

**EXHIBIT A: INDEX PURSUANT TO IAC r. 191-46.3(2)(i)**

**IAC r. 191-46.4(1)a:**

The Articles of Incorporation of Grinnell Mutual Holding Company, attached as Exhibit C, provide at Article I for the creation of a mutual insurance holding company. The Articles of Incorporation of Grinnell Mutual Reinsurance Company, SI., attached as Exhibit H, reorganize the present mutual into a stock insurer. All the stock of Grinnell Mutual Reinsurance Company, SI will be owned Grinnell Mutual Holdings, Inc., an intermediate stock holding company, and, in turn, all of Grinnell Mutual Holdings, Inc' stock will be owned by Grinnell Mutual Holding Company. Exhibit B, Plan of Reorganization at ¶ 4; see also Exhibit E, Form A at Item 2.

**IAC r. 191-46.4(1)b:**

The present policyholders of the mutual insurer will be protected by becoming members of Grinnell Mutual Holding Company with all rights as members that they had as policyholders of Grinnell Mutual Reinsurance Company. Exhibit B, Plan of Reorganization at ¶ 2; Exhibit C, Articles of Incorporation of Grinnell Mutual Holding Company at Article IV, and Exhibit D, By-Laws of Grinnell Mutual Holding Company at Article II.

**IAC r. 191-46.4(1)c:**

Existing policyholders of the mutual insurer will become policyholders of the reorganized stock insurer and immediate members of the mutual insurance holding

company. Exhibit C, Articles of Incorporation of Grinnell Mutual Holding Company at Article IV.

**IAC r. 191-46.4(1)d:**

Future policyholders of the reorganized stock insurer will become members of the mutual insurance holding company. Exhibit C, Articles of Incorporation of Grinnell Mutual Holding Company at Article IV.

**IAC r. 191-46.4(1)e:**

At least two-thirds (2/3) directors of the mutual insurance holding company must be policyholders of the reorganized stock insurer or a future reorganized stock insurer the becomes a part of the mutual insurance holding company system. Exhibit C, Articles of Incorporation of Grinnell Mutual Holding Company at Article XI, Section 4.

**IAC r. 191-46.4(1)f:**

In the event of insolvency, the assets of the mutual insurance holding company are available for the policyholders of the reorganized stock insurer. Iowa Code § 521A.14(4).

**IAC r. 191-46.4(1)g:**

If the Board of Directors of the mutual insurance holding company determines that the accumulation of earnings is in excess of that which it deems necessary, the Board of Directors may cause all or a part of such excess to be returned to members or it may

waive any dividends or distributions from the reorganized insurance company on the condition that such amounts will be applied for the benefit of policyholder members. Exhibit C, Articles of Incorporation of Grinnell Mutual Holding Company at Article VIII, Section 2.

**IAC r. 191-46.4(1)h:**

The format for the annual report to members is attached as Exhibit Q.