events that resulted in a change in the nature of the investment or a change in the relationship with the underlying project for investments in scope?				
6. If a reporting entity recognizes an impairment loss, have the following disclosures been made in the financial statements that include the period of the impairment write-down? [SSAP No. 93 par. 33]				
a. A description of the impaired assets and the facts and circumstances leading to the impairment?				
b. The amount of the impairment and how fair value was determined?				

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	Yes	No	N/A	Comments
7. Only for the tax credits allocated from tax credit investments and that are unused as of the reporting period, have the following disclosures been made: <b>(Note:</b> For purposes of this disclosure, total unused tax credits represent the entire amount of tax credits available) [SSAP No. 93 par. 34]				
a. Carrying value of tax credits, disaggregated by transferable/certificated and nontransferable, gross of any related tax liabilities by jurisdiction and in total?				
b. Total unused tax credits by jurisdiction, disaggregated by transferable/certificated and nontransferable?				
c. Method of estimating utilization of remaining tax credits or other projected recovery of the current carrying value?				
d. Impairment amount recognized in the reporting period(s), if any?				
e. Identify tax credits by transferable/certificated and non-transferable classifications and identify the admitted and nonadmitted portions of each classification?				

#### UU.State and Federal Tax Credits

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1. For unused tax credits, do disclosures include the following:  
**Note:** For purposes of this disclosure, total unused tax credits represent the entire amount of tax credits available. [SSAP No. 94 par. 17]

a. Carrying value of tax credits, disaggregated by transferable/certificated and nontransferable, gross of any related tax liabilities by jurisdiction and in total?				
b. Total unused tax credits by jurisdiction, disaggregated by transferable/certificated and nontransferable.				
c. Method of estimating utilization of remaining tax credits or other projected recovery of the current carrying value?				
d. Impairment amount recognized in the reporting period, if any?				

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	Yes	No	N/A	Comments
e. Identify tax credits by transferable/certificated and non-transferable classifications and identify the admitted and nonadmitted portions of each classification?				
f. Has any commitment or contingent commitment to purchase tax credits been disclosed?				

## VV. Financial Guarantee Insurance

1. Did the reporting entity disclose information that enables users of its financial statements to understand the factors affecting the present and future recognition and measurement of financial guarantee insurance contracts? [SSAP No. 60 par. 15-16]

a. For financial guarantee insurance contracts where premiums are received as installment payments over the period of the contract, rather than at inception:				
1) The unearned premium revenue as of the reporting date, in proportion with the amount and expected coverage period of the insured risk, which would have been reflected if the premium had been received at inception. <b>Note:</b> If desired, a reporting entity that follows FAS 163 for GAAP may elect to report this disclosure in accordance with the revenue recognition principles of FAS 163.				
b. A schedule of premiums (undiscounted) expected to be collected under all installment contracts detailing the following:				

- 1) The four quarters of the subsequent annual period and each of the next four annual periods.

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- 2) The remaining periods aggregated in five-year increments.

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- c. A rollforward of the expected future premiums (undiscounted), including:

- 1) Expected future premiums - Beginning of Year

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	Yes	No	N/A	Comments
2) Less - Premium payments received for existing installment contracts				
3) Add - Expected premium payments for new installment contracts				
4) Adjustments to the expected future premium payments				
5) Expected future premiums - End of Year				
d. For non-installment contracts for which premium revenue recognition has been accelerated, the amount and reasons for acceleration.				
e. A schedule of the future expected earned premium revenue on non-installment contracts as of the latest date of the statement of financial position detailing the following:				
1) The four quarters of the subsequent annual period and each of the next four annual periods				
2) The remaining periods aggregated in five year increments				
f. For the claim liability: <b>Note:</b> The reference to "claim liability" throughout the disclosure requirements shall reflect the "reserves for unpaid losses and loss adjustment expenses" from paragraphs 7 and 8 of this Statement.				
1) The rate used to discount the claim liability. This rate shall equal the average rate of return on the admitted assets of the financial guaranty insurer as of the annual date of the computation of the reserve <b>Note:</b> The annual discount rate calculated pursuant to this paragraph shall be utilized for the subsequent year's quarterly financial statements. Per paragraph 8, the discount rate shall be adjusted at the end of each year.				

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2) The significant component(s) of the change in the claim liability for the period (the accretion of the discount on the claim liability, changes in the timing, establishment of new reserves for defaults of insured contracts, changes or establishment of deficiency reserves, and changes or establishment of reserves for incurred but not reported claims), and the amount relating to each component(s).				
g. A description of the insurance enterprise's risk management activities used to track and monitor deteriorating insured financial obligations, including the following:				
1) A description of each grouping or category used to track and monitor deteriorating insured financial obligations				
2) The insurance enterprise's policies for placing an insured financial obligation in, and monitoring, each grouping or category				
3) The insurance enterprise's policies for avoiding or mitigating claim liabilities, the related expense and liability reported during the period for those risk mitigation activities (not including reinsurance), and a description of where that expense and that liability are reported in the statement of income and the statement of financial position, respectively.				
3. Did the insurance enterprise disclose the following information for each annual and interim period related to the claim liability [SSAP No. 60, Par. 17]				
a. A schedule of insured financial obligations at the end of each interim period detailing, at a minimum, the following for each category or grouping of these financial obligations (see Appendix A):				
a. Number of issued and outstanding financial guarantee insurance contract				

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	Yes	No	N/A	Comments
b. Remaining weighted-average contract period <b>Note:</b> Weighted average contract period shall be based on management's estimate of the weighted average life of the contracts. If desired, a reporting entity that follows FAS 163 for GAAP may elect to mirror the time period calculated under FAS 163.				
c. Insured contractual payments outstanding, segregating principal and interest <b>Note:</b> Contractual payments outstanding shall be based on management's estimates of receivables. If desired, a reporting entity that follows FAS 163 for GAAP may elect to mirror the time period calculated under FAS 163.				
d. Gross claim liability <b>Note:</b> Represents the unpaid losses and loss adjustment expenses calculated in accordance with SSAP No. 55 and SSAP No. 60, but excluding the effects of subrogation recoveries, ceded reinsurance and discounting.				
e. Gross potential recoveries <b>Note:</b> Includes (a) subrogation recoveries, which are deducted from the gross claim liabilities in accordance with paragraph 15 of SSAP No. 55 and (b) ceded reinsurance recoveries on unpaid losses, which are deducted from the gross claim liability in accordance with paragraph 126.a. of SSAP No. 62.				
f. Discount, net (both claim liability and potential recoveries) <b>Note:</b> Represents the discounting effect of the gross claim liability, subrogation recoveries, and reinsurance recoveries.				
g. Net claim liability <b>Note:</b> Represents the gross claim liability less gross potential recoveries and the net discount. This line should reconcile to the sum of line 10, column 8 and column 9 (financial guaranty net unpaid losses and net unpaid loss adjustment expenses) of the Underwriting and Investment Exhibit, Part 2a - Unpaid Losses and Loss Adjustment Expenses.				



