



2024-2025 Individual Life and Annuity Expense Study Data Request

APRIL | 2026

CONTENTS

Request for Data Contributions.....	3
Purpose of the Study	3
Scope of the Study.....	3
Form of Data Contributions	3
Important Dates	4
Data Transmission Instructions	4
Study Outputs.....	4
Benefits to Data Contributors	5
Data Access, Ownership and Retention.....	5
Confidentiality	6
APPENDIX A – Data Format.....	7
APPENDIX B – Line of Business Definitions	8
APPENDIX C – Distribution Channel Definitions.....	10
APPENDIX D – Company Information Tab	11
APPENDIX E – Individual Life Insurance Units Tabs.....	12
APPENDIX F – Individual Life Insurance Expense Tabs	14
APPENDIX G – Individual Annuity Units Tabs.....	16
APPENDIX H – Individual Annuity Expense Tabs	17
APPENDIX I - LLG Governing Information Security Policy.....	19
About LIMRA	20
About The Society of Actuaries Research Institute	20

2024-2025 Individual Life and Annuity Expense Study Data Request

Request for Data Contributions

The Society of Actuaries (SOA) Research Institute's Committee on Life Insurance Company Expenses (CLICE) and LIMRA are soliciting expense experience data for individual life policies and annuity contracts for calendar years 2024 and 2025.

This document describes the procedures for submitting the expense data for the study.

Purpose of the Study

The SOA Research Institute and LIMRA are partnering together to complete industry experience studies. Under this partnership, the SOA Research Institute's CLICE and LIMRA plan to complete an Individual Life and Annuity Expense Experience Study covering experience for calendar years 2024 and 2025. The goals of this study are to:

- provide aggregated industry information on the range of expense levels for individual life insurance and annuities;
- provide useful unit expense benchmark information to actuaries and their companies from which to assess their own unit expense performance for benchmarking, measuring operational efficiencies, and assisting in future strategies; and
- monitor life insurer expense information as related to current and future principles-based reserving techniques for individual life insurance and individual annuities. Results can also be useful in enhancing future development of the Generally Recognized Expense Table (GRET) in the U.S. This table is used by some companies to demonstrate compliance with the NAIC model sales illustration regulation.

Scope of the Study

The study covers Individual Life and Individual Annuity business sold through U.S. life insurance companies. Accident and Health and all Group business are to be excluded.

In addition, this study is intended to capture the experience of direct writers who are domiciled in the U.S. Companies whose primary business is reinsurance will not be included in the results of this study.

Form of Data Contributions

A detailed description of the data request documents can be found in Appendices A through H.

General Instructions

The Committee believes that broad participation is critical to the success of the study. Therefore, it is important that you participate in the study even if you cannot provide all the requested detail. The Committee requests that companies put forth their best efforts and intentions in separating aggregate expenses into product lines and across distribution systems. If all your expenses cannot be broken down by

the requested product lines and distribution systems, please use the “Unallocated” column for responses and, when submitting your contribution, please indicate information that can assist in understanding why data was not provided at the detail level requested.

This study asks for acquisition activity information by distribution channel and line of business and policy/contract maintenance activity information by line of business. Except where otherwise instructed, expenses should be those that are directly incurred by the function described in the line item. Overhead should be recorded in the line items provided for that purpose. Use your best judgment in determining the appropriate method to allocate expenses among the various distribution channels and lines of business.

When data for each distribution channel is provided, please be sure to include both applicable units and expenses so they can be properly matched. Where you are unable to provide the breakdowns by distribution channel, use the “Unallocated” column.

Many items in this survey can be sourced from the reporting processes companies use to compile their Statutory Annual Statement (“Annual Statement”). **Amounts need not tie to any specific figures in the Annual Statement**, but the product definitions and methods used for statutory reporting should be used as a guide to ensure consistency of responses.

Workbooks have been created for the reporting of Calendar Years 2024 and 2025 for Individual Life Insurance and Individual Annuities, with tabs for entering Company Information, and tabs for Units and Expenses for each Product type. We aspire to collect two years of data for this study and then will investigate the opportunity to make data submissions for the most recent calendar year on an annually recurring basis.

Important Dates

Your timely voluntary data submission is a valuable contribution to this Study. We request your data, as described in the following section, no later than **July 31, 2026**. If you would like to contribute, but find that this timing is challenging, please contact StudyPro@soa.org.

