

MARKET CONDUCT
EXAMINATION REPORT OF
SYMETRA LIFE INSURANCE COMPANY
WEST DES MOINES, IOWA
AS OF DECEMBER 31, 2016

West Des Moines, Iowa
February 20, 2017

HONORABLE DOUG OMMEN
Commissioner of Insurance
State of Iowa

Commissioner:

In accordance with your authorization and pursuant to Iowa statutory provisions, a risk-focused market conduct examination has been made of the business practices of

SYMETRA LIFE INSURANCE COMPANY

WEST DES MOINES, IOWA

AS OF DECEMBER 31, 2016

The statutory home office is located at 4125 Westown Parkway, Suite 102, West Des Moines, Iowa 50266.

INTRODUCTION

This 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. Symetra Life Insurance Company, hereinafter referred to as the "Company", is domiciled and licensed as a stock life insurance company in the State of Iowa.

SCOPE OF EXAMINATION

The risk-focused, market conduct examination covers the intervening period from January 1, 2010 through December 31, 2016. It was conducted and performed solely for the Iowa Insurance Division by its examiners. A risk-focused examination reviews and evaluates the insurer's business processes and controls related to statutory compliance and unfair trade practices.

HISTORY

The Company was incorporated as General Life Company of America under the laws of the State of Washington on January 23, 1957, and commenced business on April 5, 1957.

The Company name was changed in 1959 to LIFECO Insurance Company of America, and in 1964, the Company name was changed to Safeco Life Insurance Company. Safeco Life Insurance Company was part of Safeco Life and Investments, which was one of the main business lines of Safeco Corporation.

Effective August 2, 2004, a private investor group led by White Mountains Insurance Group, Ltd. "White Mountains" and Berkshire Hathaway Inc. acquired Safeco Life and Investments from Safeco Corporation through an acquisition vehicle, Occum Acquisition Corp. Symetra Financial Corporation "Symetra Financial" was the resulting incorporated holding company entity formed, which wholly owns the Company, and the Company name was changed to Symetra Life Insurance Company.

In 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 on February 1, 2016.

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.

RISK FOCUSED PROCEDURES

The risk-focused exam reviews the Company's internal policies procedures, and control structures for compliance with applicable Iowa Codes and Administrative Rules. The exam then focuses on the Company's compliance with those policies, procedures and control structures. The following areas of operations were reviewed as a part of the risk-focused exam process:

Complaints - This portion of the exam is designed to provide a view of how the regulated entity treats individuals who have filed complaints with the Company and whether that treatment is in compliance with applicable statutes, rules and regulations. The N.A.I.C. definition of a complaint is "any written communication that expresses dissatisfaction with a specific person or entity subject to regulation under the state's insurance laws".

Marketing and Sales - This portion of the examination is designed to evaluate the representations made by the regulated entity about its product(s) or services.

Producer Licensing - This portion of the examination is designed to test a regulated entity's compliance with state producer licensing laws and rules.

Policyholder Services - The policyholder service portion of the examination is designed to evaluate a regulated entity's compliance with statutes regarding policy issuance/cancellation, premium notice/billing/refund, consumer inquiry delays/no response and coverage questions.

Claim Practices - The claims portion of the examination is designed to provide a view of how the regulated entity treats claimants and whether that treatment is in compliance with applicable statutes, rules and regulations.

Underwriting Practices - The underwriting portion of the examination is designed to provide a view of how the regulated entity treats the public and whether that treatment is in compliance with applicable statutes, rules and regulations

Based on the Company's response to questionnaires, review and evaluation of supporting documentation, and information gained from other regulatory agencies, this examination focused on the policies and procedures. Examination procedures including personnel interviews, review of policy and procedure documentation, assessment of self-audits and review of third-party contractual obligations were developed to assess the Company's practices. Claim and complaint sampling was completed. The company was found to be in compliance with established policies and procedures.

Respectfully submitted,

/s/ Lindsay Bates
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Insurance Examiner Specialist
Iowa Insurance Division
State of Iowa