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	Yes	No	N/A	Comments
h. Reinsurance recoverables <b>Note:</b> Represents reinsurance recoverables on paid losses which is reported as an asset with paragraph 24 of SSAP No. 62. This line should reconcile to "Amounts recoverable from reinsurers" on the balance sheet.				
i. Unearned premium revenue <b>Note:</b> Unearned premium revenue (UPR) should be consistent with the UPR measurement principles of SSAP No. 60. UPR reported in this schedule may not reconcile to line 10, column 5 of the Underwriting and Investment Exhibit, Part 1a - Recapitulation of all Premiums. To the extent that this amount does not reconcile to line 10, column 5 of the Underwriting and Investment Exhibit, Part 1a - Recapitulation of Premiums, provide an additional reconciliation to line 10, column 5 of the Underwriting and Investment Exhibit, Part 1a in a footnote to the tabular disclosures required in paragraph 17.				

**WW. Offsetting and Netting of Assets and Liabilities**

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1. Has the following been disclosed (separately for assets and liabilities) when derivative, repurchase and reverse repurchase, and securities borrowing and securities lending assets and liabilities are offset and reported net:[SSAP No. 64 par. 6]

- a. The gross amounts of recognized assets and recognized liabilities?
- b. The amounts offset?
- c. The net amounts presented in the statement of financial positions?


**XX. Multiple Peril Crop Insurance**

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1. Has the reporting entity disclosed the method used to compute the unearned premium reserve? [SSAP No. 78 par. 10]

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	Yes	No	N/A	Comments
2. Has the reporting entity disclosed separately the amounts received and recorded as (1) a reduction of loss expenses (catastrophic coverage) and (2) a reduction of underwriting expense (buy-up coverage)? [SSAP No. 78 par. 15]				

**YY. Subprime Mortgage Related Risk Exposure**

1. Reporting entities shall provide the following information: [SSAP No. 1 par 31]

- a. A narrative description of the manner in which the reporting entity specifically defines its exposure to subprime mortgage related risk in practice. Disclose the general categories of information considered in determining exposure to subprime mortgage related risk. Differentiation should be made between exposure to unrealized losses due to changes in asset values versus exposure to realized losses resulting from receiving less than anticipated cash flows or due to potential sale of assets to meet future cash flow requirements. Risk management or mitigation strategies shall also be disclosed.
- b. Direct exposure through investments in subprime mortgage loans. Disclose the following information for the aggregate amount of directly held subprime mortgage loans: book adjusted carrying value (excluding accrued interest); fair value; value of land and buildings; any other-than-temporary impairment losses recognized to date; default rate for the subprime portion of the loan portfolio. This information shall be segregated by the categories of Mortgages in the Process of Foreclosure, Mortgages in Good Standing and Mortgages with Restructured Terms.


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	Yes	No	N/A	Comments
c. Direct exposure through other investments. Reporting entities shall consider subprime mortgage related risk exposure through other investments and aggregated by the below investment types, reporting entities shall disclose the following – actual cost, book adjusted carrying value, fair value, any other-than-temporary impairment losses recognized to date for the following types of investments:				
i. Residential mortgage backed securities				
ii. Commercial mortgage backed securities				
iii. Collateralized debt obligations				
iv. Structured securities (including principal protected notes)				
v. Equity investments in subsidiary, controlled or affiliated entities with significant subprime mortgage related risk exposure (a general description of the nature and extent of the SCAs exposure should be included)				
vi. Other assets (including but not limited to hedge funds, credit default swaps, special investment vehicles)				
d. Underwriting exposure to subprime mortgage risk through Mortgage Guaranty or Financial Guaranty insurance coverage. Disclose the following information, by coverage type, related to underwriting exposure on policies issued for Mortgage Guaranty coverage or Financial Guaranty coverage and any other lines of insurance expected to be impacted: the aggregate amount of subprime related losses paid in the current year; the aggregate amount of subprime related losses incurred in the current year; the aggregate amount of subprime related case reserves at the end of the current period; the aggregate amount of subprime related IBNR reserves at the end of the current period.				

**LIFE AND HEALTH DISCLOSURES (Disclosures specific to Life and Health entities)**

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	Yes	No	N/A	Comments
<b>A. Life Contracts</b>			<div></div>	

1. For life and annuity reserves, has the following been disclosed in the financial statements: [SSAP No. 51 par. 45]

a. A description of reserve practices concerning the following:

- i. Waiver of deduction of deferred fractional premiums upon death of insured?
- ii. Return of portion of final premium for periods beyond the date of death?
- iii. Amount of any surrender value promised in excess of the reserve as legally computed?


b. The methods employed in the valuation of substandard policies?

a. The amount of insurance, if any, for which the gross premiums are less than the net premiums according to the valuation standards?

b. The method used to determine the following: [SSAP No. 51 par. 45 (d)]

- i. Tabular interest?
- ii. Tabular less actual reserves released?
- iii. Tabular cost (by formula or from the basic data for such items)?


c. The nature of significant other reserve changes?

2. For the disclosures noted below, has the amount of annuity actuarial reserves and deposit liabilities by withdrawal characteristics for the categories of general account, separate account with guarantees, separate account nonguaranteed as well as the total percentage of the total, include a separate section for individual Annuities, Group Annuities, and Deposit-Type Contracts (with no life contingencies) been disclosed as follows: [SSAP No. 51 par. 46]. Supplementary contracts with life contingencies are reported in the appropriate Annuities section (Individual or Group).

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a. Subject to discretionary withdrawal:

Yes No N/A Comments

i. With market value adjustment, where withdrawal of funds is payable at all times, or prior to specified maturity dates where such dates are more than one year after the statement date and;

(a) In a lump sum with adjustments to reflect general changes in interest rates, or asset values since receipt of funds by the insurer;

(b) In installments over five years or more, with or without a reduction in the interest rate during the instalment period;

ii. At book value less current surrender charge, where the withdrawal of funds is payable at all times or at any time within one year from the statement date in a lump sum object to a current fixed surrender charge of 5% or more and it does not contain a meaningful bail out rate as described in SSAP No. 51 par. 46 (a) (v.(d))?

iii. At fair value, where the withdrawal of funds is payable at current market value of the assets supporting the liabilities, the assets are stated at current market value, and the liabilities are stated at the current market value or per unit value of the assets supporting the liabilities?