Also, please communicate your intent to participate in the study to StudyPro@soa.org by **May 31, 2026**.

We expect that reporting and data visualization dashboard access will occur in March 2027.

Data Transmission Instructions

The SOA Research Institute and LIMRA have partnered to validate, compile, and aggregate the data for this effort. When you are ready to submit your data, please send an email to SOADataTransmissions@limra.com and LIMRA will send you a secure link to facilitate the data transmission.

Study Outputs

A report with high-level summary results of the study will be made publicly available.

In an effort to ensure these important industry studies can be funded on a sustainable basis, the SOA Research Institute and LIMRA are offering the detailed outputs of this work as part of a paid subscription to Experience Studies Pro.

The following may be included in the outputs made available to subscribers:

- detailed experience study report with analysis and commentary;
- a set of data visualization dashboards with the ability to filter on and drill down into the detail of the results of the study;
- dataset(s) containing the aggregated experience collected for the purpose of this study. The datasets may be made available in Excel files, text files or downloads from the data visualization tool; and
- other outputs as determined by the SOA Research Institute and LIMRA.

Any output of the study, whether publicly available or available through an Experience Studies Pro subscription, will not contain any private information or any confidential contributor level information.

Benefits to Data Contributors

Data contributors will be acknowledged in the study output. Their unit expense experience data will be part of a broad industry study that will benefit the industry. The experience data for this study may be compared against other past similar studies.

Data contributors whose data is retained for inclusion in the study and who subscribe to Experience Studies Pro will also receive the following benefits:

- the ability to see their own unit expense experience results compared to the industry results in any non-public, data visualization dashboards or Excel pivot tables;
- the option to choose a group of no less than five (5) peer companies from the companies who provided data to the study and receive a comparison of the aggregated results of these peer companies to their own company results;
 - If you submit data for more than one company, please contact StudyPro@soa.org if you prefer the data for all the companies to be combined as one ‘company group’ or kept as separate individual companies in your peer group analysis.
 - By being a data contributor, you acknowledge and agree that your company’s data may be part of another company’s peer group analysis. If you want to exclude your company’s data from another company’s peer group analysis, please notify StudyPro@soa.org. In this case, your company will not have the option to receive a peer group analysis.
- the opportunity to have a meeting with the SOA Research Institute and LIMRA researcher(s) who performed the analyses for the study. At this meeting, the contributor will be able to quickly gain deeper insights into the results and questions in specific areas of interest.

Data Access, Ownership and Retention

The SOA Research Institute and LIMRA have partnered together to collect and process experience data for this effort. The data collected under this partnership will be processed and housed within LIMRA’s existing study data infrastructure. The agreement between the SOA Research Institute and LIMRA includes provisions to ensure the data is kept secure and confidential. Only SOA Research Institute and LIMRA staff directly involved with the project will have access to the original data. For more information on LIMRA’s information security program, please see the LLG (LIMRA) Governing Information Security Policy in Appendix I.

The SOA Research Institute and LIMRA will create aggregated datasets from the original data contributions for the purpose of completing this effort. All aggregated datasets compiled by the SOA Research Institute and LIMRA from the original data contributions will be the property of the SOA Research Institute and LIMRA. Only SOA Research Institute staff, LIMRA staff, or contracted independent consultants will have

access to contributor-level data. The aggregated datasets may be used for future research, education or other purposes and offerings, as deemed appropriate by the SOA Research Institute or LIMRA.

Confidentiality

All responses to this survey will be kept completely confidential. SOA Research Institute and LIMRA staff will process the responses—no individual company data will be published or shared with CLICE committee members. Where comparative results are presented, no companies will be identified.

APPENDIX A – Data Format

Four Excel workbooks are being used to collect the data across two years of reporting (2024 and 2025) and two product line groups (Individual Life Insurance and Individual Annuities). The tabs at the bottom of the workbook indicate units and expense worksheets for each line of business. You need only fill out the sheets for the lines of business that are applicable to your company. You will not be able to make entries in any cells other than those where data is expected. All other cells are protected. Totals are automatically calculated where applicable. The width of the columns in the workbook has been left justified to make it easier to ensure that the correct figures are inputted.

Please refer to Appendices B-H when assembling your company's data.

APPENDIX B – Line of Business Definitions

This study covers individual life and individual annuity product types across a range of underwriting methods, without delineation of whether sold as guaranteed issue, simplified issue, final expense, accelerated underwriting, or fully underwritten.

