

CONFLICT OF INTEREST BOARD RESOLUTION

RESOLVED, pursuant to Iowa Administrative Code 191-113.17(1), each captive company licensed in Iowa is required to adopt a conflict of interest statement for officers, directors, and key employees disclosing that the individual has no outside commitments, personal or otherwise, that would divert the individual from their duty to further the interests of the captive company that the individual represents, but that this shall not preclude a person from being a director or officer in more than one insurance company.

FURTHER RESOLVED, that the Company hereby adopts such a conflict of interest statement for its officers, directors, and key employees, and pursuant to Iowa Administrative Code 191-113.17(2), each officer, director, and key employee shall file a yearly disclosure with the board of directors.

ANNUAL CONFLICT OF INTEREST STATEMENT

_____ (the "Company"), pursuant to Iowa Administrative Code 191-113.17(1), adopted a conflict of interest statement for its officers, directors, and key employees such that such individuals shall disclose they have no outside commitments, personal or otherwise, that would divert the individuals from their duty to further the interests of the Company, but that this conflict of interest statement shall not preclude a person from being a director or officer in more than one insurance company.

The undersigned, an officer, director, or key employee of the Company, hereby files this yearly disclosure with the Company's board of directors, and the individual discloses he/she has no outside commitments, personal or otherwise, that would divert the individuals from their duty to further the interest of the Company, but that this conflict of interest shall not preclude the undersigned from being a director or officer in more than one insurance company.

Signature

Name: _____

Title: _____

Date: _____