**Note:** These liabilities are for contracts where the customer bears the entire investment risk.

iv. Total with adjustment or at market value?

v. At book value without adjustment (minimal or no charge or adjustment), where the withdrawal of funds is either payable at all times, or at any time (including a withdrawal on a scheduled payment date) within one year from the statement date and:

(a) In a lump sum without adjustment?


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	Yes	No	N/A	Comments
(b) In instalments over less than five years, with or without a reduction in interest rate during the installment period?				
(c) In a lump sum subject to a fixed surrender charge of less than 5%?				
(d) In a lump sum subject to a surrender charge, but such charge is waived if the credited rate falls below a specified "bail out" rate and the "bail out" rate is more than the maximum statutory valuation rate for the life insurance policies for more than 20 years for new issues?				
b. Not subject to discretionary withdrawal?				
c. Total gross?				
d. Reinsurance ceded?				
e. Total net?				
f. Amount with current surrender charge of 5% or more included in the current year in a.ii above. that will have less than a 5% surrender charge (and thus be reported with the amounts at book value with minimal or no charge or adjustment noted in a.v. above) in the year subsequent to the balance sheet year? (Note that percentage of total is not required for this item).				
3. Has the entity disclosed the amounts of account value, cash value and reserve for the breakouts of life insurance by withdrawal characteristics, separately for General Account products, Separate Account Guaranteed products, and Separate Account Nonguaranteed products as follows [SSAP No. 51 par. 47]:				
a. Subject to discretionary withdrawal, surrender values, or policy loans:				
i. Term Policies with Cash Value				
ii. Universal Life				
iii. Universal Life with Secondary Guarantees				
iv. Indexed Universal Life				
v. Indexed Universal Life with Secondary Guarantees				

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	Yes	No	N/A	Comments
vi. Indexed Life				
vii. Other Permanent Cash Value Life Insurance				
viii. Variable Life				
ix. Variable Universal Life				
x. Miscellaneous Reserves				
b. Not subject to discretionary withdrawal or no cash value:				
i. Term Policies without Cash Value				
ii. Accidental Death Benefits				
iii. Disability – Active Lives				
iv. Disability – Disabled Lives				
v. Miscellaneous Reserves				
c. Total gross (Direct + Assumed)				
d. Reinsurance ceded				
e. Total net (Net: Total gross (paragraph 47.c.) less Reinsurance ceded (paragraph 47.d.))				
4. Has the entity reconciled total life insurance reserves amount disclosed to the appropriate sections of the Aggregate Reserves for Life Policies and Contracts Exhibit (Exhibit 5) of the Life, Accident and Health Annual Statement and the corresponding lines in the Separate Accounts Statement. The reconciliation is a single presentation including all amounts from the sections on Individual Life Insurance and Group Life Insurance. [SSAP No. 51, par. 48]				
5. Has the entity reconciled the total annuity reserves and deposit fund liabilities amount disclosed in the (non-life reserves) annual statement Aggregate Reserve for Life Contracts Exhibit 5 and the deposit-type contract fund liabilities from the Deposit-Type Contracts Exhibit 7, of the Life, Accident & Health Annual Statement and the corresponding lines in the Separate Accounts Statement. The reconciliation is a single presentation including all amounts from the sections on Individual Annuities, Group Annuities and Deposit-Type Contracts. [SSAP No. 51, par. 49]				

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	Yes	No	N/A	Comments
6. Has the entity disclosed amount of life insurance premiums and annuity considerations deferred and uncollected on policies in force as of the financial statement date, disclose separately the amounts and the loading excluded for each of the following lines of business: [SSAP No. 51, par. 50]				
a. Industrial business?				
b. Ordinary new business?				
c. Ordinary renewal?				
d. Credit life?				
e. Group life?				
f. Group annuity?				
7. Has the entity disclosed the aggregate amount of direct premiums written through managing general Agents or third party administrators? [SSAP No. 51, par. 51; SSAP No. 53 par. 19; SSAP No. 59 par. 19]				
a. Name and address of managing general agent or third party administrator?				
b. Federal Employer Identification Number?				
c. Whether such person holds an exclusive contract?				
d. Types of business written?				
e. Type of authority granted (i.e., underwriting, claims payment, etc.)?				
f. Total premium written?				
8. For participating insurance does disclosure include: [SSAP No. 51, par. 52]				
g. The relative percentage?				
h. The method of accounting for policyholder dividends?				



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i. The amount of dividends?				
j. The amount of any additional income allocated to participating policyholders?				
9. Has the entity disclosed if the reserve amount calculated on the state prescribed or permitted valuation basis is materially different from the reserve amount calculated on the A-820 valuation basis. [SSAP No. 51, par. 53]				

**Note:** The following disclosures are related to the Net Negative (Disallowed) Interest Maintenance Reserve (INT 23-01)

**Net Negative (Disallowed) Interest Maintenance Reserve**

1. For reporting entities admitting net negative (disallowed) IMR, has the following been disclosed?
  - a. Unamortized balances in IMR separately between gains and losses (Applies to reporting entities that have allocated gains/losses to IMR from derivatives that were reported at fair value prior to the termination of the derivative)
  - b. Net negative (disallowed) IMR in aggregate and allocated between the general account, insulated separate account and non-insulated account,
  - c. Amounts of negative IMR admitted in the general account and reported as an asset in the separate account insulated and non-insulated blank,
  - d. The calculated adjusted capital and surplus per paragraph 9.a., and
  - e. Percentage of adjusted capital and surplus for which the admitted net negative (disallowed) IMR represents (including what is admitted in the general account and what is recognized as an asset in the separate account).
2. Did the reporting entities include a note disclosure that attests to the following statements:
  - a. Fixed income investments generating IMR losses comply with the reporting entity's documented investment or liability management policies?


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	Yes	No	N/A	Comments
b. IMR losses for fixed income related derivatives are all in accordance with prudent and documented risk management procedures, in accordance with a reporting entity's derivative use plans and reflect symmetry with historical treatment in which unrealized derivative gains were reversed to IMR and amortized in lieu of being recognized as realized gains upon derivative termination?				
c. Any deviation to 13.c.i was either because of a temporary and transitory timing issue or related to a specific event, such as a reinsurance transaction, that mechanically made the cause of IMR losses not reflective of reinvestment activities?				
d. Asset sales that were generating admitted negative IMR were not compelled by liquidity pressures (e.g., to fund significant cash outflows including, but not limited to excess withdrawals and collateral calls).				