One category of products to specifically EXCLUDE due to their uniqueness of product type and expenses (to the extent possible) are Bank-Owned Life Insurance (BOLI) and Corporate-Owned Life Insurance (COLI) products.

Lines of business descriptions are as follows and are intended to be generally consistent with definitions found in the Annual Statement.

- Term - Life insurance policies that are classified as term insurance for purposes of completing the Annual Statement. Term life contracts are generally defined as providing life insurance over a specified period of time. If the insured dies during this term, the face amount of the policy will be paid to the beneficiary.
- Whole Life - Fixed whole life, limited pay life, single premium whole life, and interest sensitive whole life. These products may cover a variety of underwriting methods and permanent insurance product types. Whole life policies generally provide a fixed amount of insurance coverage over the life of the insured and the related benefits are normally payable only upon the insured's death.
- Fixed Universal Life - Fixed premium fixed universal life and flexible premium fixed universal life, where credits to the policy values are defined through a specific interest crediting rate. All Fixed UL products are included, both with and without secondary guarantees.
- Indexed Universal Life - Fixed premium indexed universal life and flexible premium indexed universal life, where credits to the policy values are defined through a reference to performance of a specified investment index. All IUL products are included, both with and without secondary guarantees.
- Variable Universal Life - Fixed premium variable universal life and flexible premium variable universal life, where credits to the policy values are defined according to the investment experience of a separate account or accounts maintained by the insurer. All VUL products are included, both with and without secondary guarantees.
- Fixed Deferred Annuities - Fixed premium, flexible premium and single premium deferred annuities, where credits to the policy values are defined through a specific interest crediting rate. Contracts generally have a specified crediting rate that is periodically and unilaterally adjusted by the company not below the minimum contract rate.
- Fixed Indexed Annuities - Fixed premium, flexible premium and single premium deferred annuities, where credits to the policy values are linked to an external reference such as a specified investment index.
- Variable Deferred Annuities - Fixed premium, flexible premium and single premium variable individual deferred annuities, where credits to the policy values are defined according to the investment experience of a separate account or accounts maintained by the insurer.
- Registered Index-Linked Annuities - Fixed premium, flexible premium and single premium deferred annuities that are securities, where credits to the policy values are defined through a reference to the performance of a specified investment index, while offering partial protection against losses.

- Variable Income Annuities - Annuities for which the annuitant begins receiving periodic payments at a specified date following a variable payment schedule with payments tied to the performance of specified investment subaccounts. This includes variable deferred income annuities, and supplementary contracts in income payment status where the payment is tied to subaccount performance.
- Non-Variable Income Annuities - Annuities for which the annuitant begins receiving periodic payments at a specified date following a fixed payment schedule (including potential inflation increases). This includes non-variable deferred income annuities and supplementary contracts in a fixed income payment status.
- Structured Settlement Annuities - Single premium contracts purchased by property and casualty companies to distribute damage awards to claimants of personal injury or wrongful death lawsuits over a period of time, rather than as a lump sum.

APPENDIX C – Distribution Channel Definitions

Distribution Channels are generally defined similarly to those used in analyses to determine the annual GRET table.

- Independent - Policies marketed and sold through an independent insurance agent or through a range of insurance brokers not primarily affiliated with any one insurance company. These agencies or agents are not employed by the company and operate without an exclusive distribution contract with the company. These include most Personal Producing General Agent (PPGA) arrangements, Independent Marketing Organizations and Independent Multi-Level Marketing organizations. These distributors may sell in a variety of formats, including online independent distribution.
- Career - Policies marketed and sold through a sales force primarily affiliated with one insurance company. These companies recruit, finance, train, and often house financial professionals who are typically referred to as career agents or multi-line exclusive agents.
- Direct - Policies marketed and sold by a company directly to the consumer through methods such as internet, direct mail, print media, broadcast media, telemarketing, retail centers and kiosks, or other media. No direct field compensation is involved.
- Other - Policies marketed and sold outside of the three categories described above. Examples include policies marketed and sold through home service, pre-need, and worksite. If Other is used, please note this in the comments section.
- Unallocated - Use this column if you are unable to segregate your data into the categories shown above.

APPENDIX D – Company Information Tab

All responses to this survey will be kept completely confidential. Society of Actuaries Research Institute (SOA) and LIMRA staff will process the responses—no individual company data will be published or shared with CLICE committee members. Where comparative results are presented, no companies will be identified.

