

REGULATORY TREATMENT ANALYSIS SERVICE APPLICATION

PART I INSTRUCTIONS - The following guidance is offered to facilitate the Applicant's use of the Regulatory Treatment Analysis Service ("RTAS").

- About the RTAS Service** For detailed information about the RTAS service, applicants should refer to Parts Two and Four of the Purposes and Procedures Manual of the NAIC Investment Analysis Office (the "Purposes and Procedures Manual"). A copy of the Purposes and Procedures Manual can be found at content.naic.org/industry/securities-valuation-office.
- Objectives** As more fully explained in the Purposes and Procedures Manual, the NAIC Securities Valuation Office ("SVO") analyzes credit and other risks in insurer owned investments for state insurance regulators. SVO analytical conclusions drive based capital and, in certain situations, statutory accounting, reporting and other regulatory mechanisms. The RTAS service permits insurance companies and select other persons, as permitted by the Purposes and Procedures Manual, to ascertain the analytical position the SVO would take (or the recommendations it would make to NAIC member regulators) with respect to credit and other investment risks embedded in a security and the regulatory treatment that corresponds to those analytical conclusions under the existing regulatory framework. The RTAS service can be used whether the security that is the subject of the Application is of a type previously known to insurers and regulators, a modified version of a type previously known to insurers and regulators, or a security never previously known to insurers or regulators. The opinion given by the SVO in an RTAS Letter at the end of the RTAS Engagement addresses key areas of regulatory treatment including: a preliminary NAIC Design and asset classification for statutory reporting. These areas of regulatory treatment are discussed by indicating our opinion of credit risk, asset classification, and other analytical products produced as part of our regulatory function. Conclusions and opinions of the SVO discussed in the RTAS Letter are subject to modification by state insurance officials. It is also possible that an RTAS analysis may conclude that NAIC regulatory guidance is not sufficiently comprehensive to provide insurers with guidance if they purchased the security. In such a case the SVO can alert the appropriate NAIC regulator group and work with them to fashion an appropriate response.
- The Application Process** Once the Applicant has submitted Part III.C. below. Please refer to Part IIC below for fees applicable to Regulatory Transactions and Highly Customized Transactions. Following Phase I review, the SVO accepts the RTAS Engagement and defined in Part IIC below. The Applicant may proceed with a more thorough review for purposes of conducting a credit analysis (the "Phase II review"). At the completion of its Phase II review, the SVO issues an RTAS opinion pursuant to an RTAS Letter as defined in Part IIE. i. below.

placement memorandum if available at the time of this application (though, it may be required before the SVO can make a determination); issuer financial statements and any other information which the Applicant or SVO deems necessary or useful to understanding investment and other risks in the security. The SVO reserves the right to decline to review an RTAS Application if it determines, in its sole discretion, that it has insufficient information to do so.

6. Address A PDF scan

Address: If different from above: _____

THE SECURITY

1. Issuer Name: _____
[For example, ABC Corp.]
2. Issuer's SIC Code: _____
3. Full description of the security: _____
[For example, \$10,000,000 6.5% Subordinated Notes, 2026]
4. Is there a specific feature, characteristic, investment risk or other aspect of the security you wish the SVO to focus on in this analysis request? If yes, please describe (add supporting documentation if necessary):
5. Has the Applicant (or its representative) formally or informally discussed the security that is the subject of this Application with a credit rating organization (whether or not an NRSRO)? If yes, identify the credit rating organization, and the purpose and result of the discussion or submission? Add supporting documentation as necessary.
6. Securities with Regulatory Content (The Application will be rejected if this section is incomplete)

Engagement would not further NAIC objectives. If the SVO decides not to accept the RTAS Engagement, it shall so inform the Applicant. By submitting this signed Application, the Applicant acknowledges that the SVO is authorized to reject an RTAS Engagement and that the Applicant has no recourse against the SVO if it so rejects.