**B. Individual and Group Accident and Health Contracts**

1. Have the aggregate amount of direct premiums written through managing general agents or third party administrators been disclosed? [ SSAP No. 54 par. 33] <b>Note:</b> For purposes on this instruction, a managing general agent means the same as referenced Appendix A-225 of the NAIC Manual.				
2. If the amount of direct premiums written through managing general agents is equal or greater than 5% of surplus, has the following been disclosed for each managing general agent and third party administrator? [ SSAP No. 54 par. 33]				
a. Name and address of managing general agent or third party administrator?				
b. Federal Employer Identification Number? <b>Note:</b> If this information has been disclosed in the annual statement, the NAIC does not object to not disclosing this ID number in the audited financial statements.				
c. Whether such person holds an exclusive contract?				

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	Yes	No	N/A	Comments
d. Types of business written?				
e. Type of authority granted (i.e., underwriting, claims payment, etc)?				
f. Total direct premiums written/produced by managing general agents or third party administrators?				
3. Have the following items related to individual and group accident and health contracts been disclosed in the financial statements: [SSAP No. 54 par. 34]				
a. The relative percentage of participating insurance?				
b. The method of accounting for policyholder dividends?				
c. The amount of dividends?				
d. The amount of any additional income allocated to participating policyholders?				
4. If a premium deficiency reserve is established in accordance with SSAP No. 54 par. 19, has the amount of that reserve been disclosed? [SSAP No. 54 par. 35] <b>Note:</b> If a reporting entity utilizes anticipated investment income as a factor in the premium deficiency calculation, disclosure of such shall be made in the financial statements.				
5. Has the method used by the reporting entity to estimate premium adjustments for contracts subject to redetermination been disclosed? [SSAP No. 54 par. 36] <b>Note:</b> The amount of net premiums that are subject to such adjustments, as well as the corresponding percentage to total net premiums, shall be disclosed.				

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	Yes	No	N/A	Comments
6. Has the entity disclosed management's policy for providing charity care, as well as the level of charity care provided, in the financial statements? Has the disclosure been measured based on the provider's direct and indirect costs of providing charity care services? If costs cannot be specifically attributed to services provided to charity care patients, management may estimate the costs of those services using reasonable techniques with the method used to identify or estimate such costs disclosed. Has the entity also disclosed funds received to offset or subsidize charity services provided (for example, from gifts or grants restricted for charity care or from an uncompensated care fund)? [SSAP No. 54 par. 37]				

### C. Deposit Type Contracts

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1. For life and annuity reserves, do the financial statements disclose the following: [SSAP No. 52 par 18]

- a. A description of reserve practices including the amount of any surrender value promised in excess of the reserve as legally computed?
- b. The method of determination of tabular interest on funds not involving life contingencies?
- c. The nature of other significant reserve changes?


2. For the disclosure noted below, has the amount of annuity actuarial reserves and deposit liabilities by withdrawal characteristics for the categories of general account, separate account with guarantees, separate account nonguaranteed as well as the total percentage of the total, include a separate section for Individual Annuities, Group Annuities, and Deposit-Type Contracts (with no life contingencies)? Supplementary contracts with life contingencies are reported in the appropriate Annuities section (Individual or Group): [SSAP No. 52 par. 19]

- a. Subject to discretionary withdrawal:

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	Yes	No	N/A	Comments
1) With market value adjustment, where withdrawal of funds is payable at all times, or prior to specified maturity dates where such dates are more than one year after the statement date and;				
i. In a lump sum with adjustments to reflect general changes in interest rates, or asset values since receipt of funds by the insurer;				
ii. In installments over five years or more, with or without a reduction in the interest rate during the instalment period;				
2) At book value less current surrender charge, where the withdrawal of funds is payable at all times or at any time within one year from the statement date in a lump sum object to a current fixed surrender charge of 5% or more and it does not contain a meaningful bail out rate as described in SSAP No. 52 par. 19 (a) (v.(d))?				
3) At fair value, where the withdrawal of funds is payable at current market value of the assets supporting the liabilities, the assets are stated at current market value, and the liabilities are stated at the current market value or per unit value of the assets supporting the liabilities? <b>Note:</b> These liabilities are for contracts where the customer bears the entire investment risk.				
4) Total with adjustment or at fair value?				
5) At book value without adjustment (minimal or no charge or adjustment), where the withdrawal of funds is either payable at all times, or at any time (including a withdrawal on a scheduled payment date) within one year from the statement date and:				
i. In a lump sum without adjustment?				
ii. In instalments over less than five years, with or without a reduction in interest rate during the installment period?				

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	Yes	No	N/A	Comments
iii. In a lump sum subject to a fixed surrender charge of less than 5%?				
iv. In a lump sum subject to a surrender charge, but such charge is waived if the credited rate falls below a specified "bail out" rate and the "bail out" rate is more than the maximum statutory valuation rate for the life insurance policies for more than 20 years for new issues?				
b. Not subject to discretionary withdrawal?				
c. Total gross? (Direct + Assumed)				
d. Reinsurance ceded?				
e. Total net? (Net: Total gross (Par 19.c.) less Reinsurance ceded (paragraph 19.d))				
f. Amount with current surrender charge of 5% or more included in the current year in paragraph 19.a.ii that will have less than a 5% surrender charge (and thus be reported with the amounts at book value with minimal or no charge or adjustment noted in paragraph 19.a.v) in the year subsequent to the balance sheet year. (Note that percentage of total is not required for this item.)				
3. Have the total annuity reserves and deposit fund liabilities amount disclosed in the (non-life reserves) annual statement Aggregate Reserve for Life Contracts Exhibit 5, of the Life, Accident & Health Annual Statement and the corresponding lines in the Separate Accounts Statement been reconciled? The reconciliation is a single presentation including all amounts from the sections on Individual Annuities, Group Annuities and Deposit Type Contracts. [SSAP No.52, par.20]				
4. For FHLB agreements accounted for under SSAP No. 52, has the entity made the disclosures required by SSAP No. 30? [SSAP No. 52 par. 21] (See <a href="#">Investments – Common Stock</a> ).				

