

**Uniform Certificate of Authority Application (UCAA)
 Primary Application Checklist
 For Primary Application Only**

The application checklist is intended to help guide you with assembling your complete Primary Uniform Certificate of Authority Application (UCAA). Please be sure to complete the checklist by appropriately marking the boxes on the left side of the page prior to submitting your application for review. The completed checklist should be attached to the top of the application.

Regulator Use Only

1. **Application Form**, containing:

- Completed Primary Application Checklist (Form 1P)
- Original UCAA Primary Application executed and signed (Form 2P)
- Include all lines of insurance applicant is licensed to transact, currently transacting and requesting authority to transact in all jurisdictions. (Form 3).

2. **Filing Fee** (pursuant to Section II Filing Requirements Item 2) containing:

- Payment of required filing fee
 - Copy of check
- Not as of 1/16/2014*

3. **Minimum Capital and Surplus Requirements** (pursuant to Section II Filing Requirements Item 3)

- Provide explanation of compliance with minimum capital & surplus requirements for state for which application is prepared

4. **Statutory Deposit Requirements** (pursuant to Section II Filing Requirements Item 4)

- An original Certificate of Deposit prepared by state of domicile (Form 7)

5. **Name Approval** (pursuant to Section II Filing Requirements Item 5)

- Evidence of name approval request
- NA*

6. **Plan of Operation** (pursuant to Section II Filing Requirements Item 6)

- Completed Questionnaire (Form 8)
 - Pro Forma
 - Narrative
- Exhibit 6-13*

See exhibits excluded

7. **Holding Company Form "B" Registration Statement** (pursuant to Section II Filing Requirements Item 7)

- Included statement
- ON FILE WITH OIC - Dec 2012 Amendment NOV 2013*

8. **Statutory Membership(s)** *Note: Applicant already listed to write in Iowa*

- Submit documentation as listed in Section II Filing Requirements Item 8

see section 9

9. **SEC Filings or Consolidated GAAP Financial Statement**

- Submit documentation as listed in Section II Filing Requirements Item 9
- provided https addresses*

10. **Debt-to-Equity Ratio Statement**

- Submit documentation as listed in Section II Filing Requirements Item 10

See Exhibits Excluded

Filing Requirements – Redemestications Only

The requirements of this section are only for those insurers seeking to redomesticate from one state to another and are in addition to the requirements of Section II, items 1-14 of the Primary Checklist. A Redomestication is defined as the process where any insurer organized under the laws of any other state may become a domestic insurer that transfers its domicile to another state by merger or consolidation or any other lawful method. The Primary Application when used for a redomestication is filed with the insurer's new state of domicile.

15. **Annual Statement with Attachments**

Submit documentation as listed in Section III, Filing Requirements Item 1

16. **Quarterly Statements**

Submit documentation as listed in Section III, Filing Requirements Item 2

17. **Risk Based Capital Report**

Submit documentation as listed in Section III, Filing Requirements Item 3

18. **Independent CPA Audit Report**

Submit documentation as listed in Section III, Filing Requirements Item 4

19. **Reports of Examination**

Submit documentation as listed in Section III, Filing Requirements Item 5

20. **Certificate of Compliance (pursuant to Section III, Filing Requirements Item 6)**

Original certification of compliance (Form 6) completed by domiciliary state insurance regulatory agency.

SCHEDULE I

Exhibits Excluded from the Enclosed Application

The following exhibits are excluded from the copy of the Application enclosed herewith, as each of these exhibits is already on file with the Washington Office of the Insurance Commissioner:

