

MARKET CONDUCT EXAMINATION REPORT OF
SYMETRA NATIONAL LIFE INSURANCE COMPANY
WEST DES MOINES, IOWA
AS OF DECEMBER 31, 2020

West Des Moines, Iowa
June 3, 2024

HONORABLE DOUG OMMEN
Commissioner of Insurance
State of Iowa
Des Moines, Iowa

Commissioner:

In accordance with your authorization and pursuant to Iowa statutory provisions, a market conduct examination has been made of the records, business affairs and marketing practices of

SYMETRA NATIONAL LIFE INSURANCE COMPANY

WEST DES MOINES, IOWA

AS OF DECEMBER 31, 2020

at its Statutory Home Office, 4125 Westown Parkway, Suite 102, West Des Moines, Iowa.

INTRODUCTION

This market conduct examination report, containing applicable comments, explanations and findings, is presented herein. In general, this is a report by exception. Comments regarding practices and procedures reviewed during the examination have been omitted from the report if no improprieties were found. All unacceptable or noncomplying practices may not have been identified. The failure to identify specific company practices does not constitute acceptance of these practices.

SCOPE OF EXAMINATION

This risk-focused, market conduct examination was conducted as an examination covering the period from January 1, 2016 through December 31, 2020.

The risk-focused examination reviews internal policies, procedures, and control structures for compliance with applicable Iowa statutes and administrative rules. The examination then focuses on compliance with those policies, procedures, and control structures.

HISTORY

The Company's was incorporated as Safeco National Life Insurance Company under the laws of the State of Washington on September 4, 1979, and commenced business on September 5, 1979. Through subsequent amendments to the Articles of Incorporation, the following changes were made:

2004 – On August 2, 2004, a private investor group led by White Mountains Insurance Group, Ltd. and Berkshire Hathaway Inc. acquired Safeco Life and Investments from Safeco Corporation through an acquisition vehicle, Occum Acquisition Corp. Symetra Financial Corporation (“Symetra Financial” or “SFC”) was the resulting incorporated holding company entity formed, and the Company's name was changed to Symetra National Life Insurance Company. The Company is wholly owned by Symetra Life Insurance Company, which in turn, is a wholly owned subsidiary of Symetra Financial.

2010 - Symetra Financial became a public company and was traded on the New York Stock Exchange under the stock symbol SYA, until its acquisition by Sumitomo Life Insurance Company “Sumitomo Life” on February 1, 2016.

2014 - On July 1, 2014, the Company redomesticated from Washington to the State of Iowa following regulatory approvals from the Washington State Office of the Insurance Commissioner and Iowa Insurance Division.