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<p>5. For life insurance claims, disclose the following information regarding the reporting entity's use of retained asset accounts for beneficiaries: [SSAP No. 52, par. 22]</p> <p>Note: For purposes of this disclosure, retained asset accounts represent settlement of life insurance proceeds, which are retained by the insurance entity within their general account for the benefit of the beneficiaries. Amounts held outside of the insurance entity, for example in a non-insurance subsidiary, affiliated or controlled entity accounted for under SSAP No. 97—<i>Investments in Subsidiary, Controlled, and Affiliated Entities</i>, such as an interest bearing account established in the beneficiary's name with a bank or thrift institution (and subject to applicable Federal Deposit Insurance Corporation coverage) are only required to be described in the context of the structure of the reporting entity's program in accordance with a. below, but quantitative information regarding retained asset accounts transferred outside of the reporting entity are not required.</p>				
<p>a. A narrative description of how the accounts are structured and reported within the reporting entity's financial statements (e.g., as drafts written by the reporting entity and reported within cash and supplemental contracts without life contingencies; as accounts transferred into the beneficiary's name to an affiliated or unaffiliated bank or other financial institution in which the reporting entity has disposed of its liabilities and related assets, etc.). This description should include all of the different interest rates paid to retained asset account holders during the reporting year and the number of times changes in rates were made during the reporting year. The description should also include a listing of all applicable fees charged by the reporting entity that are directly or indirectly associated with the retained asset accounts. Also, indicate if the retained asset account is the default method for satisfying life insurance claims.</p>				

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	Yes	No	N/A	Comments
b. Number and balance of retained asset accounts in force at the end of the current year and prior year segregated within “aging categories” of:				
i. “up to 12 months”				
ii. “13 to 24 months”				
iii. “25 to 36 months”				
iv. “37 to 48 months”				
v. “49 to 60 months”				
vi. “over 60 months;”				
c. Number and balance of retained asset accounts in force at the beginning of the year segregated between individual and group contracts.				
d. Number and amount of retained asset accounts issued during the year segregated between individual and group contracts.				
e. Investment earnings credited to retained asset accounts segregated between individual and group contracts.				
f. Fees and other charges assessed to retained asset accounts during the year segregated between individual and group contracts.				
g. Number and amount of retained asset accounts transferred to state unclaimed property funds segregated between individual and group contracts.				
h. Number and amount of retained asset accounts closed/withdrawn during the year segregated between individual and group contracts.				
i. Number and balance of retained asset accounts in force at the end of the year segregated between individual and group contracts.				

**D. Credit Life and Accident and Health Insurance Contracts**

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1. Have the following regarding life reserves been disclosed in the financial statements: [SSAP No. 59 par. 17]

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	Yes	No	N/A	Comments
a. A description of reserve practices concerning the following:				
i. Waiver of deduction of deferred fractional premiums upon death of insured?				
ii. Return of portion of final premium for periods beyond the date of death?				
b. The methods employed in the valuation of substandard policies?				
c. The amount of insurance, if any, for which the gross premiums are less than the net premiums according to the valuation standards?				
d. The method used to determine tabular interest, tabular less actual reserves released, and tabular cost (by formula or from the basic data for such items)?				
e. The nature of significant other reserve changes?				
2. If the company has reported life insurance premiums deferred and uncollected on policies in force as of the financial statement date, have the amounts and the loading excluded for credit life business been separately disclosed? [SSAP No. 59 par. 18]				

#### E. Separate Accounts

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Paragraphs 31-35 detail the separate account disclosure requirements that shall be included within the Life, Accident and Health Annual Statement Blank. Paragraphs 36-38 detail the separate account disclosure requirements that shall be included within the Separate Account Annual Statement Blank.

1. The general account financial statement shall include detailed information on the reporting entity's separate account activity. Are the disclosures below included? [SSAP No. 56 par. 31]				
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	Yes	No	N/A	Comments
a. A narrative of the general nature of the reporting entity's separate account business.				
b. Identification of the separate account assets that are legally insulated from the general account claims.				
c. Identification of the separate account products that have guarantees backed by the general account. This shall include:				
i. Amount of risk charges paid by the separate account to the general account for the past five (5) years as compensation for the risk taken by the general account.				
ii. Amount paid by the general account due to separate account guarantees during the past five (5) years.				
d. Discussion of securities lending transactions within the separate account, separately including the amount of any loaned securities within the separate account, and if policy and procedures for the separate account differ from the general account.				
2. For each grouping (as detailed in 3 below), has the following been disclosed: [SSAP No. 56 par. 32]				
a. Premiums, considerations or deposits received during the year?				
b. Reserves by the valuation basis of the investments supporting the reserves at the financial statement date? <b>Note:</b> List reserves for separate accounts whose assets are carried at fair value separately from those whose assets are carried at amortized cost/book value.				
c. Reserves by withdrawal characteristics (i.e. including whether or not the separate account is subject to discretionary withdrawal.) For reserves subject to discretionary withdrawal have the following categories been included if applicable:				

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	Yes	No	N/A	Comments
1) With market value adjustment?				
2) At book value without market value adjustment and with surrender charge of 5% or more?				
3) At fair value?				
4) At book value without market value adjustment and with surrender charge of less than 5%?				
d. Reserves for asset default risk, as described in SSAP No. 56 par. 18 (b), that are recorded in lieu of AVR?				
3. For the disclosures required in par. 32, have separate accounts been addressed in the following groupings: [SSAP No. 56 par. 33] <b>Note:</b> The groupings are the same as those used for risk-based capital.				
a. Separate Accounts with Guarantees:				
i. Indexed separate accounts, which are invested to mirror an established index which is the basis of the guarantee?				
ii. Nonindexed separate accounts, with reserve interest rate at no greater than 4% and/or fund long-term interest guarantee in excess of a year that does not exceed 4%?				
iii. Nonindexed separate accounts, with reserve interest rate at greater than 4% and/or fund long-term interest guarantee in excess of a year that exceeds 4%?				
b. Nonguaranteed Separate Accounts – Variable separate accounts, where the benefit is determined by the performance and/or market value of the investments held in the separate account? <b>Note:</b> Include variable accounts with incidental risks, nominal expense, and minimum death benefit guarantees.				