Enter the name of your company and the NAIC Company Codes for one or more companies that are being aggregately represented by the data submission. NAIC Company Codes can be found at the top of Page 1 of the Statutory Annual Statement (“Annual Statement”).

Enter the Corporate Organization Type that best fits the company.

Enter the requested information for the primary company contact for this study.

Enter the amount of Gross Investment Income and Investment Expenses from Lines 10 and 11, respectively, of the Exhibit of Net Investment Income of the NAIC General Account and Separate Account Annual Statement.

Enter the Average Invested Assets for the year in the boxes below Investment Expenses.

Total Cash and Invested Assets can be found on Line 12 of Page 2 of the Annual Statement.

Please note any of the following:

- comments for assistance in understanding reporting on these sheets and allocation methods
- comments on any unique circumstances that would impact comparisons with other companies or across calendar years
- list any significant outsourced functional expenses, and explain how those expenses are included in the expense tabs
- if amounts are reported under other distribution channels, explain the distribution channel used

APPENDIX E – Individual Life Insurance Units Tabs

All expense units reported are for the specified calendar year, either 2024 or 2025.

References are to the NAIC Annual Statement blank. Fraternal companies should use the corresponding lines from the Fraternal blank.

A. New Business - Direct

1. Number of Policies Issued - Number of individual policies issued on direct business. Joint policies should be counted as one policy. **Numbers of riders issued should not be included on this line.** Generally, this data will come from the Exhibit of Life Insurance.
2. Volume Issued (Round to 1000s) - Volume issued as the face amount on the base policy plus any term rider on the primary insured. Other rider volume (with the exception of any term rider on the primary insured) should not be included in this amount. Generally, this data will come from the Exhibit of Life Insurance.
3. First Year Premium Collected - Premium collected on direct business. This includes **all premiums collected on the policy, including any rider premiums.** Generally, this data will come from Exhibit-1 Part 1.

For Universal Life Products:

- a. Planned/Maturity First Year Premium Collected - Direct first year premium that is generally planned to meet the target funding of the policy, or to meet the target secondary guarantees of the policy. This premium is often commissioned at a higher first-year level.
 - b. Excess/Dump-in First Year Premium Collected - Direct first year premium that is in excess of the planned levels in part (a) above. This premium is often commissioned at a lower level.
 - c. Total First Year Premium Collected - Should equal the sum of a and b. Note that this should not be entered.
4. Single Premium Collected -

For Term and Whole Life Products:

- a. Regular non-PUA Single Premium - Premium collected on direct business that is not intended for paid-up addition riders of policies. Generally, this will come from Exhibit-1 Part 1.
- b. Paid-Up Additions (Not from Dividends) - Premium collected on direct business intended for paid-up addition riders of policies. Generally, this will come from Exhibit-1 Part 1.
- c. Total Single Premium Collected - Should equal the sum of a and b. Note that this should not be entered.

For Universal Life Products:

- a. Planned/Maturity Single Premium Collected - Direct single premium that is generally planned in order to meet the target funding of the policy, or to meet the target secondary guarantees of the policy. This premium is often commissioned at a higher level.

- b. Excess/Dump-in Single Premium Collected - Direct single premium that is in excess of the planned levels in part (a) above. This premium is often commissioned at a lower level.
- c. Total Single Premium Collected - Should equal the sum of a and b. Note that this should not be entered.

B. and C. Inforce - Direct

- 1. Number of Policies - Number of individual policies in force on direct business. Joint policies should be counted as one policy. **Numbers of riders should not be included on this line.** Generally, this will come from the Exhibit of Life Insurance.
- 2. Volume in force (Round to 1000s) - Volume in force as the face amount on the base policy plus any term rider on the primary insured. Other rider volume (with the exception of any term rider on the primary insured) should not be included in this amount. Generally, this will come from the Exhibit of Life Insurance.
- 3. Renewal Premium Collected - Premium collected on direct business. This includes **all premiums collected on the policy, including any rider premiums.** Generally, this will come from Exhibit-1 Part 1.
- 4. Reserves or Account Balances - Direct reserves. Generally, this will come from Exhibit 5.

D. Claims and Terminations

- 1. Number of Direct Claims during year - Generally, these claims will contribute to the Direct Claims that are reported in Exhibit 8.
- 2. Number of Direct Surrenders/Lapses during year- Generally, these counts will contribute to counts recorded in the Exhibit of Life Insurance.

APPENDIX F – Individual Life Insurance Expense Tabs

All expenses reported are for the specified calendar year, either 2024 or 2025.

E. Commissions Paid –Generally, this will come from Exhibit – 1 Part 2 of the NAIC Annual Statement

1. First Year Commissions, paid on direct written business

For Universal Life Products:

- a. Commission on Planned/Maturity First Year Premium - Amount of commission that was paid on premium that was planned in order to meet target funding of the policy, or to meet secondary guarantees of the policy.
- b. Commission on Excess/Dump-in First Year Premium - Amount of commission that was paid on premium that exceeded the planned levels in part (a) above.
- c. Total Commissions on First Year Premium - Should equal the sum of a and b. Note that this should not be entered.

2. Single Premium Commissions, paid on direct written business

For Term and Whole Life Products:

- a. Commissions on Regular non-PUA Single Premium - Amount of commission that was paid on premium that is not intended for paid-up addition riders of policies.
- b. Commissions on Paid-Up Additions (Not from Dividends) - Amount of commission that was paid on premium that is intended for paid-up addition of riders of policies.
- c. Total Commissions on First Year Premium - Should equal the sum of a and b. Note that this should not be entered.

For Universal Life Products:

- a. Commission on Planned/Maturity Single Premium - Amount of commission that was paid on single premium that was planned in order to meet target funding of the policy, or to meet secondary guarantees of the policy.
- b. Commission on Excess/Dump-in Single Premium - Amount of commission that was paid on single premium that exceeded the planned levels in part (a) above.
- c. Total Commissions on Single Premium - Should equal the sum of a and b. Note that this should not be entered.

3. Renewal Commissions, paid on direct written business, including any asset-based commissions.

F. Other Acquisition Expenses Paid

1. Acquisition Expenses - Sales - All expenses, other than commissions, directly paid in the acquisition of new business, including home office, field office, licensing, sales promotion, etc.
2. Acquisition Expenses - Marketing – All expenses paid for marketing products, including advertising, public relations, market research, etc.

3. Underwriting - Requirements - All expenses paid for gathering medical information, inspection reports, laboratory tests, non-medical reports, underwriting disclosures, and other similar requirements or reports.
4. Underwriting – Other - All other expenses paid in relation to underwriting.
5. Acquisition Expenses - Technology – All expenses paid for development or licensing of technology directly associated with acquisition of new business. If your company allocates technology expenses as acquisition expenses, enter the amount here. If not, enter 0.
6. Acquisition Expenses - Policy Issue - All expenses paid for the preparation and issuing of policies.
7. Acquisition Expenses - Product Development - If your company allocates product development expenses as acquisition expenses, enter the amount here. If not, enter 0. Please note in comments where product development expenses are included.
8. Acquisition Expenses - Overhead – All overhead expenses related to the acquisition of new business.
9. Other Acquisition Expenses - All other expenses paid directly related to the acquisition of new business. Do not include any overhead expenses that are included above. Please list separately and describe each significant type of expense included here. Please include direct-response acquisition-related expenses on a separate line.

G. Maintenance Expenses Paid

1. Benefits and Claim Settlement Expenses— Expenses for death, disability, and Accidental Death Benefit claims should be included, such as those expenses related to Exhibit 8 claims including internal and external staff and claim investigation.
2. Policyowner Service Expenses —All expenses paid directly related to the servicing of the underlying life insurance policies.
3. Surrender and Lapse Expenses—All expenses paid related to surrenders and lapses.
4. Maintenance Expenses - Overhead – Expenses that are not directly related to the acquisition or maintenance of policies. If there were any significant, unusual, non-recurring expenses, then report those items in G.5 (Significant Unusual Non-recurring Maintenance Expenses).
5. Significant Unusual Non-recurring Maintenance Expenses—Significant unusual expenses paid that are not expected to recur. These expenses may be related, but not limited, to development or purchase of new systems, mergers and acquisitions, demutualizations or large legal judgements. Indicate the type of expense included. Only include such an expense here if it is greater than 2% of total expenses for the line of business.
6. Other Maintenance Expenses — All other expenses paid. Please list and describe each such expense separately.

H. Premium Tax & Guarantee Association Assessments— Generally, premium tax information will come from Exhibit 3. If Premium Tax is 0, please note this in the comments section.

I. Total Expenses — Should equal the sum of E through H. Note that this should not be entered.

APPENDIX G – Individual Annuity Units Tabs

All expense units reported are for the specified calendar year, either 2024 or 2025.