B. NATURE OF UNDERTAKING - The acceptance of an RTAS Engagement

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a replacement RTAS Letter to the Applicant if it deems this necessary to reflect changes in data, information, issuer financial strength, competitive environment, structure, terms, NAIC regulatory policy or any other relevant consideration that varies significantly from the data, information, NAIC regulatory policy and corresponding assumptions under which the initial RTAS opinion was derived.

iii. Right to Withdraw RTAS Letter - SVO reserves the right to withdraw an RTAS Letter whenever potential or actual changes in NAIC policy or published technical guidance shall indicate that the opinion of the SVO or of any other NAIC staff whose opinion was incorporated into the RTAS Letter or served as a basis for a conclusion, is no longer accurate. The SVO reserves the right to withdraw an RTAS Letter if the Applicant breaches the terms and conditions of the RTAS Application or the RTAS Letter.

iv. Point in Time - An RTAS Letter conveys an SVO assessment as of the date it was issued. The SVO has no obligation to revise the RTAS letter or to follow or communicate regulatory or other developments relevant to the transaction that is the subject of the Application.

F. CONFIDENTIALITY AND PERMITTED DISCLOSURES

i. Submitted Information - The confidentiality of information submitted to the SVO as part of this Application is governed by the Statement of Practice in Part Two of the Purposes and Procedures Manual

ii. The RTAS Letter - The RTAS Letter is a confidential communication between the SVO and the Applicant. The Applicant shall have permission to discuss or disseminate the RTAS Letter solely with or to its investment advisor employed in connection with this Application, if applicable, and insurers regulated by NAIC members on an individual basis provided that a copy of the entire RTAS Letter is given to the Applicant agrees that it will use the RTAS Letter in a manner that is consistent with the state insurance regulatory objectives that the RTAS service is designed to advance. The SVO analysis is designed only to advise the Applicant, insurance companies and insurance regulators of risks in securities that may impact an insurer's financial condition and that may therefore require regulatory response. The SVO disclaims that its analysis is a suitable basis upon which to sell securities or the functional equivalent of a credit rating

iii. Permitted SVO Disclosures

a. Regulatory Consultations - The SVO is the professional staff of the Valuation of Securities (E) Task Force ("VOSTF"). Under certain circumstances specified in the Purposes and Procedures Manual the SVO is obligated to consult with the VOSTF, and may do so in connection with a RTAS Application. More generally, the SVO is at all times under a professional obligation to share analytical insight and information it obtains during the course of its operations with the VOSTF or other members of the regulatory community, either to further specific charges or projects before those groups or to advise the VOSTF or the broader regulatory community of issues that may require regulatory intervention. In addition, the SVO may consult with the VOSTF as it may deem necessary or appropriate, including with respect to a security that is the subject of a RTAS Application. The SVO reserves the right to discuss any aspects of a security that is the subject of this Application privately with members of the VOSTF and NAIC the regulatory community.

b. Staff Support - NAIC Committees, Task Forces, Working Groups, subgroups or ad hoc groups are composed of state insurance officials who may determine it necessary to hold public hearings to discuss regulatory approaches to investment issues as part of the

policy formulation process. It is the responsibility of the SVO to support such groups in their deliberations by providing information about investment risks. The SVO reserves the right to share confidential information gained as a result of RTAS Application privately with regulators to assist their preparation for public hearings.

c. No Breach of Confidentiality - The Applicant agrees that SVO disclosure of information regarding the subject of this RTAS Application to NAIC members (i.e., members of state insurance departments acting as Chairs or members of NAIC Committees, Task Forces, Working Groups, Subgroups or ad hoc groups), NAIC employees (provided the employee's duties require them to have such information); and to individual state insurance regulators, is not a breach of the confidentiality of these terms and conditions.

iv. RTAS Letter Not A License to Distribute - The permission granted to the Applicant in this Application and in the RTAS Letter to discuss or disseminate the RTAS Letter with or to its investment advisor employed in connection with this Application, if applicable, and

product should be treated as if it were intended for investors generally for the purpose of buying or selling a security or other financial product as the functional equivalent of a credit rating

ii. RTAS Letter Not an Endorsement- Acceptance of this Application by the SVO, the Applicant's receipt of an RTAS Letter from the SVO, the involvement of any NAIC regulator group in determining changes to the regulatory framework to accommodate the security that