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4. Has a reconciliation of the amount reported as transfers to and from separate accounts in the Summary of Operations of the separate accounts statement and the amount reported as net transfers to or from separate accounts in the Summary of Operations of the general accounts statement been provided? [SSAP No. 56 par. 34]				
5. Does the Separate Account Annual Statement Blank include detailed information on the characteristics of the separate account assets, specifically categorizing separate account assets in accordance with the following characteristics: [SSAP No. 56 par. 36]				
a. Identification of separate account assets that are legally insulated from the general account and those which are not legally insulated.				
b. Aggregation of separate account assets from products registered with the SEC and separate account assets from products excluded from registration. In addition to the overall aggregation, this disclosure shall specifically identify separate account assets from private placement variable annuities (PPVA) and private placement life insurance (PPLI).				
c. Amount of separate account assets that represent seed money, other fees and expenses due to general account, and additional required surplus amounts. <b>Note:</b> This disclosure shall include the amount of seed money and other fees and expenses currently included in the separate account, as well as the amount of seed money received and repaid to the general account during the current year. This disclosure shall also include information on insulation (if applicable), the time duration for which seed money and other fees and expenses due the general account are retained in the separate account, and information on how whether seed money is invested pursuant to general account directives or in accordance with stated policies and procedures.				

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<p>d. Identification of the separate account assets in which the investment directive is not determined by a contractholder.  <b>Note:</b> (In most instances, having multiple investment choices at the option of a contractholder would be considered a situation in which the investment directive is determined by a contractholder. This is not true for situations in which the asset is invested in a manner that mirrors the investment directives of the general account.) Situations in which the investment directive is not determined by the contractholder (and situations in which the reporting entity is the contractholder) shall include disclosure regarding whether the investments of the respective separate account assets, if included within the general account investments, would have resulted with the reporting entity exceeding any investment limitations imposed on the general account.</p>				
<p>e. Identification of the separate account assets in which less than 100% of investment proceeds are attributed to a contractholder.  <b>Note:</b> This shall include identification of the separate account investment income attributed to the reporting entity during the reporting period and whether such income was transferred to the general account or reinvested within the separate account. Instances in which such income is reinvested within the separate account shall include disclosure on whether the subsequent investments, if categorized with investments in the general account, would have exceeded investment limitations imposed on the general account.</p>				

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	Yes	No	N/A	Comments
6. For all separate account assets not reported at fair value, indicate the measurement basis (amortized cost or other method) for each asset (or asset class) and whether the measurement method was grandfathered in under the transition guidance in this SSAP, or whether the measurement method is allowed under a prescribed or permitted practice. This disclosure shall include a comparison of the assets' reported value to fair value with identification of the resulting unrealized gain/loss that would have been recorded if the assets had been reported at fair value. [SSAP No. 56 par. 37]				
7. For all separate accounts that include securities lending transactions, disclose the reporting entity's use and policy of securities lending within the separate account, including the amount of loaned securities from the separate account at the reporting date, the percentage of separate account assets lent as of that date, a description for which type of accounts (e.g., book value accounts, market value account accounts) are lent, if the separate account policyholder is notified or approves of such practices, the policy for requiring collateral, whether the collateral is restricted and the amount of collateral for transactions that extend beyond one year from the reporting date. This disclosure requires the entity to provide the following information as of the date of the statement of financial position: [SSAP No. 56 par. 38]				
a. The aggregate amount of contractually obligated open collateral positions (aggregate amount of securities at current fair value or cash received for which the borrower may request the return of on demand) and the aggregate amount of contractually obligated collateral positions under 30-day, 60-day, 90-day, and greater than 90-day terms.				
b. The aggregate fair value of all securities acquired from the sale, trade and use of the accepted collateral (reinvested collateral).				
c. Information about the sources and uses of that collateral.				

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8. Identify all products reported as a separate account product under statutory accounting principles and identify whether each product was classified differently under GAAP. For products that resulted with different classifications between GAAP and SAP, identify the characteristic(s) of the product that prevented it from receiving a separate account classification under GAAP. This disclosure is applicable for all reporting entities. Thus, if GAAP financial statements were not filed, the reporting entity should complete this disclosure as if GAAP financials had been completed. [SSAP No. 56 par. 39]				

**F. Life, Deposit-Type and Accident and Health Reinsurance**

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1. Have the following life and annuity reserves been disclosed in the financial statements: [SSAP No. 61 par. 66]

- a. A description of reserve practices concerning the following:

- i. Waiver of deduction of deferred fractional premiums upon death of insured?
- ii. Return of portion of final premium for periods beyond the date of death?
- iii. Amount of any surrender value promised in excess of the reserve as legally computed?

- b. The methods employed in the valuation of substandard policies?
- c. The amount of insurance, if any, for which the gross premiums are less than the net premiums according to the valuation standards?
- d. The method used to determine tabular interest, tabular less actual reserves released, and tabular cost (by formula or from the basic data for such items)?
- e. The method of determination of tabular interest on funds not involving life contingencies?


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	Yes	No	N/A	Comments
f. The nature of significant other reserve changes?				
2. For reinsurance of variable annuity contracts/certificates with an affiliated captive reinsurer, has the reporting entity disclosed the following for each transaction in the annual financial statements [SSAP No. 61 par. 67]:				
a. The type of benefits being reinsured (e.g., GMDB, GLIB and other guaranteed benefits)				
b. A description that accurately conveys the purpose of the transaction and significant terms of the reinsurance agreement				
c. A description of any risks retroceded to a third party as well as the ultimate risks retained by the reporting entity and its parent, subsidiaries and affiliates				
d. Whether the reporting entity reinsures variable annuities in a stand-alone captive arrangement, or a multi-product captive arrangement				
e. The amount of reserves held by the affiliated captive reinsurer, the reserve methodology for the affiliated captive reinsurer's financial statements, a brief description of the hedge target and how the reserve methodology differs from the requirements of Actuarial Guideline XLIII—CARVM For Variable Annuities (AG 43)				
f. Identify any permitted or prescribed practices that apply to the affiliated captive reinsurer, in substance and form, following the guidance in SSAP No. 1 – Accounting Policies, Risks & Uncertainties, and Other Disclosures				
3. For each reinsurance agreement with an affiliated captive reinsurer (same definition as paragraph 67), has the entity provided the following information in the annual financial statements [SSAP No. 61 par. 68]:				
a. Reserve credit taken by the reporting entity for variable annuities.				
b. The total amount of collateral supporting any reserve credit taken, if applicable.				



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c. A description of the nature of the collateral (funds withheld by the reporting entity, assets placed in trust for the benefit of the cedent, Letters of Credit, etc.), if applicable as well as a tabular presentation of the value of all assets held by or on behalf of the captive reinsurer that back the variable annuities liabilities (including capital).				
4. For the disclosures noted below, have the following amount of annuity actuarial reserves and deposit liabilities by withdrawal characteristics for the categories of general account, separate account with guarantees, separate account nonguaranteed as well as the total and percentage of the total, include a separate section for Individual Annuities, Group Annuities, and Deposit-Type Contracts (with no life contingencies) been disclosed: [SSAP No. 61 par. 69]. Supplementary contracts with life contingencies are reported in the appropriate Annuities section (Individual or Group).				
a. Subject to discretionary withdrawal:				
i. With market value adjustment, where withdrawal of funds is payable at all times, or prior to specified maturity dates where such dates are more than one year after the statement date and;				
a) In a lump sum with adjustments to reflect general changes in interest rates, or asset values since receipt of funds by the entity?				
b) In installments over five years or more, with or without a reduction in the interest rate during the installment period?				
ii. At book value less current surrender charge, where the withdrawal of funds is payable at all times, or at any time within one year from the statement date in a lump sum subject to a current fixed surrender charge of 5% or more and it does not contain a meaningful bail out rate as described in SSAP No. 61 par. 69 a (v) (d)?				

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	Yes	No	N/A	Comments
iii. At fair value, where the withdrawal of funds is payable at current market value of the assets supporting the liabilities, the assets are stated at current fair value, and the liabilities are stated at the current fair value or per unit value of the assets supporting the liabilities? <b>Note:</b> These liabilities are for contracts where the customer bears the entire investment risk.				
iv. Total with adjustment or at fair value?				
v. At book value without adjustment (minimal or no charge or adjustment), where the withdrawal of funds is either payable at all times, or at any time (including a withdrawal on a scheduled payment date) within one year from the statement date and:				
a) In a lump sum without adjustment?				
b) In installments over less than five years, with or without a reduction in interest rate during the installment period?				
c) In a lump sum subject to a fixed surrender charge of less than 5%?				
d) In a lump sum subject to surrender charge, but such charge is waived if the credited rate falls below a specified "bail out" rate and the "bail out" rate is more than the maximum statutory valuation rate for life insurance policies of more than 20 years for new issues?				
b. Not subject to discretionary withdrawal?				
c. Total gross? (Direct + Assumed)				
d. Reinsurance ceded?				
e. Total net? (Net: Total gross (par 69.c.) less Reinsurance ceded (par 69.d.))				

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f. Amount with current surrender charge of 5% or more included in the current year in paragraph 69.a.ii. that will have less than a 5% surrender charge (and thus be reported with the amounts at book value with minimal or no charge or adjustment noted in paragraph 69.a.v) for the first time within the year subsequent to the balance sheet year. (Note that percentage of total is not required for this item.)				
5. Has the reconciliation of the total annuity reserves and deposit fund liabilities amount been disclosed in the (non-life reserves) annual statement the Aggregate Reserve for Life Contracts Exhibit 5 and the deposit type contract fund liabilities from the Deposit Type Contracts Exhibit 7 of the Life, Accident & Health Annual Statement and the corresponding lines in the Separate Accounts Statement? The reconciliation is a single presentation including all amounts from the sections on Individual Annuities, Group Annuities and Deposit-Type Contracts. [SSAP No. 61 par. 70]				
6. Reconcile total life insurance reserves amount disclosed to the appropriate sections of the Aggregate Reserves for Life Policies and Contracts Exhibit 5 of the Life, Accident and Health Annual Statement and the corresponding lines in the Separate Accounts Statement. The reconciliation is a single presentation including all amounts from the sections on Individual Life Insurance and Group Life Insurance. [SSAP No. 61 par. 71]				
7. Are disclosures consistent with the interrogatories made under the "Ceded Reinsurance Report" detailed in the <i>NAIC Annual Statement Instructions for Life, Accident, and Health Insurance Companies</i> in the Notes to the Financial Statements section? [SSAP No. 61 par. 72]				
8. Have the following uncollectible reinsurance written off during the year reported in the following annual statement classifications, including the name or names of the reinsurer(s), been disclosed: [SSAP No. 61 par. 73]				
a. Claims incurred?				
b. Claim adjustment expenses incurred?				
c. Premiums earned?				

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d. Other?				
9. Have the following commutation of ceded reinsurance during the year reported in the following statement classifications, including the name or names of the reinsurer(s), been disclosed: [SSAP No. 61 par. 74]				
a. Claims incurred?				
b. Claim adjustment expenses incurred?				
c. Premiums earned?				
d. Other?				
10. For any reporting period in which a certified reinsurer's rating has been downgraded or its certified reinsurer status is subject to revocation and additional collateral has not been received as of the filing date, have the following been disclosed: [SSAP No. 61 par. 75]				
a. Name of certified reinsurer downgraded or subject to revocation of certified reinsurer status and relationship to the reporting entity?				
b. Date of downgrade or revocation and jurisdiction of action?				
c. Collateral percentage requirements pre and post downgrade or revocation?				
d. Net obligation subject to collateral?				
e. As of the end of the current quarter, the estimated impact of the collateral deficiency to the reporting entity as a result of the assuming entity's downgrade or revocation of certified reinsurer status? Or, at year-end, actual impact of the collateral deficiency on the provision for reinsurance shall be disclosed?				

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f. If the reporting entity is a certified reinsurer (U.S. domiciled reinsurers are eligible for certified reinsurer status), do the financial statements disclose the impact on any reporting period in which its certified reinsurer rating is downgraded or status as a certified reinsurer is subject to revocation? Do these disclosures contain information similar to b, c, and d above, and the expectation of its ability to meet the increased requirements?				
11. Has the entity disclosed the number of reinsurance contracts in which risks under Covered Policies have been ceded by the reporting entity and the following details for each such contract: [SSAP No. 61 par. 76b]				
a. Whether funds consisting of Primary Security, in an amount at least equal to the Required Level of Primary Security, are held by or on behalf of the reporting entity as security under the reinsurance contract within the meaning of paragraph 19 of Appendix A-785 - Credit for Reinsurance on a funds withheld, Trust, or modified coinsurance basis, and, if not, the amount of the shortfall				
b. Whether funds consisting of Other Security, in an amount at least equal to any portion of the statutory reserves as to which Primary Security is not held pursuant to SSAP No. 61 paragraph 75.b.i., are held by or on behalf of the reporting entity as security under the reinsurance contract within the meaning of paragraph 19 of Appendix A-785 - Credit for Reinsurance, and, if not, the amount of the shortfall				
12. For any contract as to which a shortfall exists and is required to be disclosed under SSAP No. 61 paragraphs 76.b.i. and 76.b.ii., has the entity identified all of the following: [SSAP No.61 par. 76b.iii.]				
(1) The assuming insurer by name and NAIC code (if any)				
(2) The name and effective date of the contract				

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(3) The total amount of XXX/AXXX statutory reserves ceded under the contract;				
(4) The Required Level of Primary Security				
(5) The actual amount of Primary Security				
(6) The actual amount of Other Security				
(7) The amount of the shortfall(s) in Primary Security and/or Other Security required to be disclosed under paragraphs 75.b.i. and 75.b.ii.				