References are to the NAIC Annual Statement blank. Fraternal companies should use the corresponding lines from the Fraternal blank.

A. New Business - Direct

1. Number of Contracts Issued - Number of individual contracts issued on direct business. Joint policies should be counted as one policy. **Numbers of riders should not be included on this line.** Generally, this will come from the Exhibit of Number of Policies, Contracts, Certificates, Income Payable and Account Values.
2. First Year Premium Collected – Premium collected on direct business. This includes all premiums collected on the policy, including any rider premiums. Generally, this will come from Exhibit-1 Part 1.
3. Single Premium Collected – Premium collected on direct business. This includes all premiums collected on the policy, including any rider premiums. Generally, this will come from Exhibit-1 Part 1.

B and C. Inforce - Direct

1. Number of Contracts - Number of individual contracts in force on direct business. Joint policies should be counted as one policy. **Numbers of riders should not be included on this line.** Generally, this will come from the Exhibit of Number of Policies, Contracts, Certificates, Income Payable and Account Values.
2. Renewal Premium Collected - Premium collected on direct business. This includes all premiums collected on the policy, including any rider premiums. Generally, this will come from Exhibit-1 Part 1.
3. Account Balances - Direct reserves. Generally, this will come from the Exhibit of Number of Policies, Contracts, Certificates, Income Payable and Account Values.

D. Other Units

1. Number of Full Surrenders/Lapses during the year. Generally, these counts will contribute to counts recorded in the Exhibit of Number of Policies, Contracts, Certificates, Income Payable and Account Values.
2. Number of Annuity Contracts (including supplementary contracts) for which Periodic Benefit Payments were made during the year. Generally, this will contribute to counts recorded in the Exhibit of Number of Policies, Contracts, Certificates, Income Payable and Account Values.

APPENDIX H – Individual Annuity Expense Tabs

All expenses reported are for the specified calendar year, either 2024 or 2025.

E. Commissions Paid – Generally, this will come from Exhibit – 1 Part 2 of the NAIC Annual Statement

1. First Year Commissions and Related Expenses- Commissions and related expenses paid on direct written business.
2. Single Commissions - Commissions and related expenses paid on direct written business.
3. Renewal Commissions—Commissions paid on direct written business. Include service fees paid. Asset trailing expenses should also be included.

F. Other Acquisition Expenses Paid

1. Acquisition Expenses - Sales —All expenses, other than commissions, directly paid in the acquisition of new business, including home office, field office, licensing, sales promotion, etc.
2. Acquisition Expenses - Marketing – All expenses paid for marketing products, including advertising, public relations, market research, etc.
3. Acquisition Expenses - Technology - All expenses paid for development or licensing of technology directly associated with acquisition of new business. If your company allocates technology expenses as acquisition expenses, enter the amount here. If not, enter 0.
4. Acquisition Expenses - Contract Issue—All expenses paid for the preparation and issuing of contracts.
5. Acquisition Expenses - Product Development—If your company allocates product development expenses as acquisition expenses, enter the amount here. If not, enter 0. Please note in comments where product development expenses are included.
6. Acquisition Expenses - Overhead – All overhead expenses related to the acquisition of new business.
7. Other Acquisition Expenses - All other expenses paid directly related to the acquisition of new business. Do not include any overhead expenses that are included above. Please list separately and describe each significant type of expense included here. Please include direct response acquisition related expenses on a separate line.

G. Maintenance Expenses Paid

1. Benefits Payment Expenses— Expenses related to the periodic payment of annuity benefits (including both immediate and supplementary contracts) should be included. Expenses related to surrenders, lapses, and deaths should be included in G.3 (Surrender/Lapse/Death Expenses).
2. Policyowner Services Expenses - All expenses paid directly related to the service of the underlying annuity contracts.
3. Surrender/Lapse/Death Expenses—All expenses paid related to surrenders and lapses. Include expenses related to terminations due to death. If it is not possible to separate these expenses, please include them with G.2 (Policyowner Services Expenses) and indicate in the notes section of the worksheet if included in G.2.

4. Maintenance Expenses - Overhead – Expenses that are not directly related to the acquisition or maintenance of contracts. If there were any significant unusual non-recurring expenses, then report those items in G.5 (Significant Unusual Non-recurring Maintenance Expenses).
5. Significant Unusual Non-recurring Maintenance Expenses—Significant unusual expenses paid that are not expected to recur. These expenses may be related, but not limited, to development or purchase of new systems, mergers and acquisitions, demutualizations or large legal judgements. Indicate the type of expense included. Only include such an expense here if it is greater than 2% of total expenses for the line of business.
6. Other Maintenance Expenses — All other expenses paid. Please list and describe each such expense separately.

H. Premium Tax & Guarantee Association Assessments— Generally, premium tax information will come from Exhibit 3. If Premium Tax is 0, please note this in the comments section.

I. Total Expenses — Should equal the sum of E through H. Note that this should not be entered.

APPENDIX I - LLG Governing Information Security Policy

LLG Information Technology has created and maintains a comprehensive information security program called Governing Information Security Policy for LLG. This program covers information security, risk assessment, and privacy for all LLG IT activities. The program ensures that LLG has in place adequate technical, administrative, and physical safeguards to protect sensitive information. LLG's Chief Information Security Officer is the owner of the program document, and reviews and updates it annually.

1. ZERO TRUST ARCHITECTURE MODEL

LLG's security model is centered on the belief that devices are not to automatically trusted inside or outside our perimeters. All connections must verify and continually be verified they meet a defined set of requirements before being granted access as well as ongoing access.

2. PHYSICAL SECURITY

LLG has industry best practice physical controls to protect staff, information, and guard against intrusion theft, damage, and unauthorized access. A badge reader system controls access to LLG's facilities, computer rooms, and areas where sensitive information is stored. Employees, contractors, and consultants have photo ID badges that must be prominently displayed. Visitors and third parties must be provided with badges that are prominently displayed at all times during their use of LLG's buildings. LLG IT maintains procedures to ensure that computer and communications rooms are secured and protected from fire.

3. DATA STORAGE

The physical storage location of data is Windsor, CT. The core physical infrastructure that includes physical hardware asset management, security, data protection, and networking services is managed by LLG staff. All systems are managed, monitored, and operated by LLG.

4. END-POINT PROTECTION

LLG Information Technology department develops, maintains, and revises as needed, a manual of procedures that govern the following:

- Use of software to protect the computing environment from viruses and other malicious tools
- Updating the computing environment with "patches" for known vulnerabilities
- Restricting the ability of unprotected systems to access the environment
- Installed and running on all LLG connected computers is an industry approved end-point protection software program that is updated regularly. Definitions are set to update daily.

About LIMRA

Established in 1916, LIMRA is a research and professional development not-for-profit trade association for the financial services industry. More than 600 insurance and financial services organizations around the world rely on LIMRA's research and educational solutions to help them make bottom-line decisions with greater confidence. Companies look to LIMRA for its unique ability to help them understand their customers, markets, distribution channels and competitors and leverage that knowledge to develop realistic business solutions.

Visit LIMRA at www.limra.com.

About The Society of Actuaries Research Institute

Serving as the research arm of the Society of Actuaries (SOA), the SOA Research Institute provides objective, data-driven research bringing together tried and true practices and future-focused approaches to address societal challenges and your business needs. The Institute provides trusted knowledge, extensive experience and new technologies to help effectively identify, predict and manage risks.

Representing the thousands of actuaries who help conduct critical research, the SOA Research Institute provides clarity and solutions on risks and societal challenges. The Institute connects actuaries, academics, employers, the insurance industry, regulators, research partners, foundations and research institutions, sponsors and non-governmental organizations, building an effective network which provides support, knowledge and expertise regarding the management of risk to benefit the industry and the public.

Managed by experienced actuaries and research experts from a broad range of industries, the SOA Research Institute creates, funds, develops and distributes research to elevate actuaries as leaders in measuring and managing risk. These efforts include studies, essay collections, webcasts, research papers, survey reports, and original research on topics impacting society.

Harnessing its peer-reviewed research, leading-edge technologies, new data tools and innovative practices, the Institute seeks to understand the underlying causes of risk and the possible outcomes. The Institute develops objective research spanning a variety of topics with its [strategic research programs](#): aging and retirement; actuarial innovation and technology; mortality and longevity; diversity, equity and inclusion; health care cost trends; and catastrophe and climate risk. The Institute has a large volume of [topical research available](#), including an expanding collection of international and market-specific research, experience studies, models and timely research.

Society of Actuaries Research Institute
8770 W Bryn Mawr Ave, Suite 1000
Chicago, IL 60631
www.SOA.org