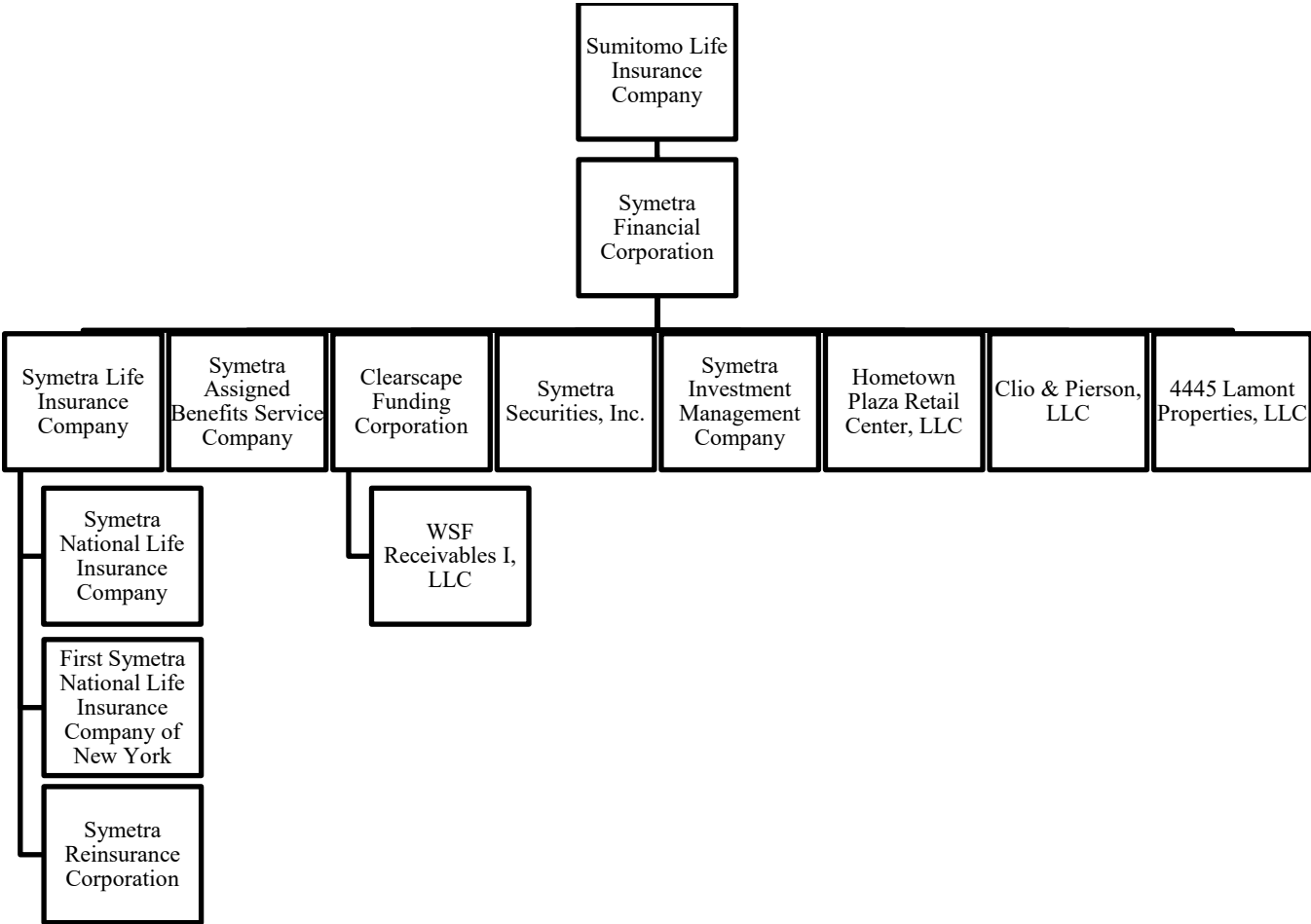
2016 - On February 1, 2016, pursuant to the Agreement and Plan of Merger, dated August 11, 2015, by and among Symetra Financial, Sumitomo Life, a mutual company (*sougo kaisha*) organized under the laws of Japan and SLIC Financial Corporation, a Delaware corporation and wholly owned subsidiary of Sumitomo Life, SLIC Financial Corporation merged with and into Symetra Financial, with Symetra Financial surviving as a wholly owned subsidiary of Sumitomo Life.

INSURANCE HOLDING COMPANY SYSTEM

The Company is a member of an Insurance Holding Company System as defined by Chapter 521A, Code of Iowa, and is a wholly owned subsidiary of Symetra Life Insurance Company, which in turn is a wholly owned subsidiary of Symetra Financial Corporation, a Delaware corporation. The Company's ultimate parent is Sumitomo Life Insurance Company, a mutual life insurance company in Japan.

Symetra Financial Corporation is a financial services company in the life insurance industry that offers an array of employee benefits, annuities, and life insurance products through its direct and indirect subsidiaries.

An organizational chart identifying the companies within the Holding Company System is as follows:



TERRITORY AND PLAN OF OPERATION

The Company was authorized to transact business in the District of Columbia and all states, except for the following: Alaska, Hawaii, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, Vermont, and Wyoming, as of December 31, 2020.

The Company has sold no new business since 1988. The Company services in-force blocks of individual life insurance business. The Company also reinsures a block of guaranteed universal life insurance policies from its parent, Symetra Life Insurance Company.

TREATMENT OF POLICYHOLDERS

Claim Practices

The Company has an older block of individual life insurance business that is in run-off. Examiner passed on claim sampling. No concerns were noted with the Company's policies and procedures, nor complaint trends related to this block.

Complaints

Examiners reviewed the Company's complaint handling policies and procedures. Complaints are handled and addressed by designated complaint management teams within each product division to be addressed. Examiners found the complaint register to be in compliance with applicable state statutes. Examiners did not review consumer complaints of SNLIC during the exam period.

Underwriting

The Company has sold no new business since 1988. The Company services in-force blocks of individual life insurance business. The Company also reinsures a block of guaranteed universal life insurance policies from its parent, Symetra Life Insurance Company. The Company does not issue any new life or annuity products. Therefore, no samples were examined.

CONCLUSION

Acknowledgment is hereby made of the cooperation and assistance extended by the officers and employees of the Group during this examination.

In addition to the undersigned, Jan Jones, examiner for the Iowa Insurance Division, participated in the examination and preparation of this report.

Respectfully submitted,

/s/ Amanda Theisen
AMANDA THEISEN, CFE, PIR, MCM
Examiner-in-Charge
Insurance Division
State of Iowa