13. For each captive in which a risk-based capital shortfall exists per the XXX/AXXX Captive Reinsurance Consolidated Exhibit has the entity disclosed the following: [SSAP No. 61 par. 77a]

a. List the name of the captive and the dollar amount of the risk-based capital shortfall.				
b. List the total adjusted capital (TAC) for the current year as reported in the Five-Year Historical Data page of the annual statement, along with the quantity of the sum of the total adjusted capital (TAC) and the total of the risk-based capital shortfalls shown in SSAP No. 61 paragraph 77.a.i.				

14. For each reinsurer for which a non-zero primary security shortfall is shown on the XXX/AXXX Reinsurance Primary Security Shortfall by Cession exhibit, has the entity listed the name of the reinsurer and the amount of primary security shortfall? Also, is the total shortfall from that exhibit across all reinsurers shown? [SSAP No. 61 par. 77b]

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15. Disclose any ceded reinsurance contracts (or multiple contracts with the same reinsurer or its affiliates) subject to A-791 that includes a provision, which limits the reinsurer's assumption of significant risks identified as in A-791. Examples of risk-limiting features include provisions such as a deductible, a loss ratio corridor, a loss cap, an aggregate limit or similar effect. If true, indicate the number of reinsurance contracts to which such provisions apply. For contracts subject to A-791, indicate if deposit accounting was applied for all contracts, which limit significant risks. [SSAP No. 61 par. 79]				
16. Disclose any ceded reinsurance contracts (or multiple contracts with the same reinsurer or its affiliates) not subject to A-791, for which reinsurance accounting was applied and includes a provision that limits the reinsurer's assumption of risk. Examples of risk-limiting features include provisions such as a deductible, a loss ratio corridor, a loss cap, an aggregate limit or similar effect. Note that a stop loss or excess of loss reinsurance agreement with deductibles or loss caps, which apply to the entire contract and are not adjustable based on other features, do not require disclosure under this paragraph. If true, indicate the number of reinsurance contracts to which such provisions apply. If affirmative, indicate if the reinsurance credit was reduced for the risk-limiting features. [SSAP No. 61 par. 80]				
17. Disclose if any ceded reinsurance contracts contain features (except reinsurance contracts with a federal or state facility) described below which result in delays in payment in form or in fact: [SSAP No. 61 par. 81]				
a) Provisions which permit the reporting of losses, or settlements are made, less frequently than quarterly or payments due from the reinsurer are not made in cash within ninety (90) days of the settlement date (unless there is no activity during the period).				
b) Payment schedule, accumulating retentions from multiple years or any features inherently designed to delay timing of the reimbursement to the ceding entity				

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18. Disclose if the reporting entity has reflected reinsurance accounting credit for any contracts not subject to Appendix A-791 and not yearly renewable term, which meet the risk-transfer requirements of SSAP No. 61 and identify the type of contracts and the reinsurance contracts. [SSAP No. 61 Par. 82]				
a) Assumption Reinsurance – As discussed in SSAP No. 61 Par. 60, which are new for the reporting period.				
19. Disclose if the reporting entity ceded any risk which is not subject to A-791 and not yearly renewable term reinsurance, under any reinsurance contract (or multiple contracts with the same reinsurer or its affiliates) during the period covered by the financial statement, and either: [SSAP No. 61 Par. 83]				
<b>Note:</b> If the reporting entity does not prepare U.S. GAAP financial statements or its financial statements are not part of upstream U.S. GAAP financial statements, this disclosure can be answered not applicable.				
a. Accounted for that contract as reinsurance under statutory accounting principles (SAP) and as a deposit under U.S. generally accepted accounting principles (GAAP); or				
b. Accounted for that contract as reinsurance under U.S. GAAP and as a deposit under SAP.				
20. If affirmative disclosure is required for paragraph 83, explain why the contract(s) is treated differently for GAAP and SAP. [SSAP No. 61 Par. 84]				

**Note:** Scottish Re Life Reinsurance Liquidation Questions (INT 23-04). This interpretation is applicable only to the accounting and reporting of reinsurance recoverables from Scottish Re, a U.S.-based life reinsurer in liquidation. Note that the relevant disclosures in SSAP No. 61 and other relevant SSAPs continue to apply to a life reinsurance contracts which is commuted and recaptures due to a liquidation.

Do the disclosures in the reinsurance notes include the following:

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1. Additional information necessary to obtain an understanding of the impact of Scottish Re reinsurance counterparties in liquidation, including but not limited to:				
a. Reinsurance payable liabilities?				
b. Reinsurance recoverables by paid claims and other amounts?				
c. Information regarding the status of any collateral and its fair value?				
d. If applicable, any individual components (e.g., unreimbursed claims or provisions for future losses) of recoverable amounts that are presented in the aggregate on the financial statements?				
Does this disclosure include:				
i. Measurement of any reinsurance recoverables?				
ii. Impairment of any reinsurance recoverables?				
iii. Collectability of any reinsurance recoverables?				
iv. Timing of expected payments?				
v. Nonadmitted amounts?				

**F. Certain Health Care Receivables and Receivables Under Government Insured Plans**

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1. Has the method used to estimate pharmaceutical rebate receivables been disclosed? [SSAP No. 84 par. 23]				
2. For the most recent three years and for each quarter therein, have the following been disclosed: [SSAP No. 84 par. 23]				
a. Estimated balance of pharmacy rebate receivable as reported on the financial statements?				
b. Pharmacy rebates as invoiced or confirmed in writing?				
c. Pharmacy rebates collected?				

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3. Has the method used to estimate the reporting entity's risk sharing receivables been disclosed? [SSAP No. 84 par. 24] <b>Note:</b> If any receivable and payable balances with the same provider are netted, the reporting entity shall disclose the gross receivable and payable balances in the notes to the financial statements.				
4. For the most recent three years, have the following been disclosed: [SSAP No. 84 par. 24]				
a. Risk sharing receivables as estimated and reported on the prior year financial statements for annual periods ending in the current year?				
b. Risk sharing receivables as estimated and reported on the financial statements for annual periods ending in the current year and the following year?				
c. Risk sharing receivables invoiced as determined after the annual period?				
d. Risk sharing receivables not yet invoiced?				
e. Amounts collected from providers as payments under risk sharing contracts?				