①	6-15.7	Investment Management Agreement with White Mountains Advisors, LLC	✓
②	6-22.1	Services and Shared Expenses Agreement	✓
	6-22.2	Administrative Services Agreement	✓
	6-22.3	Intercompany Short-Term Lending Agreement	✓
	6-22.4	Intercompany Short-Term Borrowing Agreement	34476
⑤	6-22.5	Asset Allocation Models Service Agreement	✓
④	6-22.6	Underwriting/Administrative Management Agreement	✓
⑦	6-22.7	Suitability Review Service Agreement	✓
	6-22.8	Life Company Subgroup Tax Agreement	✓
	6-22.9	Non-Life Subgroup Tax Agreement	✓
	7-A	Annual Form B Insurance Holding Company System Registration Statement as of December 31, 2012	✓
	7-B	Amendment No. 1 to 2012 Annual Form B Insurance Holding Company System Registration Statement as of November 13, 2013	✓
	11-A	Domestic Custody Agreement between Symetra Life Insurance Company and JPMorgan Chase Bank, N.A.	✓
	11-B	Global Custody Rider between Symetra Life Insurance Company and JPMorgan Chase Bank, N.A.	✓
⑤	14-C.1	Asset Allocation Models Service Agreement, non-disapproved by letter dated September 5, 2013	✓
①	14-C.2	Investment Management Agreement, non-disapproved by letter dated May 6, 2011	✓
②	14-C.3	Amendment No 1. to the Investment Management Agreement, non-disapproved by letter dated February 17, 2012	✓
②	14-C.4	Services and Shared Expenses Agreement, non-disapproved by letter dated December 15, 2005	✓
②	14-C.5	Amendment No. 1 to the Services and Shared Expenses Agreement, non-disapproved by letter dated June 22, 2010	✓
⑫	14-C.6	Amendment No. 2 to the Services and Shared Expenses Agreement, non-disapproved by letter dated February 22, 2012	✓
⑦	14-C.7	Suitability Review Service Agreement, non-disapproved by letter dated March 21, 2013	✓
④	14-C.8	Underwriting/Administrative Management Agreement, non-disapproved by letter dated December 21, 2010	✓
	15-A	Annual Statement of Symetra Life Insurance Company as of December 31, 2012	✓
	15-B	Annual Statement of Symetra Life Insurance Company as of December 31, 2011	✓

15-C	Annual Statement of Symetra Life Insurance Company as of December 31, 2010	✓
15-D	Valuation of the outstanding policies of the Applicant as of December 31, 2012, and certification of the Washington Office of the Insurance Commissioner	9A0 ✓
15-E	Annual Statement of Symetra Life Insurance Company Separate Accounts as of December 31, 2012	✓
15-F	Annual Statement of Symetra Life Insurance Company Separate Accounts as of December 31, 2011	✓
15-G	Annual Statement of Symetra Life Insurance Company Separate Accounts as of December 31, 2010	✓
16-A	Quarterly Statement of Symetra Life Insurance Company as of March 31, 2013	✓
16-B	Quarterly Statement of Symetra Life Insurance Company as of June 30, 2013	✓
16-C	Quarterly Statement of Symetra Life Insurance Company as of September 30, 2013	✓
17	Symetra Life Insurance Company Risk-Based Capital Report for the Year 2012	✓
18	Audited Financial Statements of Symetra Life Insurance Company for the Years Ended December 31, 2012 and 2011	✓

The following exhibits are excluded from the copy of the Application enclosed herewith, as each of these exhibits contains information that constitutes a "trade secret" under applicable law¹:

6-B	Pro-Forma Financial Statement
6-16.1	Sales Agreement for Fixed Products
6-16.2	Sales Agreement for Fixed Products
6-16.3	Sales Agreement for Fixed Group Products
6-16.4	Sales Agreement for Fixed Products
6-16.5	Sales Agreement for Variable Products
6-16.6	Private Placement Agreement for Unregistered Variable Life Policies
10	Debt-to-Equity Ratio Statement

In addition, the "Supplemental Personal Information" portion of the biographical affidavits, which are attached to the Application as Exhibit 13, are excluded from the copy of the Application enclosed herewith, as the information contained therein is of a personal nature that is not otherwise available to the public.

¹ Trade Secrets are defined by RCW § 19.108.010(4) follows: "Information, including a formula, pattern, compilation, program, device, method, technique, or process that: (a) Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy."