

Completed Questionnaire

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**Uniform Certificate of Authority Application
QUESTIONNAIRE**

Directions: Each "Yes" or "No" question is to be answered by marking an "X" in the appropriate space. All questions should be answered. If an applicant denotes a question as "Not Applicable" (N/A) an explanation must be provided. Other answers and additional explanations or details may be provided in writing attached to the questionnaire. Please complete this form and file it with the company's application for a Certificate of Authority.

- 1. I hold the position(s) of Senior Vice President, General Counsel & Secretary with the applicant.
- 2. A. Has the applicant transferred or encumbered any portion of its assets or business, or has its outstanding capital stock been directly or indirectly pledged?
Yes ___ No X
- B. Has the applicant merged or consolidated with any other company within the last five Years?
Yes ___ No X

If the answer to either question is yes, provide the details in writing and attach to the Questionnaire.

- 3. Is applicant presently negotiating for or inviting negotiations for any transaction described above?
Yes ___ No X

If yes, provide the details in writing and attach to the Questionnaire.

- 4. Has the applicant ever changed its name?
Yes X No ___

If Yes, attach copies of the instruments effecting such transaction certified by the Secretary over corporate seal as a true copy of the originals, including any official state regulatory approvals and filing data.

Please refer to Exhibit 6-4. Official state regulatory approvals and filing data are included with respect to applicant's most recent name change from Safeco Life Insurance Company to Symetra Life Insurance Company, effective September 1, 2004.

- 5. A. Has the applicant undergone a change of management or control since the date of its latest annual statement filed in support of this application?
Yes ___ No X
- B. Does the applicant contemplate a change in management or any transaction that would normally result in a change of management within the reasonably foreseeable future?
Yes ___ No X

If the answer to either question is yes, provide the details in writing and attach to the Questionnaire.

- 6. Is applicant owned or controlled by a holding corporation?
Yes X No ___

A. If yes, attach and make a part hereof an affidavit by an executive officer of the applicant who knows the facts listing the principal owners (10% or more of the outstanding shares) of such holding corporation by name and residence address, business occupation and business affiliations.

Please refer to Exhibit 6-6.

- 7. Is applicant owned, operated or controlled, directly or indirectly, by any other state, or province, district, territory or nation or any governmental subdivision or agency?

Yes ___ No X

If yes, provide the details in writing and attach to the Questionnaire

8. A. Has the applicant's certificate of authority to do business in any state been suspended or revoked within the last ten years?

Yes ___ No X

- B. Has its application for admission to any state been denied within the last ten years?

Yes ___ No X

If the answer to either question is yes, provide the details in writing and attach to the Questionnaire.

9. Has any person who is presently an officer or director of applicant been convicted on, or pleaded guilty or nolo contendere to, an indictment or information in any jurisdiction charging a felony for theft, larceny or mail fraud or, of violating any corporate securities statute or any insurance statute?

Yes ___ No X

If yes, provide the details in writing and attach to the Questionnaire.

10. Is applicant presently engaged in a dispute with any state or federal regulatory agency?

Yes ___ No X

If yes, provide the details in writing and attach to the Questionnaire.

11. Is applicant a plaintiff or defendant in any legal action other than one arising out of policy claims?

Yes X No ___

If yes, provide a summary of each case and an estimate of company's probable liability, if any, and attach to the Questionnaire.

A summary of legal actions is attached as Exhibit 6-11.

12. Does the applicant purchase investment securities through any investment banking or brokerage house or firm from whom any of applicant's officers, directors, trustees, investment committee members or controlling stockholders receive a commission on such purchases?

Yes ___ No X

If yes, provide the details in writing and attach to the Questionnaire.

13. Is applicant a

- A. Bank,

Yes ___ No X

- B. Bank holding company, subsidiary or affiliate

Yes ___ No X

- C. Financial holding company

Yes ___ No X

- D. Other financial institution

Yes ___ No X

If yes, identify the bank(s), bank holding company(ies) or financial institution and the affiliation of the applicant. Provide the details in writing and attach to the Questionnaire.

14. Has the applicant, within 18 months last preceding the date of this affidavit, done any of the following?:
- A. Made a loan to an entity owned or controlled directly or through a holding corporation by one or more of applicant's officers, directors, trustees or investment committee members, or to any such person?
Yes ___ No X
 - B. Sold or transferred any of its assets or property, real or personal, to any such entity or person?
Yes ___ No X
 - C. Had its outstanding capital stock directly or indirectly pledged for the debt of an affiliate?
Yes ___ No X
 - D. Purchased securities, assets or property of any kind from an entity owned or controlled by one or more of applicant's officers, directors, trustees, or any persons who have authority in the management of applicant's funds (including a controlling stockholder)?
Yes ___ No X

If the answer to any of the last four questions is affirmative, did any officer, director, trustee or any person who had authority in the management of applicant's funds (including a controlling stockholder) receive any money or valuable thing for negotiating, procuring, recommending or aiding in such transaction?

Yes ___ No ___

If yes, provide the details in writing and attach to the Questionnaire.

15. Attach an organizational depiction (in the format of a flow chart) showing the various executive management and directors offices and related material functions that require internal control oversight of the applicant, with the name and official title of those responsible for those offices/functions and the portions of the organization they oversee. Material functions should include, but are not limited, to underwriting, claims adjustment/payments, premium accounting, claims accounting, marketing, financial reporting, and investment management. Note any executive or key staff that have access to funds or bank accounts. Submit a map or narrative explaining where offices are geographically located and the approximate number of employees at each location.

An executive management chart for the applicant is attached as Exhibit 6-15.1. In addition, management charts for the applicant's Retirement Division, Life Division and Benefits Division are attached as Exhibit 6-15.2, Exhibit 6-15.3, Exhibit 6-15.4, respectively.

A map showing where offices are geographically located and the approximate number of employees at each location as of May 2013 is attached as Exhibit 6-15.5.

A list of executive or key staff that have access to funds or bank accounts is included as Exhibit 6-15.6.

- A. Designate any common facilities and/or any of the above functions that are shared with affiliates.

The applicant shares common facilities with all of its affiliates, and shares the functions listed in Item 15 above with its insurance company affiliates, Symetra National Life Insurance Company and First Symetra National Life Insurance Company of New York.

- B. Designate any of the above office/functions that are delegated to third parties;

The applicant, together with its affiliates Symetra Financial Corporation, Symetra National Life Insurance Company, First Symetra National Life Insurance Company of New York, and TIF Invest III, LLC, has contracted with White Mountains Advisors LLC, a related party, to invest the majority of its

investment portfolio, other than the applicant's commercial mortgage portfolio, which is managed by the applicant's commercial mortgage loan department. In addition, Symetra Financial Corporation has contracted on behalf of itself and the applicant with Prospector Partners, LLC to manage a significant portion of the applicant's equity focused portfolio, composed primarily of common stock and convertible securities.

- C. Attach copies of signed agreements for office functions delegated to either affiliates or third parties.

The following agreements are attached as indicated:

Investment Management Agreement with White Mountains Advisors LLC Exhibit 6-15.6

Investment Management Agreement with Prospector Partners, LLC Exhibit 6-15.7

- D. As applicable, attach a separate chart reflecting any other management positions (if different than what was noted above) that exercise control over insurance operations in other jurisdiction where the applicant company is seeking admission.

Not applicable.

- E. Attach any similar information that was submitted to lenders or investment partners.

No similar information has been provided to lenders or investment partners.

16. Provide a detailed description of the applicant's sales techniques. The description should include:

- A. Information regarding recruitment and training of sales representatives.

The applicant does not have captive agents. The applicant distributes its products through third party distributors with whom the applicant has sales agreements who, in accordance with the terms of the applicable sales agreement, are required to supervise and train sales representatives.

Symetra provides product specific training through Kaplan Professional which must be completed in order to submit business. Symetra also maintains a national wholesaling team supplemented by an internal sales desk that provides one-on-one and group training designed to complement the Kaplan Professional training.

- B. Identification as to whether the applicant will be a direct writer or will use agents, brokers or a combination thereof.

The applicant uses agents, brokers or a combination thereof.

- C. Explanation of the compensation and control to be provided by the applicant to its agents, brokers or sales personnel.

The applicant does not have captive agents. The applicant distributes its products through third party distributors. The applicant will pay the third party distributor directly in accordance with compensation schedules that are part of the applicable sales agreement. Prior to paying compensation, Symetra reviews to ensure that an active selling agreement and the appropriate licenses are in place.

- D. Sample copies of any agreements entered into between the applicant and its agents or brokers.

The following exhibits, which provide a representative sample of the agreements entered into between the applicant and its agents or brokers, are provided to the Division as follows:

Sales Agreement for Fixed Products (base commission rates)

Exhibit 6-16.1

| | |
|---|----------------|
| Sales Agreement for Fixed Products (override commission rates) | Exhibit 6-16.2 |
| Sales Agreement for Fixed Group Products | Exhibit 6-16.3 |
| Sales Agreement for Fixed Products | Exhibit 6-16.4 |
| Sales Agreement for Variable Products | Exhibit 6-16.5 |
| Private Placement Agreement for Unregistered Variable Life Policies | Exhibit 6-16.6 |

- E. If the applicant will use a specific agency or managing general agent, identification of the agency or managing general agent and a copy of the agreement for this arrangement.

The applicant distributes its products through sales agreements with a number of third party distributors including a number of agencies and managing general agents.

- F. Sample contract forms of all types used and remuneration schedule, including those for general agents, if any.

Please refer to Exhibits 6-16.1, 6-16.2, 6-16.3, 6-16.4, 6-16.5, and 6-16.6, which provide a representative sample of the contract forms used by applicant.

17. For each state in which the applicant is filing explain:

- A. The product lines currently sold or planned by the applicant,

The applicant divides its products into three distinct divisions, as follows:

- The Retirement Division provides fixed deferred annuities (including indexed annuities), variable deferred annuities and single premium immediate annuities (SPIAs) as its principal products. In addition, the Retirement Division services the applicant's block of structured settlement policies.
- The Individual Life Division, provides universal life (UL) insurance, including bank-owned life insurance (BOLI), and term life insurance as its principal products. In 2012, the applicant also began offering a Corporate-owned Life Insurance (COLI) product.
- The Benefits Division provides medical stop-loss insurance, limited benefit medical insurance and group life and disability income (DI) insurance as its principal products.

- B. Specialty line or lines currently sold and planned,

Not applicable.

- C. Captive business,

The applicant does not currently utilize any captive arrangements, however, applicant intends to finance certain statutory reserve amounts associated with universal life insurance products with secondary guarantees. The contemplated financing of such reserve amounts may utilize captive arrangements.

- D. The applicant's marketing plan, including a description of the financial, corporate or other connections productive of insurance,

Retirement products are marketed and sold primarily through financial institutions. Individual life products are marketed and sold primarily through retail channels, including financial institutions, brokerage general agents and independent agents. Group benefits products are marketed and sold through the applicants relationships with third party administrators (TPAs), employee benefits brokers, consultants and administrative services only (ASO) insurance carriers.

The applicant will market its products to its distribution partners through email, collateral materials, videos, internal and external wholesalers, due diligence meetings, and trade shows.

E. The applicant's current and expected competition (both regionally and nationally) and

The applicant expects to face significant competition for customers and distributors from insurance and other non-insurance financial services companies, such as banks, broker-dealers and asset managers. Generally, the applicant's life insurance, annuity and group benefits products will compete with similar products offered by other large and highly rated insurers. In addition, the applicant's annuity products will compete with products offered by other financial services companies.

F. How each state in which admission has been requested fits into the marketing plan. General description of the classes to be transacted is not an adequate response. For example, if the applicant plans to market credit life and disability products tailored for use by credit unions, simply stating that it will transact credit life and disability is inadequate.

The applicant is already licensed to write life insurance in 49 states and the District of Columbia, and intends to continue its existing marketing plan following redomestication.

18. If a parent, subsidiary and/or affiliated insurer is admitted for the classes of insurance requested in the pending application, please differentiate the products and/or markets of the applicant from those of the admitted insurer(s).

A UCAA Expansion Application for the applicant's subsidiary insurance company, Symetra National Life Insurance Company, has been submitted concurrently with this application. Following receipt of a certificate of authority from the Iowa Division of Insurance, Symetra National Life Insurance Company will file a redomestication application with the Iowa Division of Insurance.

Symetra National Life Insurance Company does not currently write business, and there are no current plans for it to write business.

19. Provide a detailed description of the advertising that will be used by the applicant to market its products in each state. Include a detailed explanation as to how the applicant will develop, purchase, control and supervise its advertising.

The applicant will utilize its marketing department to develop marketing materials to promote its products to its distribution partners. Marketing materials will be delivered to distribution partners through email, collateral materials, videos and trade shows. All marketing materials will be submitted for legal and/or compliance review by the Law Department and/or Compliance Department. The form and content of all marketing materials must be approved by the Law Department and/or Compliance Department prior to use.

In addition, in July of 2013, the applicant launched a national ad campaign that includes print, mobile and online advertising with Sports Illustrated. The applicant will also be broadcasting a television commercial during select sporting events. These ads are brand-focused and are geared to drive awareness of the name "Symetra." The advertising materials were developed in conjunction with Copacino+Fujikado, an advertising agency retained by the applicant.

All materials developed in furtherance of the applicant's branding strategy are reviewed and approved by the Brand Department and the Compliance Department and/or Law Department prior to use.

20. For each State, explain in detail the following:

A. How the applicant's policies will be underwritten, including the issuance of policies and endorsements,

The applicant's process for underwriting and issuing policies and endorsements will not change as a result of its redomestication.

A brief discussion of the applicant's underwriting process in all states for products within each of applicant's divisions follows:

- The Retirement Division considers expectations for mortality and longevity in pricing its deferred annuities. Immediate annuities are priced using industry produced annuity mortality information, applicant's own mortality experience and assumptions regarding continued improvement in annuitant longevity. Products with life contingencies may be underwritten in applicant's medical department by medical doctors and other trained medical personnel.
- The underwriting process utilized by the applicant's Individual Life Division places each insurable life insurance applicant in one of six primary risk categories, depending upon current health, medical history and other factors. Each of these six categories has specific health criteria, including the individual's history of using nicotine products. The applicant considers each life insurance application individually and applies underwriting guidelines to place each applicant in the appropriate risk category. An individual's request for coverage may be denied if the individual's health or other risk factor assessment is unacceptable. The applicant does not delegate underwriting decisions to independent sales intermediaries. Instead, all underwriting decisions are made by applicant's own underwriting personnel or by our automated underwriting system. In certain markets where fully underwritten products are not preferred by the distributor, we have developed specially priced products to support a "simplified issue" process. This process enables us to reach customers not called on by traditional insurance agents. "Simplified issue" contracts are typically generated via worksite sales to employees and sales to retail bank customers. Insurance amounts are limited and separate underwriting guidelines are applied for simplified issue policies.
- The underwriting process utilized by the applicant's Benefits Division reflects the employer group's claims experience and risk characteristics. The employer group's claims experience is reviewed at the time the policy is issued and each renewal year thereafter, resulting in ongoing adjustments to pricing. Medical stop loss policies are renewed annually, while group life and disability policies are frequently sold with multi-year rate guarantees. For both medical stop loss policies and group life and disability policies, the key pricing and underwriting criteria considered are the employer group's demographic composition (including the age, gender and family composition of the employer group's members), the employer's industry, plan design and prior claims experience. In addition, medical cost trends, the employer's selected provider network discount structure, geographic location and regional economic trends are considered in the underwriting of medical stop-loss policies.

B. How policies will be cancelled,

The applicant's process for cancelling policies and contracts will not change as a result of its redomestication.

The process for cancelling policies and contracts involves the following for all states:

- The applicant's policies contracts have been filed with termination and cancellation provisions and have been approved by the applicable regulatory authorities. Terminations and cancellations are processed according to the terms of these provisions by applicant's internal personnel working in applicant's offices located throughout the U.S.
- Upon receipt of a cancellation request form, a processor receives the form and reviews it to ensure that it is in good order (e.g., properly signed, contains all necessary information, and does not raise any other concerns). If the request is not in good order, a call is made to the client for the necessary information.
- If the cancellation request is received within the "free look" period specified within the policy or contract (or any longer period required by applicable law), and the cancellation request is in good order, it is processed according to the "free look" provisions, and the deposited funds and/or paid premiums are returned to the client without penalty.

- If the cancellation request is received beyond the “free look” period specified within the policy or contract (or any longer period required by applicable law), and the cancellation request is in good order, the processor evaluates the cancellation request based on the contractual agreement and handles according to applicable provisions in the policy or contract. Any funds owed to the client are sent directly to the client.
- All cancellations go through a quality assurance process and funds over certain thresholds need to be reviewed by a manager prior to processing.

C. How premiums and other funds will be handled and

The applicant’s process for handling premium and other funds will not change as a result of its redomestication.

In general, the process for handling premium and other funds involves the following for all states:

- All physical checks from clients for premium and other funds are deposited promptly by applicant’s or its designated third-party administrator’s employees at the mail processing location where the physical check was received in a designated applicant bank account. The funds are then applied to client accounts by applicant’s employees or by third-party administrators’ employees.
- In certain lines of business, premiums may be processed electronically and all electronic payments are wired or otherwise electronically processed through the applicant’s designated bank account and then applied to client accounts by applicant’s employees or by third-party administrators’ employees;
- Premiums and other funds related to applicant’s medical stop-loss insurance, limited benefit medical insurance and group life and disability income (DI) insurance are collected via lock box located at a major U.S. bank where they are immediately deposited into applicant’s suspense accounts and processed by applicant’s internal personnel working in applicant’s offices located throughout the U.S.

D. How personnel will be trained, supervised, and compensated.

The applicant’s process for training, supervising and compensating personnel will not change as a result of its redomestication.

In general, the process for training, supervising and compensating personnel involves the following for all states:

- Training of applicant’s personnel is done through the applicant’s human resources department, desk-level procedures and mentoring from managers within applicant’s Retirement Division, Life Division and Benefits Division, as applicable.
- Training encompasses, among other topics, Security, Anti-Money Laundering, Privacy, Non-Discrimination and Conflict of Interest guidelines as well as internal processing rules and procedures based upon those guidelines.
- All employees are located in the U.S. based and are trained and supervised by management personnel located in the U.S.
- Compensation of personnel may be based upon hours worked, annual salary or annual salary plus sales incentives. Salaried employees (subject to certain eligibility requirements) are eligible to participate in an annual incentive bonus program.

21. Explain in detail how the applicant will adjust and pay claims.

A. Describe how you will train, supervise and compensate the personnel handling claims adjusting and claims payment.

The applicant’s process for training, supervising and compensating personnel handling claims adjustment and claims payment will not change as a result of its redomestication.

In general, the process for training, supervising and compensating personnel handling claims adjustment and claims payment involves the following for all states:

- All personnel that are processing claims in an operational capacity are hourly non-exempt employees that report to a unit manager or department manager. All employees are located in the U.S. and are trained and supervised by management personnel located in the U.S.
- Training of applicant's personnel is done through the applicant's human resources department, desk-level procedures and mentoring from managers within applicant's Retirement Division, Life Division and Benefits Division, as applicable.
- Training encompasses, among other topics, Security, Anti-Money Laundering, Privacy, Non-Discrimination and Conflict of Interest guidelines as well as internal processing rules and procedures based upon those guidelines.
- Compensation of Claims personnel may be based upon hours worked or annual salary. Salaried employees (subject to certain eligibility requirements) are eligible to participate in an annual incentive bonus program. Claims personnel compensation is not based on or related to claims experience or utilization.

B. Provide detailed information as to how and by whom claim reserves will be set and modified.

The following principles apply to the setting and modifying of claim reserves of the applicant and its insurance company affiliates:

- Claim reserves are computed in accordance with presently acceptable actuarial standards consistently applied and are fairly stated, in accordance with sound actuarial principles.
- Claim reserves are based on actuarial assumptions which produce reserves at least as great as those called for in any contract provision as to reserve basis and method, and are in accordance with other contract provisions.
- Claim reserves meet the requirements of the insurance laws and regulations of the state of domicile and are at least as great as the minimum aggregate amounts required by the state in which the statement is filed.
- Claim reserves are computed on the basis of assumptions consistent with those used in computing the corresponding items in the annual statement of each preceding year unless noted otherwise in the Actuarial Opinion.
- Claim reserves include provisions for all actuarial reserves and related statement items which ought to be established.

Claim reserves are set and modified by the actuarial expertise within the applicant and its affiliates and opined on by the appointed actuary.

C. Does applicant pay any representative given discretion as to the settlement or adjustment of claims whether in direct negotiation with the claimant or in supervision of the person negotiating, a compensation which is in any way contingent upon the amount of settlement of such claims?

Yes ___ No X

22. Is applicant a member of a group of companies that shares any of the following:

A. Common facilities with another company or companies

Yes X No ___

B. Services (e.g. accounting personnel for financial statement preparation)

Yes X No ___

C. Or, is a party to a tax allocation agreement in common with another company

Yes X No ___

If the answer to any of the above is Yes, explain the division of costs between participants. If costs are pro-rated, what is the basis for division? Attach a copy of relevant contracts and include a summary of any attached contract.

Cost-sharing Arrangements and Shared Services

- (1) The applicant is a party to a Services and Shared Expenses Agreement dated December 15, 2005, last amended February 22, 2012 whereby parties agree to provide and accept certain general services, including but not be limited to: (i) telecommunications and electronic data processing services, facilities and integration; (ii) marketing, public relations, advertising and sales promotion services; (iii) sales and distribution services; (iv) administration of agent and agency matters; (v) finance, accounting, data processing, tax, treasury, and auditing services; (vi) investment and related services; (vii) actuarial services; (viii) underwriting services; (ix) policy administration, claims, and customer support services; (x) purchasing and sourcing services; (xi) risk management and insurance procurement services; (xii) legal services; (xiii) human resources, personnel and payroll services; (xiv) general management and executive and miscellaneous consulting services; and (xv) recordkeeping.

Under the Agreement, the applicant's share of the common cost is determined in accordance with customary insurance accounting practices consistently applied, and based on internal cost distribution methodology including time and/or usage. The allocation method is reviewed on an annual basis and modified where necessary or appropriate to reflect fairly and equitably the actual incidence of costs for each party. Intercompany payable/receivable amounts will be settled within 30 days of the end of the month to which the payable/receivable applies. Each party may satisfy its payment obligation, in whole or in part, by offset of its right to receive a payment from a party.

A copy of the Services and Shared Expenses Agreement is attached hereto as Exhibit 6-22.1.

- (2) The applicant is party to an Administrative Services Agreement with its wholly-owned subsidiary, First Symetra National Life Insurance Company of New York, originally effective November 1, 1998 and restated January 1, 2005, pursuant to which the applicant performs certain administrative and special services for First Symetra National Life Insurance Company of New York, including accounting, data processing, underwriting, claims, advertising, actuarial legal and customer support, and provides the use of certain property, equipment and facilities.

A copy of the Administrative Services Agreement is attached hereto as Exhibit 6-22.2.

- (3) The applicant is party to an Intercompany Short-Term Lending Agreement with its wholly-owned subsidiary, First Symetra National Life Insurance Company of New York, dated August 6, 1992. Borrowings are limited in the aggregate to the lesser of \$5,000,000 or 4% of the applicant's admitted assets.

A copy of the Intercompany Short-Term Lending Agreement is attached hereto as Exhibit 6-22.3.

- (4) The applicant is party to an Intercompany Short-Term Borrowing Agreement with its wholly-owned subsidiary, Symetra National Life Insurance Company, and certain other affiliates within the insurance holding company system. The agreement was restated on August 2, 2004 and last amended May 22, 2009. Under this Agreement, no loan to or from the applicant or Symetra National Life Insurance Company may equal or exceed 3.0% of admitted assets.

A copy of the Intercompany Short-Term Borrowing Agreement is attached hereto as Exhibit 6-22.4.

- (5) The applicant and its affiliate, Symetra Investment Management, Inc., are parties to an Asset Allocation Models Service Agreement dated October 2, 2013, whereby Symetra Investment

Management, Inc. creates and delivers to the applicant asset allocation models and risk tolerance questionnaire.

A copy of the Asset Allocation Models Service Agreement is attached hereto as Exhibit 6-22.5.

- (6) The applicant and its affiliate Medical Risk Managers, Inc. ("MRM") are parties to an Underwriting/Administrative Management Agreement dated October 1, 2007, whereby the applicant appointed MRM as an underwriting and administrative manager, for and on behalf of the applicant, for certain of the medical stop loss insurance policies issued by the applicant to policyholders who self-insure their employee medical benefit welfare plans.

A copy of the Underwriting/Administrative Management Agreement is provided to the Division as Exhibit 6-22.6.

- (7) The applicant and its affiliate Symetra Securities, Inc. ("SSI") are parties to a Suitability Review Service Agreement dated March 21, 2013, whereby SSI, in accordance with the NAIC Suitability Model Regulation, provides and oversees a compliance system and a sufficient staff, as needed, to review, analyze and determine the suitability of sales of certain of applicant's products as mutually agreed upon by the parties in a manner consistent with current and future suitability requirements of the Financial Industry Regulatory Authority (FINRA), while this agreement remains in effect.

A copy of the Suitability Review Service Agreement is attached hereto as Exhibit 6-22.7.

- (8) The applicant, together with Symetra National Life Insurance Company and First Symetra National Life Insurance Company of New York, are parties to an Investment Management Agreement with White Mountains Advisors, LLC dated June 1, 2011 and subsequently amended retroactively to June 1, 2011, whereby White Mountains Advisors, LLC provides investment advisory services.

A copy of the Investment Management Agreement is attached hereto in response to Question 15 as Exhibit 6-15.6.

Tax Allocation Agreements

- (1) The applicant, together with Symetra National Life Insurance Company and First Symetra National Life Insurance Company of New York (collectively, the "Life Company Subgroup") are parties to an Agreement of Allocation of Payment of Federal Income Taxes restated August 2, 2004 (the "Life Company Subgroup Tax Agreement"). Allocation is based on separate return calculations, except that current credit for tax credits and net operating loss carryforwards are determined on the basis of the consolidated group. Intercompany tax balances are settled quarterly.

A copy of the Life Company Subgroup Tax Agreement is attached as Exhibit 6-22.8.

- (2) The applicant, as parent and payor on behalf of the Life Company Subgroup, is a party to an identical Agreement of Allocation of Payment of Federal Income Taxes between its non-life insurance company affiliates effective for tax years beginning January 1, 2010 and last amended March 5, 2013 (the "Non-Life Subgroup Tax Agreement"). The tax allocation agreements of each Subgroup support consolidated tax reporting for the entire group.

A copy of the Non-Life Subgroup Tax Agreement is attached as Exhibit 6-22.9.

23. Does applicant have any reinsurance contracts which contracts that in effect provide that applicant will reimburse or indemnify the Reinsurer for losses payable there under?

Yes ___ No X

If yes, provide the details in writing and attach to the Questionnaire.

24. Does any salaried employee or officer, exclusive of a director, presently have in force a license as an insurance broker issued by the _____ Iowa Department of Insurance?
(Name of Application State)
Yes No

If yes, please identify his/her license and position held with applicant.

Please refer to Exhibit 6-24 for a list of each salaried employee or officer that presently has in force a license as an insurance broker issued by the Iowa Division of Insurance, and that has been appointed by the applicant as an insurance producer in the state of Iowa.

25. Does applicant have outstanding unexercised stock options?
Yes No

A. If so, to whom and in what number of shares?

B. If options are outstanding for a number of shares greater than 10% of the number of shares presently issued and outstanding, a copy of the option form and of the plan pursuant to which they were granted are attached.

26. Are any of the applicant's policies being sold in connection with a mutual fund or investment in securities?
Yes No Not Applicable

If Yes, supply details including all sales literature which refers to the insurance and mutual fund or other investment literature that refers to the insurance and mutual fund or other investment plan connection.

The applicant offers securities through Symetra Securities, Inc. (SSI) in connection with two flexible premium deferred variable annuity products, Symetra True Variable Annuity and Symetra Spinnaker. Product brochures and fact sheets for Symetra True Variable Annuity and Symetra Spinnaker are attached as Exhibit 6-26.1 and 6-26.2, respectively. The prospectus and statement of additional information for each of these products are available at:

<http://www.symetra.com/IndividualsFamilies//Products/Annuities/Variable/Pages/Variable-Annuities.aspx>.

In addition, the applicant offers securities through SSI in connection with a Private Placement Flexible Premium Variable Adjustable Life Insurance policy ("Symetra VCOLI/VCOLI X"). Product Highlights for Symetra VCOLI/VCOLI X are attached as Exhibit 6-26.3.

27. If applicant is applying for authority to write Variable Annuities, provide the following:

- a) Copy(ies) of any third party management or service contracts
- b) Commission schedules
- c) Five-year sales and expense projections
- d) A statement from the insurer's actuary describing reserving procedures including the mortality and expense risks which the insurer will bear under the contract
- e) Statement of the investment policy of the separate account
- f) Copy of the variable annuity prospectus as filed with the SEC unless the separate account is not required to file a registration under the federal securities law
- g) Copies of the variable annuity laws and regulations of the state of domicile
- h) Copy(ies) of the variable annuity contract(s) and application(s)
- i) A description of any investment advisory services contemplated relating to Separate Accounts
- j) Board of Directors resolution authorizing the creation of the separate account

The applicant is currently licensed to write Variable Annuities in the state of Iowa.

28. If applicant is applying for authority to write Variable Life Insurance, provide the following:

- a) Copy(ies) of variable life policy(ies) the company intends to issue
- b) Name and experience of person(s) or firm(s) proposed to supply consulting, investments, administrative, custodial or distribution services to the company
- c) Disclose whether each investment advisor i) is registered under the Investment Advisers Act of 1940, or ii) is an investment manager under the Employee Retirement Income Security Act of 1974, or iii) whether the insurer will annually file required information and statements concerning each investment advisor as required by its domiciliary state
- d) Copy of the variable life prospectus as filed with the SEC unless the separate account is not required to file a registration under the federal securities law
- e) Statement of the investment policy of any separate account, and the procedures for changing such policy
- f) Copies of the variable life insurance laws and regulations of the state of domicile
- g) A statement from the insurer's actuary describing reserving procedures including the mortality and expense risks which the insurer will bear under the contract
- h) Standards of suitability or conduct regarding sales to policyholders
- i) Statement specifying the standards of conduct with respect to the purchase or sale of investments of separate accounts (i.e. Board resolution)
- j) Board of Directors resolution authorizing the creation of the separate account

The applicant is currently licensed to write Variable Life Insurance in the state of Iowa.

29. If applicant is applying for authority to write Life Insurance, has applicant at any time in any jurisdiction while operating under its present management, or at any time within the last five years irrespective of changes in management, taught or permitted its agents to sell insurance by using any of the following devices, or representations resembling any of the following:

- A "Centers of influence" and "advisory board,"
Yes ___ No ___
- B. A charter or founder's policy,
Yes ___ No ___
- C. A profit sharing plan,
Yes ___ No ___
- D. Only a limited number of a certain policies will be sold in any given geographical area;
Yes ___ No ___
- E. "Profits" will accrue or be derived from mortality savings, lapses and surrenders, investment earnings, savings in administration;
Yes ___ No ___
- F. A printed list of several large American or Canadian insurers showing the dollar amounts of "savings", "profits" or "earnings" they have made in such categories.
Yes ___ No ___

If the answer to any of the above is yes, supply a complete set of all sales material including the sales manual, all company instructional material, brochures, illustrations, diagrams, literature, "canned" sales talks, copies of the policies which are no longer in use, list of states where such methods were used and the date (by year) when they were used, the approximate amount of insurance originally written in each state on each policy form thusly sold, the amount currently in force, and the lapse ratio on each form year by year and cumulatively in gross to the present date.

The applicant is currently licensed to write Life Insurance in the state of Iowa.

30. Does the company pay, directly or indirectly, any commission to any officer, director, actuary, medical director or any other physician charged with the duty of examining risks or applications?
Yes ___ No X Not Applicable ___

If yes, provide the details in writing and attach to the Questionnaire.

The following questions are to be completed only if the company is redomesticating to another state.

31. Does the company have any permitted practices allowed by its current state of domicile?
Yes ___ No X Not Applicable ___

If yes, provide the details in writing and attach a copy of the state of domicile's approval to the Questionnaire.

32. Does the company's current state of domicile prescribe any practices of the company that are not in accordance with?
a. Laws, regulations or bulletins of proposed state of domicile;
Yes ___ No X Not Applicable ___

If yes, provide the details in writing and attach to the Questionnaire.

- b. Reserving requirements of proposed state of domicile; or
Yes ___ No X* Not Applicable ___

If yes, provide the details in writing and attach to the Questionnaire.

* Washington and Iowa prescribe the use of different mortality tables and discount rates for certain periods of time, as set forth in the Life & Health Valuation Law Manual. Any increase or decrease in the applicant's reserves arising from such differences would not be material.

- c. NAIC guidelines
Yes ___ No X Not Applicable ___

If yes, provide the details in writing and attach to the Questionnaire.

33. Will the company's investments comply with the investment laws, regulations or bulletins of the proposed state of domicile?
Yes X No ___ Not Applicable ___

If no, provide the details in writing and attach to the Questionnaire.

34. Does the company have any outstanding surplus notes?
Yes ___ No X Not Applicable ___

If yes, provide the details in writing and attach to the Questionnaire and attach copy(ies) of the surplus notes reflecting the state of domicile's approval.

Applicant Name: Symetra Life Insurance Company

NAIC No. 68608
FEIN: 91-0742147

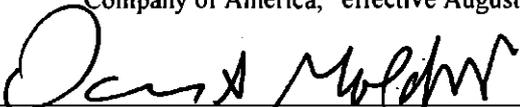
6/04

Exhibit 6-4

CERTIFICATION

The undersigned hereby certifies that the attached are true and correct copies of the following original instruments:

- Articles of Amendment to the Articles of Incorporation of Safeco Life Insurance Company, which reflect the name change of the Applicant from "Safeco Life Insurance Company" to "Symetra Life Insurance Company," effective September 1, 2004.
- Certificate of Amendment of Articles of Incorporation of the Lifeco Insurance Company of America, which reflect the name change of the Applicant from "Lifeco Insurance Company of America" to "Safeco Life Insurance Company," effective August 27, 1964.
- Certificate of Amendment of Articles of Incorporation of the General Life Company of America, which reflect the name change of the Applicant from "General Life Company of America" to "Lifeco Insurance Company of America," effective August 5, 1959.


(signature)

Date: January 10, 2014

Name: David S. Goldstein
Title: Senior Vice President, General
Counsel & Secretary, Symetra Life
Insurance Company

ARTICLES OF AMENDMENT
TO THE
ARTICLES OF INCORPORATION
OF
SAFECO LIFE INSURANCE COMPANY

Safeco Life Insurance Company, a Washington corporation, by its President and Secretary, certifies that:

1. The name of the corporation is: SAFECO LIFE INSURANCE COMPANY.
2. Article II of the corporation's Articles of Incorporation is amended in its entirety to read as follows:

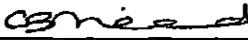
II

Effective September 1, 2004, the name of the company is Symetra Life Insurance Company.

3. The aforementioned amendment to the Articles of Incorporation was adopted by the corporation's Board of Directors and duly approved by the corporation's sole shareholder on June 4, 2004, in accordance with the provisions of RCW 23B.10.030, 23B.08.210, and 48.07.070.

SAFECO LIFE INSURANCE COMPANY

By: 
Randall H. Talbot
President

By: 
Christine B. Mead
Secretary

State of Washington }
 } ss
County of King }

The undersigned, being first duly sworn on oath, deposes and says:

That he is the President of Safeco Life Insurance Company, that he has read the Articles of Amendment set forth above, knows the contents thereof, and that the matters therein certified are in all respects true and correct.

Randall H. Talbot
Randall H. Talbot

Subscribed and sworn before me this 11th day of June, 2004.

Ann Ernst
Notary Public in and for the state
of Washington, residing at King County
My commission expires 02-14-05



State of Washington }
 } ss
County of King }

The undersigned, being first duly sworn on oath, deposes and says:

That she is the Secretary of Safeco Life Insurance Company, that she has read the Articles of Amendment set forth above, knows the contents thereof, and that the matters therein certified are in all respects true and correct.

Christine B. Mead
Christine B. Mead

Subscribed and sworn before me this 10th day of June, 2004.

Karen H. [Signature]
Notary Public in and for the state
of Washington, residing at Lynnwood, WA
My commission expires 6-27-2005

Filing No. 170382

DOMESTIC

AUG 28 8 49 AM '64

STATE OF WASHINGTON DEPARTMENT OF INSURANCE

United States of America

State of Washington



I, VICTOR A. MEYERS, Secretary of State of the State of Washington, do hereby certify that

AMENDED

ARTICLES OF INCORPORATION OF THE

LIFECO INSURANCE COMPANY OF AMERICA

(Changing name to SAFECO LIFE INSURANCE COMPANY)

a Domestic Corporation, of Seattle, Washington, was, on the 27th day of August, A. D. 1964, at 10:47 o'clock A. M., filed for record in this office and now remains on file herein.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed hereto the Seal of the State of Washington. Done at the Capitol, at Olympia, this 27th day of August, A. D. 1964.

Victor A. Meyers
VICTOR A. MEYERS, Secretary of State

By: Jean C. Dunker
Assistant Secretary of State.
(Mrs.) Jean C. Dunker



APPROVED IN THE OFFICE OF INSURANCE COMMISSIONER.

STATE OF WASHINGTON, this 27th day of August 1964

LEE I. KUECKELMAN
Insurance Commissioner

17 Fred Bunk
Chief Deputy Insurance Commissioner

FILED IN THE OFFICE
OF THE
INSURANCE COMMISSIONER
OF THE
STATE OF WASHINGTON

August 27, 1964
At _____ O'clock _____ M

LEE I. KUECKELMAN
Insurance Commissioner
By Fred Bunk



STOCKHOLDER'S ASSENT TO AMENDMENT OF
ARTICLES OF INCORPORATION OF
GENERAL LIFE COMPANY OF AMERICA

General Insurance Company of America, a Washington corporation, being the owner of all (100%) of the capital stock of General Life Company of America, a corporation organized and existing under the laws of the State of Washington pertaining to insurance corporations, does hereby give its written assent to the amendment of Article II of the Articles of Incorporation of said corporation to provide for a change of the name of said corporation to LIFEICO Insurance Company of America, said amendment having been made and adopted by the Board of Directors of said corporation at the meeting thereof held July 30, 1959.

In Witness Whereof, General Insurance Company of America has caused this assent to be executed by its duly authorized officers, and its corporate seal to be hereunto affixed, this 31st day of July, 1959.

GENERAL INSURANCE COMPANY OF AMERICA

By W. R. C. Paul
President

By adment
Secretary

APPROVED IN THE OFFICE OF INSURANCE COMMISSIONER.

STATE OF WASHINGTON, this 5th day of Aug 1959

WILLIAM A. SULLIVAN
Insurance Commissioner

By W. M. Sullivan
Chief Deputy Insurance Commissioner

FILED IN THE OFFICE
OF THE
INSURANCE COMMISSIONER

OF THE
STATE OF WASHINGTON

Aug. 5 - 1959

at _____ O'clock _____ M

WM. A. SULLIVAN
Insurance Commissioner

WAC

Frank H. Murkowski, Governor

Alaska

**Department of Community
and Economic Development**

Division of Insurance

P.O. Box 110805, Juneau, AK 99811-0805

Telephone: (907) 465-2515 • Fax: (907) 465-3422 • Text Telephone: (907) 465-5437

Email: Insurance@dced.state.ak.us • Website: www.dced.state.ak.us/insurance/

August 17, 2004

Ms. Judy Walter, Assistant Vice President
Safeco Life Insurance Company
5069 154th Place NE
Redmond WA 98052

Dear Ms. Walter:

Re: Amendment of Alaska Certificate of Authority

Enclosed is the amended certificate of authority number F-637 changing the name of the company, effective September 1, 2004. This document should be retained in your records until surrendered, withdrawn, or recalled by this division.

Also, as you have indicated that the name change is a result of a future change of control for Symetra Life Ins. Co., we would like to take this opportunity to remind you that the change of control must comply with AS 21.22.065.

Alaska statutes and other information can be downloaded/accessed from our web site: www.dced.state.ak.us/insurance.

Please contact me at (907) 465-4609 if I can be of further assistance to you.

Sincerely,



Carrie Cummings
Accounting Technician

Enclosure

State of Alaska
Department of Community & Economic Development
Division of Insurance

P.O. Box 110805, Juneau, AK 99811-0805
(907) 465-2515 Fax (907) 465-3422

No. F-637

CERTIFICATE OF AUTHORITY AMENDMENT

THIS IS TO CERTIFY that pursuant to the Insurance laws of the state of Alaska, Symetra Life Insurance Company organized under the laws of the state of Washington, was originally issued a certificate of authority effective September 3, 1963.

This amendment changes the name of the company from Safeco Life Insurance Company to Symetra Life Insurance Company effective September 1, 2004.

The company continues to be authorized to transact the following kinds of insurance:

LIFE (AS 21.12.040)
HEALTH (AS 21.12.050)
ANNUITY (AS 21.12.055)
VARIABLE LIFE (AS 21.42.370)
VARIABLE ANNUITY (AS 21.42.370)

Subject to all provisions of this certificate as such kinds are now or may hereafter be defined in the insurance laws of the state of Alaska.

THIS CERTIFICATE is expressly conditioned upon the holder hereof now and hereafter being in full compliance with all, and not in violation of any, of the applicable laws and lawful requirements made under authority of the laws of the state of Alaska as long as such laws of requirements are in effect and applicable, and as such laws and requirements now are, or may hereafter, be changed or amended.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the official state seal, at Juneau, Alaska
18th August 2004
this _____ day of _____

Kinda S. Hall

DIRECTOR



BOB RILEY
GOVERNOR

STATE OF ALABAMA
DEPARTMENT OF INSURANCE
201 MONROE STREET, SUITE 1700
POST OFFICE BOX 303351
MONTGOMERY, ALABAMA 36130-3351
TELEPHONE: (334) 269-3550
FACSIMILE: (334) 241-4192
INTERNET: www.aldoi.gov

September 29, 2004

WALTER A. BELL
COMMISSIONER
ASSISTANT COMMISSIONER
RAGAN INGRAM
DEPUTY COMMISSIONERS
D. DAVID PARSONS
JAMES R. (JOHNNY) JOHNSON
CHIEF EXAMINER
RICHARD L. FORD
STATE FIRE MARSHAL (ACTING)
RICHARD MONTGOMERY
GENERAL COUNSEL
MICHAEL A. BOWNES
RECEIVER
DENISE B. AZAR
LICENSING MANAGER
JIMMY W. GUNN

Judy Walter
Assistant Vice President
Safeco Life Insurance Company
P. O. Box 34690
Seattle, WA 98124-8900

**Re: Amendment of Certificates of Authority – Safeco Life Insurance Company
And Safeco National Life Insurance Company**

Dear Ms. Walter:

Enclosed you will find Amended Certificates of Authority reflecting the name changes of Safeco Life Insurance Company to Symetra Life Insurance Company and Safeco National Life Insurance Company to Symetra National Life Insurance Company, effective September 1, 2004.

If you have any questions, please call me at (334) 241-4154.

Sincerely,

Ann Strickland
Examiner

AS:dk

Enclosure

Certificate of Authority

State of Alabama Department of Insurance



I, the undersigned Commissioner of Insurance, for the State of Alabama, by the authority vested in me by law, do hereby authorize the company named below to act with the powers indicated hereon.

NAME SYMETRA LIFE INSURANCE COMPANY

ADDRESS 777 108th Ave NE Suite 1200 Bellevue WA 98004-5135

COMPANY ID: 68608

| <u>License Date</u> | <u>Power</u> | <u>Description</u> |
|---------------------|--------------|--------------------------------|
| May 24, 1957 | 1 | Life, Disability and Annuities |

THIS LICENSE REMAINS IN EFFECT UNTIL SUSPENDED, CANCELLED, EXPIRED OR REVOKED, AS LONG AS FEES AND TAXES ARE CURRENTLY PAID AND ALL LICENSING REQUIREMENTS ARE COMPLIED WITH

*IN WITNESS WHEREOF, I have
hereunto set my hand, and affixed the Official
Seal of this Department at the City of
Montgomery, Alabama.*

A handwritten signature in black ink, appearing to read "W. A. ...", written over a horizontal line.

Commissioner of Insurance



Arkansas Insurance Department

1200 West Third Street
Little Rock, AR 72201-1904
1-501-371-2600
1-800-282-9134
Fax 1-501-371-2618
www.state.ar.us/insurance

Divisions

Mike Huckabee
Governor

Mike Pickens
Commissioner

Administration
1-501-371-2620
1-501-371-2629 Fax
insurance.Administration@
mail.state.ar.us

Accounting
1-501-371-2605
insurance.Accounting@
mail.state.ar.us

Consumer Service
1-501-371-2640
1-800-852-5494
1-501-371-2749 Fax
insurance.Consumer@
mail.state.ar.us

Finance
1-501-371-2665
1-501-371-2747 Fax
insurance.Finance@
mail.state.ar.us

Human Resources
1-501-371-2815
insurance.HumanResources@
mail.state.ar.us

Information Systems
1-501-371-2657
insurance.InformationSystems@
mail.state.ar.us

Insurance Fraud Investigation
1-501-371-2790
1-501-371-2799 Fax
insurance.Fraud@
mail.state.ar.us

Legal
1-501-371-2820
1-501-371-2639 Fax
insurance.Legal@
mail.state.ar.us

License
1-501-371-2750
insurance.License@
mail.state.ar.us

Life & Health
1-501-371-2800
insurance.L&H@
mail.state.ar.us

Property & Casualty
1-501-371-2800
1-501-371-2748 Fax
insurance.P&C@
mail.state.ar.us

Risk Management
1-501-371-2690
insurance.RiskManagement@
mail.state.ar.us

Senior Health Insurance
Information Program
("SHIP")
1-501-371-2782
1-800-224-6330
1-501-371-2749 Fax
insurance.Seniors@
mail.state.ar.us

August 30, 2004

Judy Walter
Assistant Vice President
SAFECO LIFE and INVESTMENTS
5069 154th Place, N.E.
Redmond, WA 98052

RE: Certificate of Amendment to C/A No. 667 issued to
Safeco Life Insurance Company, NAIC #68608

Certificate of Amendment to C/A No. 1690 issued to
Safeco National Life Insurance Company, NAIC #90581

Dear Ms. Walter:

Enclosed are the above-captioned Certificates of Amendment, reflecting the companies' name changes from "Safeco Life Insurance Company" to "Symetra Life Insurance Company" and from "Safeco National Life Insurance Company" to "Symetra National Life Insurance Company", both effective September 1, 2004.

Please be advised this Department no longer amends the original Certificates of Authority. We issue Certificates of Amendment to the C/A's instead. Therefore, we are returning both companies' original Ark. C/A's. You may either attach the Amendments to the original C/A's or merely place them in the same file folder.

If you have any questions at all concerning this matter, please do not hesitate to contact me at (501) 371-2820 or terry.scott@mail.state.ar.us.

Sincerely,

Terry Scott

Terry Scott
Administrative Assistant/Legal

Enclosures

Comprehensive Health
Ins. Pool ("CHIP")
1-800-285-6477

Earthquake Insurance
Hot Line
1-800-852-5494

ARKids First
Healthcare Insurance
1-888-474-8275

No 667

Effective 12-17-90 Safeco Life Insurance Company moved its Home Office from Seattle to Redmond, Washington. msc/Legal

Certificate of Authority

STATE OF ARKANSAS
INSURANCE COMMISSIONER
LITTLE ROCK

THIS IS TO CERTIFY, That, pursuant to the Insurance Code of the State of Arkansas,

effective August 27, 1964,
has been changed to:

SAFECO LIFE INSURANCE COMPANY
~~LIFE CO INSURANCE COMPANY OF AMERICA~~

Fannie Hardy
Fannie Hardy, Executive
Assistant Commissioner

of REDMOND ~~SEATTLE~~, WASHINGTON, organized under the laws of WASHINGTON, having presented satisfactory evidence of compliance, this Certificate of Authority is hereby granted, authorizing the company to transact the following classes of insurance:

LIFE AND DISABILITY

Amended 8-15-89 to include Variable Contracts *PH*

subject to all provisions of this Certificate as such classes are now or may hereafter be defined in the Insurance Laws of the State of Arkansas.

THIS CERTIFICATE is expressly conditioned upon the holder hereof now and hereafter being in full compliance with all, and not in violation of any, of the applicable laws and lawful requirements made under authority of the laws of the State of Arkansas as long as such laws or requirements are in effect and applicable, and as such laws and requirements now are, or may hereafter be changed or amended.

IN WITNESS WHEREOF, effective as of the 1st day of May, 1960, I have hereunto set my hand and caused my official seal to be affixed this 22nd day of April, 1960.

all

THIS IS TO CERTIFY that, pursuant to the Insurance Code of the State of Arkansas, Certificate of Authority No. 667 is hereby amended as follows:

SAFECO LIFE INSURANCE COMPANY (NAIC #68608) changed its name to SYMETRA LIFE INSURANCE COMPANY.



Effective this 1st day of September, 2004.

A handwritten signature in black ink, appearing to read "Jimbe", is written over a horizontal line.

INSURANCE COMMISSIONER

DEPUTY COMMISSIONER

THIS IS TO CERTIFY that, pursuant to the Insurance Code of the State of Arkansas, Certificate of Authority No. 667 is hereby amended as follows:

SYMETRA LIFE INSURANCE COMPANY (NAIC #68608) moved its Home Office from Redmond to Bellevue, Washington, effective the 15th day of July, 2005.



IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of this Department at City of Little Rock, Arkansas, this 30th day of September, 2005.

Julio Benafield Bowman
INSURANCE COMMISSIONER

DEPUTY COMMISSIONER



**Department of Insurance
State of Arizona**
Financial Affairs Division - Analysis
Telephone: (602) 912-8420
Facsimile: (602) 912-8421

SEP 28 2004

JANET NAPOLITANO
Governor

2910 North 44th Street, Suite 210
Phoenix, Arizona 85018-7256
www.id.state.az.us

CHRISTINA URIAS
Director of Insurance

September 23, 2004

Judy Walter, Assistant Vice President
Safeco Life and Investments
5069 154th Place Northeast
Redmond, WA 98052

RE: Symetra Life Insurance Company (WA) (NAIC #68608) Amended Certificate of Authority

Dear Ms. Walter:

The Arizona Department of Insurance is pleased to enclose the Certificate of Authority for Symetra Life Insurance Company resulting from a name change.

Should you be in need of any additional assistance, please do not hesitate to contact this Department in writing or by utilizing the facsimile number listed in the letterhead above.

Sincerely,

Linda C. Hunt
Financial Surveillance Section Supervisor

LCH:rw

STATE OF ARIZONA



DEPARTMENT OF INSURANCE CERTIFICATE OF AUTHORITY

I, **CHRISTINA URIAS**, Director of Insurance of the State of Arizona, do hereby certify that

SYMETRA LIFE INSURANCE COMPANY
Domiciled in Washington
NAIC NO. 68608

has complied with the requirements of the Arizona Revised Statutes, Title 20 and is hereby authorized, subject to the provisions thereof and the Charter Powers of said Company, to transact the following kinds of insurance business:

**DISABILITY
LIFE
VARIABLE ANNUITIES
VARIABLE LIFE**

within the State of Arizona unless surrendered, suspended or revoked by the Director of Insurance.

In TESTIMONY WHEREOF, I have hereunto set my hand and affixed the official seal of the Director of Insurance at the City of Phoenix. The effective date of this certificate is September 1, 2004.

A handwritten signature in black ink, appearing to read "Christina Urias", is written over a horizontal line.

Christina Urias
Director of Insurance

E146 (1/03)

STATE OF CALIFORNIA
DEPARTMENT OF INSURANCE
SAN FRANCISCO

Nº 00 00

Amended
Certificate of Authority

THIS IS TO CERTIFY THAT, Pursuant to the Insurance Code of the State of California,

Symetra Life Insurance Company

of Washington, organized under the
laws of Washington, subject to its Articles of Incorporation or
other fundamental organizational documents, is hereby authorized to transact within the State, subject to
all provisions of this Certificate, the following classes of insurance:

Life and Disability

as such classes are now or may hereafter be defined in the Insurance Laws of the State of California.

THIS CERTIFICATE is expressly conditioned upon the holder hereof now and hereafter being in
full compliance with all, and not in violation of any, of the applicable laws and lawful requirements made
under authority of the laws of the State of California as long as such laws or requirements are in effect
and applicable, and as such laws and requirements now are, or may hereafter be changed or amended.

IN WITNESS WHEREOF, effective as of the 14th
day of November, 2005, I have hereunto
set my hand and caused my official seal to be affixed this
14th day of November, 2005.



John Garamendi
Insurance Commissioner

By

Patricia K. Staggs
for Richard D. Baum, Deputy
Chief Deputy

NOTICE:

Qualification with the Secretary of State must be accomplished as required by the California Corporations Code promptly after issuance of this Certificate of Authority. Failure to do so will be a violation of Insurance Code Section 701 and will be grounds for revoking this Certificate of Authority pursuant to the covenants made in the application therefor and the conditions contained herein.

STATE OF CALIFORNIA
DEPARTMENT OF INSURANCE
SAN FRANCISCO

№ 07952

Amended
Certificate of Authority

THIS IS TO CERTIFY THAT, Pursuant to the Insurance Code of the State of California,

Symetra Life Insurance Company

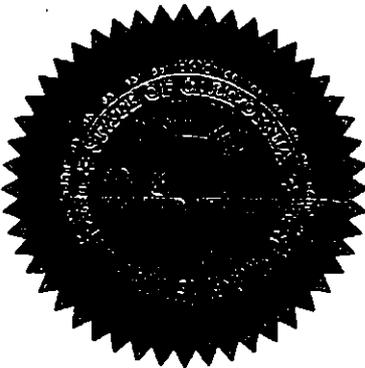
of Redmond, Washington, organized under the
laws of Washington, subject to its Articles of Incorporation or
other fundamental organizational documents, is hereby authorized to transact within the State, subject to
all provisions of this Certificate, the following classes of insurance:

Life and Disability

as such classes are now or may hereafter be defined in the Insurance Laws of the State of California.

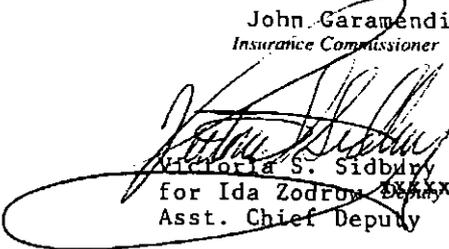
THIS CERTIFICATE is expressly conditioned upon the holder hereof now and hereafter being in
full compliance with all, and not in violation of any, of the applicable laws and lawful requirements made
under authority of the laws of the State of California as long as such laws or requirements are in effect
and applicable, and as such laws and requirements now are, or may hereafter be changed or amended.

IN WITNESS WHEREOF, effective as of the 19th
day of November, 2004, I have hereunto
set my hand and caused my official seal to be affixed this
19th day of November, 2004.



John Garamendi
Insurance Commissioner

By


Victoria S. Sidbury
for Ida Zedron, Deputy
Asst. Chief Deputy

NOTICE:

Qualification with the Secretary of State must be accomplished as required by the California Corporations Code promptly after issuance of this Certificate of Authority. Failure to do so will be a violation of Insurance Code Section 701 and will be grounds for revoking this Certificate of Authority pursuant to the covenants made in the application therefor and the conditions contained herein.

STATE OF COLORADO

DEPARTMENT OF REGULATORY AGENCIES



Bill Owens
Governor

DIVISION OF INSURANCE

Doug Dean
Commissioner of Insurance
1560 Broadway, Suite 850
Denver, CO 80202

July 26, 2004

Judy Walter
Safeco Life And Investments
5069 154th Place NE
Redmond, WA 98052

RE: Amended Colorado Certificate of Authority- Safeco Life Insurance Company.

Dear Ms. Walter:

Enclosed please find your Amended Colorado Certificate of Authority effecting the change of name to Symetra Life Insurance Company. The filing has been accepted and our records have been changed accordingly.

You will note that the Certificate is issued in continuous form, so please preserve it in the Company's permanent records.

If I may be of further assistance, please contact me directly at (303) 894-2151.

Sincerely,


Annie McClinton
Corporate Affairs

"The Mission of the Division of Insurance is Consumer Protection"

General Number: (303) 894-7499 / Consumer Complaints: (303) 894-7490 / Toll Free 1-800-930-3745 / FAX: (303) 894-7455
Producer Licensing/Promissor: 1-800-275-8247 / V/TDD For the Deaf of Hearing Impaired: (303) 894-7880
<http://www.dora.state.co.us/insurance>



Division of Insurance

DEPARTMENT OF REGULATORY AGENCIES
CERTIFICATE OF AUTHORITY

This is to Certify that the

Symetra Life Insurance Company,

organized under the laws of Washington,

subject to its Articles of Incorporation or other fundamental organizational documents and in consideration of its compliance with the laws of Colorado, is hereby licensed to transact business as a

Life

insurance company, for the lines of business designated below:

Accident and Health

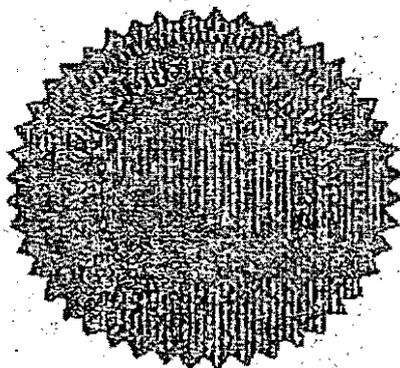
Annuities

Credit (Life, Accident & Health)

General Life

Variable Contracts

as provided by the Insurance Laws of Colorado, as amended, so long as the insurer continues to conform to the authority granted by its Certificate and its corporate articles, or its Certificate is otherwise revoked, cancelled or suspended.



In Witness Whereof, I have hereunto set my hand and caused the official seal of my office to be affixed at the City and County of Denver, this 22nd Day of July 2004


COMMISSIONER OF INSURANCE



STATE OF CONNECTICUT

INSURANCE DEPARTMENT

September 1, 2004

Ms. Judy Walter
Assistant Vice President
Safeco Life Insurance Company
5069 154th PL NE
Redmond, WA 98052

Re: Name Changes Effective September 1, 2004
Safeco Life Insurance Company (68608) to Symetra Life Insurance Company
Safeco National Life Insurance Company (90581) to Symetra National Life
Insurance Company

Dear Ms. Walter:

Please be advised that the above captioned name changes have been recorded in this state as of the effective date. Enclosed please find revised Certificates of Authority for both companies reflecting their new names.

Please forward a check in the amount of \$130.00 for this service (\$30.00 in filing fees and \$100.00 for the processing and recording of the change) per company made payable to, "Treasurer, State of Connecticut".

If I may be of any further service to you please feel free to contact me at anytime.

Very truly yours,

A handwritten signature in cursive script that reads "Paul Adamowich".

Paul Adamowich
Associate Examiner
Financial Analysis and Compliance Unit
860-297-3825
paul.adamowich@po.state.ct.us



STATE OF CONNECTICUT

INSURANCE DEPARTMENT

This is to Certify, that Symetra Life Insurance Company

having complied with the laws of the State of Connecticut, is licensed to transact in this state until the first day of May 2014, unless this license be sooner revoked, the lines of insurance numbered:

08 20 21 22 24

- | | |
|---|--|
| <i>1. Fire, Extended Coverage, and Other Allied Lines</i> | <i>16. Burglary and Theft</i> |
| <i>2. Homeowners Multiple Peril</i> | <i>17. Boiler and Machinery</i> |
| <i>3. Commercial Multiple Peril</i> | <i>18. Credit</i> |
| <i>4. Earthquake</i> | <i>19. Reinsurance</i> |
| <i>5. Growing Crops</i> | <i>20. Life Non-Participating</i> |
| <i>6. Ocean Marine</i> | <i>21. Life Participating</i> |
| <i>7. Inland Marine</i> | <i>22. Variable Life Non-Participating</i> |
| <i>8. Accident and Health</i> | <i>23. Variable Life Participating</i> |
| <i>9. Workman's Compensation</i> | <i>24. Variable Annuities</i> |
| <i>10. Liability other than Auto (B. I. and P.D.)</i> | <i>25. Title</i> |
| <i>11. Auto Liability (B. I. and P.D.)</i> | <i>26. Fraternal Benefit Society</i> |
| <i>12. Auto Physical Damage</i> | <i>27. Mortgage Guaranty</i> |
| <i>13. Aircraft (All Perils)</i> | <i>28. Health Care Center</i> |
| <i>14. Fidelity and Surety</i> | <i>29.</i> |
| <i>15. Glass</i> | <i>30.</i> |

Witness my hand and official seal, at Hartford,

this 1 day of May 2013



Insurance Commissioner

Certificate of Authority and Compliance

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS



C E R T I F I C A T E

THIS IS TO CERTIFY that all applicable provisions of the District of Columbia Business Corporation Act have been complied with and accordingly, this **CERTIFICATE OF AUTHORITY** is hereby issued to:

SYMETRA LIFE INSURANCE COMPANY

IN WITNESS WHEREOF I have hereunto set my hand and caused the seal of this office to be affixed as of the **15th** day of **February**, **2006**.

Patrick J. Canavan, Psy. D.
Director

Business and Professional Licensing Administration

A handwritten signature in black ink, appearing to read "Patricia E. Grays", written over a horizontal line.

Patricia E. Grays
Superintendent of Corporations
Corporations Division

Anthony A. Williams
Mayor

Government of the District of Columbia
DEPARTMENT OF INSURANCE, SECURITIES AND BANKING

CERTIFICATE OF AUTHORITY

License Number: 0068608

SYMETRA LIFE INSURANCE COMPANY

Government of the District of Columbia
DEPARTMENT OF INSURANCE, SECURITIES AND BANKING

Vincent C. Gray
Mayor

Issue Date: 04/24/2012

CERTIFICATE OF AUTHORITY

LICENSE NO: 0068608

The **SYMETRA LIFE INSURANCE COMPANY**, NAIC No. 68608, having complied with all the applicable requirements of law is hereby authorized to transact within the District of Columbia until April 30, 2013 the kind of insurance business designated below.

Group Accident and Health, Group Annuities (Fixed and Variable), Group Life, Individual Accident and Health, Individual Annuities (Fixed and Variable), Individual Life, Life and Health, and Variable Life

IN WITNESS HEREOF, I have hereunto set my hand.



William P. White, Commissioner

PLEASE CAREFULLY DETACH AT PERFORATION



DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
BUSINESS AND PROFESSIONAL LICENSING ADMINISTRATION
CORPORATIONS DIVISION

Government
Of the District of Columbia
P.O. Box 92300
WASHINGTON, D.C. 20090

APPLICATION FOR CERTIFICATE OF AUTHORITY
FOREIGN CORPORATION

To:
Department of Consumer and Regulatory Affairs
Business and Professional Licensing Administration
Corporations Division

Pursuant to the provisions of the Code of Laws for the District of Columbia and the BUSINESS CORPORATION ACT, the undersigned corporation hereby applies for a Certificate of Authority to transact business in the District of Columbia, and for that purpose submits the following statement:

1. Name of Corporation:

Symetra Life Insurance Company

2. Name elected to use in the District (Restate name by only choosing or adding "corporation", "incorporated", "company", or an abbreviation thereof, if same does not appear in corporate name as incorporated in its home state. Otherwise, answer same as 1.)

Same as #1

3. Incorporated under the laws of the State of:

Washington

4. Date of Incorporation:

April 15, 1957

5. Term of Existence (Perpetual or Specified Period):

Perpetual

6. Date commenced or will commence transacting business in the District:

June 19, 1957

7. Address (including street and number) of its principal office or registered office address in the

State/County where organized/incorporated:

777 108th Ave NE, Suite 1200 Bellevue, WA 98004

8. Address (including street and number) of its proposed registered office and name of its registered agent in the District at the same address (to receive service of process):

CT Corporation System 1015 15th Street NW Washington DC 20005

9. Briefly state/describe the business it proposes to transact in the District:

Life, Health, Annuities



FEB 15 2006
FILE COPY

10. Names and addresses (including streets and numbers) of its officers and directors:

President Name

Randall H. Talbot

Address

777 108th Ave NE, Suite 1200 Bellevue, WA 98004

Vice President Name

Roger F. Harbin

Address

777 108th Ave NE, Suite 1200 Bellevue, WA 98004

Secretary Name

George C. Pagos

Address

777 108th Ave NE, Suite 1200 Bellevue, WA 98004

Treasurer Name

Oscar C. Tengrio

Address

777 108th Ave NE, Suite 1200 Bellevue, WA 98004

Director Name

Allyn D. Close

Address

777 108th Ave NE, Suite 1200 Bellevue, WA 98004

Corporate Name

[Signature] Symetra Life Insurance Company

Signature of President or Vice President

Signature of Secretary or Assistant Secretary

(Corporate Seal)

File in duplicate originals - Filing Fee\$200.00

Attach written consent of registered agent

Attach an original certificate of good standing not over 30 days old

For General Information Call:

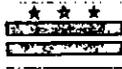
The Corporations Division - (202) 442-4432

Please check our corporate website to view organizations required to register, to search business names, to obtain step-by-step guidelines to register an organization, to search registered organizations, and to download forms and documents. Simply log onto our website at www.dkra.dc.gov, click on "Corporate Registrations" and procedure as prompted.

To ensure timely and accurate processing of this document, mail all required forms and payment to:



2006-02



DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
BUSINESS AND PROFESSIONAL LICENSING ADMINISTRATION
CORPORATIONS DIVISION

Government
Of the District of Columbia
DCRA
Corporations Division
P.O. Box 92300
WASHINGTON, D.C. 20090

WRITTEN CONSENT TO ACT AS REGISTERED AGENT

TO:
The Superintendent of Corporations
Department of Consumer and Regulatory Affairs
Business and Professional Licensing Administration,

(A) BY A DISTRICT OF COLUMBIA RESIDENT
PURSUANT TO D.C. CODE TITLE 29, and TITLE 41
I,

A Bona fide Resident of the District of Columbia Herein Consent to Act as a Registered Agent For:

Name of Business
SIGNATURE OF REGISTERED AGENT

DATE: _____
(B) BY A LEGALLY AUTHORIZED CORPORATION
THE CORPORATION HEREIN NAMED IS:
C T Corporation System

An Authorized Corporate Registered Agent in the District of Columbia, per Signatures of its President/Vice-President and Secretary/Assistant Secretary, Herein Consents to Act as Registered Agent

For:
Symetra Life Insurance Co

NAME OF COMPANY
SIGNATURE: Jack Caskey OF PRESIDENT OR VICE-PRESIDENT
ATTEST: Kathleen C. Ganepy OF SECRETARY OR ASSISTANT SECRETARY

DATE: 11/10/2006

For General Information Call:
The Corporations Division - (202) 442-4432

Please check our corporate website to view organizations required to register, to search business names, to obtain step-by-step guidelines to register an organization,

State of Delaware



DONNA LEE H. WILLIAMS
INSURANCE COMMISSIONER

841 SILVER LAKE BLVD.
DOVER, DELAWARE 19904-2465
(302) 739 - 4251
FACSIMILE (302) 739 - 5280

Department of Insurance

September 1, 2004

Ms. Judy Walter
Assistant Vice President
SAFECO Life and Investments
5069 154th Place NE
Redmond, VA 98052

Re: Change of Name from SAFECO Life Insurance
Company to Symetra Life Insurance Company

Dear Ms. Walter:

Attached please find Delaware Certificate of Authority No. 4380P which has been issued in the name of Symetra Life Insurance Company.

If I can be of further assistance, please do not hesitate to contact me at 302-739-4251, Ext. 160.

Sincerely,

A handwritten signature in black ink, appearing to read "Darryl Reese".

Darryl Reese
Director of Company Regulation

DR:djs
Attachment

No 4500 P

Annual Continuation Fee
\$100.00

State of Delaware



Department of Insurance

Certificate of Authority to Insurance Company

This Certifies that subject to and in accordance with the laws of this State,

The SYMETRA LIFE INSURANCE COMPANY
Symetra Financial Center, 777 108th Avenue NE, Suite 1200, Bellevue, WA
of Mailing: P.O. Box 34690, Seattle, WA 98124-1690 98004-5135

Incorporated or Organized on January 23, 1957 in Washington
as a Stock insurer is hereby authorized to transact the business of
Life, including annuities, Variable Annuities, Variable Life, Credit Life,
Health and Credit Health

insurance within the State of Delaware as such classes are now or may hereinafter be defined. This Certificate of Authority is the property of the State of Delaware and shall continue in force until terminated, suspended or revoked, subject to requirements for continuation by or on March 1 annually as set fort in the Insurance Laws of the State of Delaware. Admitted on June 17, 1957. New Certificate of Authority issued to reflect change in address.

IN WITNESS WHEREOF, I have
hereunto set my hand and official seal, at Dover,
this 19th day of October, 20 05



[Signature]
INSURANCE COMMISSIONER
[Signature]
DEPUTY INSURANCE COMMISSIONER



DEPARTMENT OF FINANCIAL SERVICES
OFFICE OF INSURANCE REGULATION

KEVIN M. MCCARTY
COMMISSIONER

FINANCIAL SERVICES
COMMISSION

JEB BUSH
GOVERNOR

TOM GALLAGHER
CHIEF FINANCIAL OFFICER

CHARLIE CRIST
ATTORNEY GENERAL

CHARLES BRONSON
COMMISSIONER OF
AGRICULTURE

August 27, 2004

VIA E-MAIL AND REGULAR MAIL

Ms. Judy Walter
Assistant Vice President
Safeco Life Insurance Company
5069 154th PL NE
Redmond, WA 98052

**Re: Safeco Life Insurance Company and Safeco National Life Insurance Company:
Amendment of Names to Symetra Life Insurance Company and Symetra National
Life Insurance Company**

Dear Ms. Walter:

Please be advised that the requested name change has been accepted by the Office of Insurance Regulation on August 26, 2004. Our records have been updated and now reflect the following:

**Symetra Life Insurance Company
FEIN #91-0742147**

and

**Symetra National Life Insurance Company
FEIN #91-1079693**

An additional copy of this letter and amended Certificates of Authority evidencing the new names will be mailed in the near future. For financial matters, this company is assigned to Beth Gallups. The examiner can be contacted at (850) 413-2452.

The insurers need to submit a name change endorsement forms for approval to the Bureau of Life and Health Forms and Rates. These endorsements will be mailed to each insured to notify them of the respective name changes.

Ms. Judy Walter
Assistant Vice President
August 27, 2004
Page 2 of 2

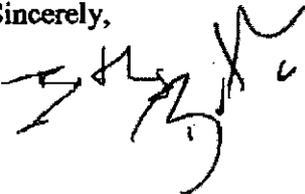
Pursuant to Section 627.410, Florida Statutes, as a result of these name changes, the insurers' policy forms will need to be modified to reflect the name changes and must be approved by the Office of Insurance Regulation before they can be used in Florida. There are two options available to accomplish this. The first option is for the insurers to submit all forms and rates for individual approval. The second option is for the insurers to enter into a consent order in which the Office approves all prior approved forms and rates under the new name. The insurers may continue to use the old policy forms, with the name change endorsement, for a period of (90) days after the date the Consent Order is executed by this Office or the refiled forms have been approved. When submitting the name change endorsement forms please state which of these options the companies will exercise in having their policy forms approved. If option two is chosen, you must provide along with the name change endorsement a list of forms you will modify with the name change.

Please note: Option two can only be used if the name change is the only modification being made to the form(s).

If you have any questions regarding the above, please call the Bureau of Life and Health Forms and Rates at 850-413-3152.

Should you have any questions of me, please feel free to contact me at (850) 413-2452 or via e-mail at gallupse@dfs.state.fl.us.

Sincerely,



//original signed
Elizabeth (Beth) Gallups
Life and Health Insurer Solvency

cc: FL DFS - Division of Rehabilitation & Liquidation
FL DFS - Legal Affairs, Service of Process
FL DFS - Bureau of Consumer Assistance
FL DFS - Agent/Agency Licensing
FL OIR - Bureau of Life & Health Market Conduct
FL OIR - Bureau of Life & Health Forms & Rates
FL OIR - Correspondence File
Paul Johns, Financial Examiner/Analyst Supervisor

SYMETRA LIFE INSURANCE COMPANY

Is hereby authorized to transact insurance in the
State of Florida.

This certificate signifies that the company has
satisfied all requirements of Florida Insurance
Code for the issuance of a Life And Health Insurer
Certificate Of Authority and remains subject to the
laws of Florida.

Date of Issuance: October 01, 1957

No. 04 - 910742147



Kevin M. McCarty
Director of Insurance Regulation



OFFICE OF INSURANCE AND SAFETY FIRE COMMISSIONER

JOHN W. OXENDINE
COMMISSIONER OF INSURANCE
SAFETY FIRE COMMISSIONER
INDUSTRIAL LOAN COMMISSIONER
COMPTROLLER GENERAL

September 7, 2004

SEVENTH FLOOR, WEST TOWER
FLOYD BUILDING
2 MARTIN LUTHER KING, JR., DRIVE
ATLANTA, GEORGIA 30334
(404) 656-2056 TDD# (404) 656-4031
www.gainsurance.org

Judy Walter
Assistant Vice President
Safeco Life Insurance Company
5069 154th Place, NE
Redmond, WA 98052

Re: Name Change of Safeco Life Insurance Company

Dear Ms. Walter:

Enclosed you will find an amended Georgia Certificate of Authority which reflects the name change of Safeco Life Insurance Company to Symetra Life Insurance Company.

If you have any questions, please feel free to contact me at (404) 657-9205.

Sincerely,

Kimberly Raper
Financial Analyst
Regulatory Services Division

Enclosure



**STATE OF GEORGIA
OFFICE OF INSURANCE AND SAFETY FIRE COMMISSIONER
CERTIFICATE OF AUTHORITY**

WHEREAS, THE SYMETRA LIFE INSURANCE COMPANY, ORGANIZED UNDER THE LAWS AND REGULATIONS OF THE STATE OF WASHINGTON, HAVING COMPLIED WITH THE REQUIREMENTS OF THE LAWS AND REGULATIONS OF THIS STATE AS ARE APPLICABLE TO SUCH ORGANIZATION, IT IS HEREBY LICENSED TO TRANSACT THE BUSINESS OF INSURANCE IN THE STATE OF GEORGIA ACCORDING TO THE LAWS THEREOF, WITH RESPECT TO THE FOLLOWING CLASSES AND/OR LINES OF INSURANCE:

LIFE, ACCIDENT, AND SICKNESS (INCLUDING VAR ANNUITY AND VAR LIFE)

NOTHING CONTAINED IN THIS LICENSE AUTHORIZES THE LICENSEE TO ENGAGE IN OR WRITE ANY CLASSES OR KINDS OF INSURANCE IN THIS STATE FOR WHICH THE LICENSEE IS NOT AUTHORIZED IN ITS STATE OF DOMICILE.

PURSUANT TO O.C.G.A. SECTION 33-3-16(a), THIS CERTIFICATE OF AUTHORITY EXPIRES AT 11:59 P.M. ON JUNE 30, 2014, UNLESS SUSPENDED OR REVOKED IN THE MANNER PROVIDED BY LAW.

GIVEN UNDER MY HAND AND SEAL OF OFFICE
THIS DAY, JUNE 24, 2013

RALPH T. HUDGENS
COMMISSIONER OF INSURANCE



LICENSE NUMBER: 2000550
NAIC NUMBER: 68608

LINDA LINGLE
GOVERNOR



MARK E. RECKTENWALD
DIRECTOR

JAMES R. AJONA, JR.
LT. GOVERNOR

J. P. SCHMIDT
INSURANCE COMMISSIONER

STATE OF HAWAII
INSURANCE DIVISION
DEPARTMENT OF COMMERCE & CONSUMER AFFAIRS
P. O. BOX 3614
HONOLULU, HAWAII 96811-3614

September 3, 2004

SYMETRA LIFE INSURANCE COMPANY
P O BOX 34690
SEATTLE WA 98124-1690 USA

RE: NAME CHANGE
SYMETRA LIFE INSURANCE COMPANY
NAIC Co. Code. 68608
Insurance Company Foreign/Alien - CN 100552
Domiciled in: SEATTLE, WA USA

Enclosed is the Certificate of Authority for SYMETRA LIFE INSURANCE COMPANY that has been amended to include your recent name change from SAFECO LIFE INSURANCE COMPANY, effective September 1, 2004.

By copy of this letter we are notifying your appointee(s), to amend their appointment forms to reflect this change.

Also, please forward to the Rate and Policy Analysis Branch, a copy of any endorsement letter to policyholders with a certificate of readability for such form, if required, pursuant to Hawaii Revised Statutes §431:10-107 and §431:10-102.

If you have any questions you may contact our office.

A handwritten signature in black ink, appearing to read "Theresa Sato".

Theresa Sato
Insurance Licensing Clerk

enclosure

cc: appointee(s)
HAWAII LIFE & DISABILITY INSURANCE GUARANTY ASSOCIATION

| | | |
|--|---------------|---------------------|
| For express mailing only: 335 Merchant Street - Room 213, Honolulu HI 96813 | | |
| Website: http://www.hawaii.gov/dcca/ins/ | FOR MORE INFO | phone: 808-586-2788 |
| E-mail: InsLic@dcca.hawaii.gov | | fax: 808-587-6714 |

State of Hawaii



INSURANCE DIVISION

This is to certify that SYMETRA LIFE INSURANCE COMPANY

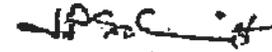
has been duly authorized as an INSURER

in the State of Hawaii on NOV 29, 1976

with authorized insurance class(es)

Accident and Health or Sickness
Life

Certificate Number 100552


Insurance Commissioner

This above-named insurer, having complied with the requirements of the law, is hereby authorized to transact, as an insurer, the above-named classes of insurance in the manner provided by law. This certificate of Authority is valid until terminated by surrender, revocation, or failure to extend. A new certificate will not be issued upon extension. This certificate shall remain in the possession of the insurer named herein until termination, at which time it must be delivered in the Commission's office.

State of Iowa

Certificate of Authority

This is to certify that the **Symetra Life Insurance Company** organized under the laws of **Washington** has complied with all the requirements of the law to be observed by such corporation, association or society, and that it is authorized to transact, within this state, until the 1st day of June next, subject, however to all the provisions and restrictions of the laws of the State of Iowa now or hereafter enacted, the kinds of insurance listed below which are specifically designated by the following numerals:

Company No
1131

10, 11, 12, 13, 14, 30



CODE AUTHORITY
608.509.611.515

- | | | |
|---|--------------------------------------|--|
| 1. Fire | 16. Liability other than auto (B.L.) | 30. Life, includes credit life, variable life, annuities, variable annuities and group |
| 2. Extended coverage | 17. Liability other than auto (P.D.) | 31. County mutual association |
| 3. Other allied lines | 18. Auto liability (B.L.) | 32. Fraternal benefit |
| 4. Homeowners multiple peril (inc. B.L.) | 19. Auto liability (P.D.) | 33. Reciprocal |
| 5. Commercial multiple peril | 20. Auto physical damage | 34. Mortgage guaranty |
| 6. Earthquake | 21. Aircraft physical damage | 35. Non-profit hospital and medical services |
| 7. Growing crops | 22. Fidelity | 36. Assessment association |
| 8. Ocean marine | 23. Surety | 37. Health maintenance organization |
| 9. Inland marine | 24. Glass | 38. Benevolent association |
| 10. Accident only (individual) | 25. Burglary and theft | 39. Financial guaranty |
| 11. Accident and health (individual) | 26. Boats and machinery | 40. |
| 12. Hospital and medical expense (individual) | 27. Livestock (only) | |
| 13. Group accident and health | 28. Credit (only) | |
| 14. Non-cancelable accident and health | 29. Reinsurance (only) | |
| 15. Workers' compensation | | |

In witness whereof I have hereunto set my hand and affixed the official seal at my office in the city of Des Moines.

This 1st day of June In the year 2013

Nick Decker
INSURANCE COMMISSIONER OF IOWA



State of Idaho
DEPARTMENT OF INSURANCE

DIRK KEMPTHORNE
Governor

700 West State Street, 3rd Floor
P.O. Box 83720
Boise, Idaho 83720-0043
Phone (208) 334-4250
FAX # (208) 334-4398

MARY L. HARTUNG
Director

September 3, 2004

Judy Walter
Assistant Vice President
Safeco Life Insurance Company
5069 154th Place NE
Redmond, WA 98052-9669

**RE: Return of Amended Certificate of Authority – Name Change
Symetra Life Insurance Company**

Dear Ms. Walter:

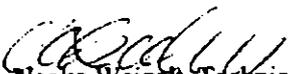
Enclosed please find Idaho Certificate of Authority No. 62 for Symetra Life Insurance Company. It has been amended to reflect the name change from Safeco Life Insurance Company, effective September 1, 2004.

Please review this Certificate carefully. If you feel that any of the information contained therein is erroneous, please contact the Department immediately.

This Certificate of Authority is continuous until further notice. Please make it a part of your company's permanent file.

If we can be of further assistance, please let us know.

Sincerely,


Naoko Weigelt, Technical Records Specialist
Examinations Section

Enclosure

cc: Pat Dillard, Premium Tax Specialist
Carol Anderson, Examinations Section
Donna Daniel, Senior Insurance Analyst
Gina McBride, Compliance Supervisor
Joan Krosch, Health Insurance Coordinator
Candie Kinch, Idaho Life & Health Insurance Guaranty Association

State of Idaho Department of Insurance

CERTIFICATE OF AUTHORITY

Number 62

THIS CERTIFIES, THAT

SYMETRA LIFE INSURANCE COMPANY,
a Stock Company domiciled in Washington

subject to the provisions of its Articles of Incorporation, and having presented satisfactory evidence of compliance with the requirements of the Laws regulating the insurance business in the State of Idaho, has been granted authority to transact such business, in this State, of the class or classes of insurance as indicated below.

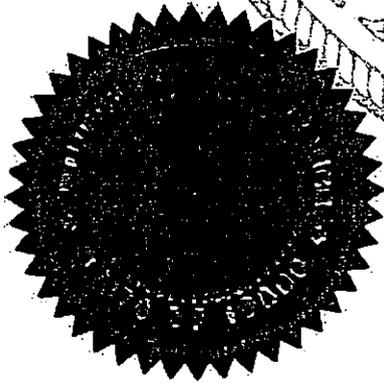
Disability, Excluding Managed Care
Life

Expiration Conditions: This Certificate of Authority is expressly conditioned upon the holder hereof remaining in full compliance with, and not in violation of, any of the applicable Laws and requirements of the State of Idaho. It shall at all times remain the property of the State of Idaho, and shall continue and remain in full force and effect from the date shown hereon, until expired, suspended, revoked or until otherwise terminated, subject to payment of the continuation fee and filing of a properly completed annual statement with the Director of Insurance on or before the first day of March of each year. Expiration, suspension, revocation or failure to pay the annual continuation fee or to timely file its properly compiled annual statement shall automatically terminate the insured's authority to conduct the business of insurance in the State of Idaho and this Certificate of Authority must forthwith be returned to the Department of Insurance of the State of Idaho.

IN WITNESS WHEREOF, I have hereunto set my hand and caused the Official Seal of the Department of Insurance to be affixed at Boise, Idaho, this 21st day of June 1957.


MARY L. HARTUNG
Director

Reissued Sep 01, 2004





Illinois Department of Financial and Professional Regulation
Division of Insurance

ROD R. BLAGOJEVICH
Governor

FERNANDO E. GRILLO
Secretary

DEIRDRE K. MANNA
Acting Director
Division of Insurance

September 1, 2004

Symetra Life Insurance Company
f/k/a Safeco Life Insurance Company
Attn: Judy Walter
Assistant Vice President
Post Office Box 34690
Seattle, Washington 98124-8900

Dear Ms. Walter:

Enclosed please find Amended Certificate of Authority in the name **Symetra Life Insurance Company**.

We are returning the Illinois Certificate of Authority as it needs to remain in your files for record purposes.

Very truly yours,

Marilyn S. Casteel
320 West Washington Street
Springfield, Illinois 62767
217782-3824
marilyn_casteel@ins.state.il.us

msc
Encl.

STATE OF ILLINOIS
DEPARTMENT OF INSURANCE



WHEREAS,

Symetra Life Insurance Company
located at
Bellevue, Washington

has complied with all the requirements of the "*Illinois Insurance Code*" applicable to said Company:

NOW, THEREFORE, I the undersigned, Director of Insurance of the State of Illinois, do hereby authorize the said Company to transact its appropriate business as set forth under clause(s)

(a),(b) of Class 1

of Section 4 of the "*Illinois Insurance Code*" in this State in accordance with the laws thereof, until the 1st day of July, 2014.



IN TESTIMONY WHEREOF, I hereto set my hand and cause to be affixed this Seal.

Done at the City of Springfield, this 1st day of July, 2013.

Andrew Boron
Andrew Boron
Director of Insurance

791900-21

Department of Insurance
State of Indiana
OFFICE OF
Insurance Commissioner

CERTIFICATE OF AUTHORITY

Indianapolis, Indiana, October 19, 2005

Whereas, The **Symetra Life Insurance Company of Bellevue, Washington** having complied with all the requirements of the laws regulating **Stock Life Insurance Companies** doing business in the State of Indiana.

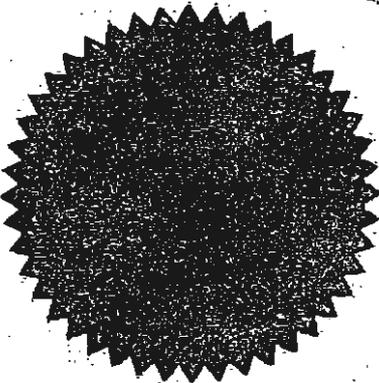
Therefore, as Insurance Commissioner of the State of Indiana, by virtue of authority vested in me by law, I do hereby authorize, empower and license the above named company to transact its appropriate business of:

Class I (a)(b)(c)

through its duly authorized agents in the State of Indiana, in accordance with the laws thereof which are applicable to said Company.

IN TESTIMONY WHEREOF I hereunto
subscribe my name and affix the seal of my
office the date written above.


INSURANCE COMMISSIONER



NAIC#68608

Department of Insurance
State of Indiana
OFFICE OF
Insurance Commissioner

CERTIFICATE OF AUTHORITY

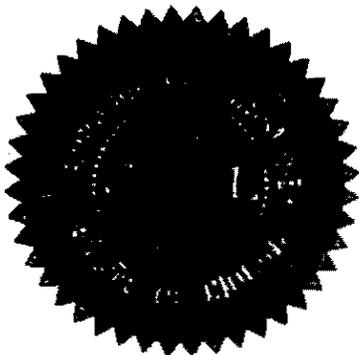
Indianapolis, Indiana **September 1, 2004**

*Whereas, The Symetra Life Insurance Company of Redmond, Washington having complied with all the requirements of the laws regulating **Stock Life** Insurance Companies doing business in the State of Indiana.*

Therefore, as Insurance Commissioner of the State of Indiana, by virtue of authority vested in me by law, I do hereby authorize, empower and license the above named company to transact its appropriate business of:

Class I (a) (b) (c)

through its duly authorized agents in the State of Indiana, in accordance with the laws thereof which are applicable to said Company.



*IN TESTIMONY WHEREOF I hereunto
subscribe my name and affix the seal of my
office the date written above.*

Amy E. Sorati

INSURANCE COMMISSIONER

REC'D AUG 30 2004



Kansas
Insurance
Department

Sandy Praeger COMMISSIONER OF INSURANCE

August 20, 2004

SYMETRA LIFE INSURANCE COMPANY
ATTN MS JUDY WALTER
5069 154TH PL NE
REDMOND WA 98052

Re: **Name Change of Safeco Life Insurance Company to Symetra Life Insurance Company**

Dear Ms. Walter:

Please find enclosed a revised Certificate of Authority authorizing **Symetra Life Insurance Company** to transact business in the state of Kansas.

Any technical details relating to your transacting business here will be forthcoming from members of my staff under separate cover.

Very truly yours,

Sandy Praeger
Commissioner of Insurance

SP/troy
Enclosure: Certificate of Authority

cc: LeRoy Brungardt



STATE OF KANSAS

INSURANCE DEPARTMENT

CERTIFICATE OF AUTHORITY

SYMETRA LIFE INSURANCE COMPANY

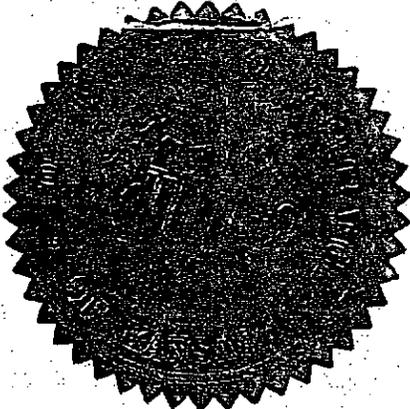
a corporation organized under the laws of Washington with a registered corporate office at Redmond, Washington has complied with all the requirements of the insurance laws of this state applicable to said company, and the said company is hereby authorized and empowered, through this Certificate of Authority, to transact the following lines of business, to wit:

* Life *

* Accident and Health *

within the State of Kansas from the 1st day of September, 2004 until such certificate is suspended, revoked or terminated by the Commissioner of Insurance of Kansas.

In Witness Whereof, I SANDY PRAEGER, Commissioner of Insurance of Kansas, have hereunto affixed my signature and the seal of the Commissioner of Insurance, in the city of Topeka, Kansas, this 20th day of August, 2004.



Sandy Praeger

Commissioner of Insurance

By _____
Assistant Commissioner

FIRE - CASUALTY - LIFE



ERNIE FLETCHER
GOVERNOR

ENVIRONMENTAL AND PUBLIC PROTECTION CABINET

OFFICE OF INSURANCE
P. O. Box 517
FRANKFORT, KENTUCKY 40602
(800) 595-6053
www.kentucky.gov

LAJUANA S. WILCHER
SECRETARY

September 1, 2004

Ms. Judy Walter
Symetra Life Insurance Company
P.O. Box 34690
Seattle, Washington 98124-1690

RE: Safeco Life Insurance Company name change to
Symetra Life Insurance Company

Dear Ms. Walter:

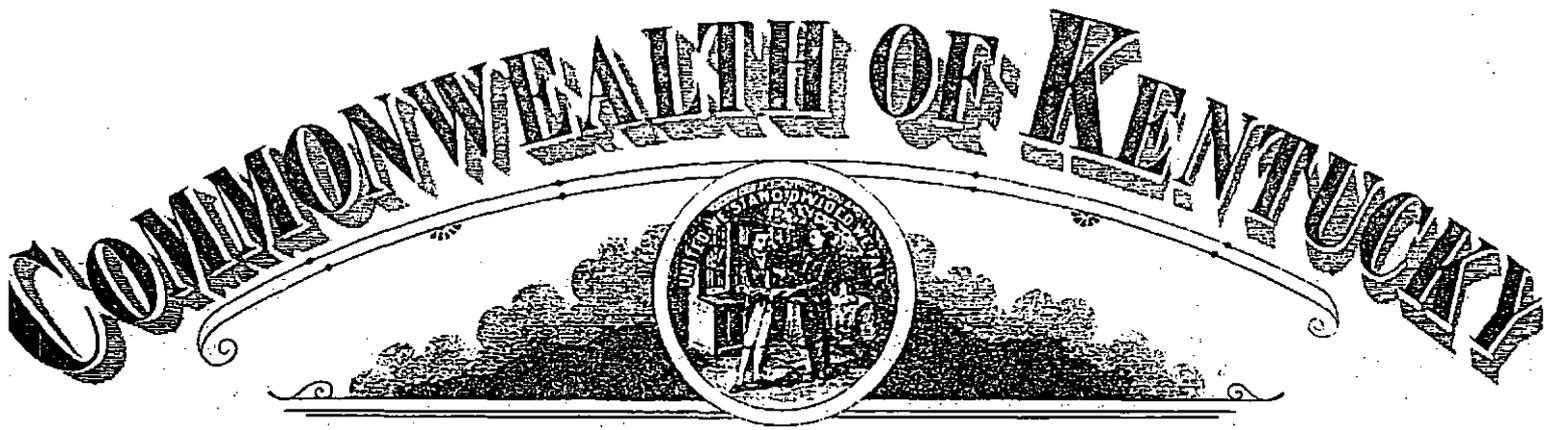
Enclosed is the amended Certificate of Authority for the above referenced company indicating the new name.

If you have questions, please feel free to contact me at 502/564-6082.

Sincerely,

A handwritten signature in cursive script that reads "Gina Goodrich".

Gina Goodrich
Administrative Secretary II
Financial Standards and Examination



Ernie Fletcher
GOVERNOR

OFFICE OF INSURANCE

CERTIFICATE OF AUTHORITY
Amended

Satisfactory evidence has been furnished to me showing that **Symetra Life Insurance Company** organized in the State of **Washington**, and having its principal office at **Bellevue, Washington**, is in sound and solvent condition, and has fully complied with all the provisions of the Insurance Laws of the Commonwealth of Kentucky that are applicable thereto. Now, therefore, on behalf of the Office of Insurance of the Commonwealth of Kentucky, I do hereby authorize the said insurance company to transact the business of **Life (includes annuities) and Health Insurance** in this Commonwealth for the period beginning on the date shown below and to continue in force as long as the insurer is entitled thereto.

R. Glenn Jennings

R. Glenn Jennings
Executive Director
Office of Insurance



This Certificate of Authority shall, at all times, be the property of the Commonwealth of Kentucky, and upon any expiration, suspension, revocation, or termination thereof, the insurer shall promptly deliver this Certificate to the Office of Insurance.

Certificate Number: 91-0742147

Date: September 27, 2005

Effective Date: July 15, 2005



LOUISIANA DEPARTMENT OF INSURANCE

P.O. Box 94214
BATON ROUGE, LOUISIANA 70804-9214
PHONE (225) 342-5900
FAX (225) 342-3078
<http://www.lidi.la.gov>

September 2, 2004

Ms. Judy Walter, Asst. VP
Symetra National Life Insurance Company
5069 154th Place NE
Redmond, VA 98052

RE: Symetra Life Insurance Company (NAIC 90581)
f/k/a Safeco Life Insurance Company
Name Change

Dear Ms. Walter:

Enclosed is the **Certificate of Authority and Recordation Certificate** that has been amended to reflect the change for the captioned action. Your canceled check will serve as your receipt for payment of filing fees.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Robert Wooley", with a long horizontal stroke extending to the right.

J. ROBERT WOOLEY
Commissioner of Insurance

/br

Enclosure

State of



Louisiana

James J. Donelon

COMMISSIONER OF INSURANCE

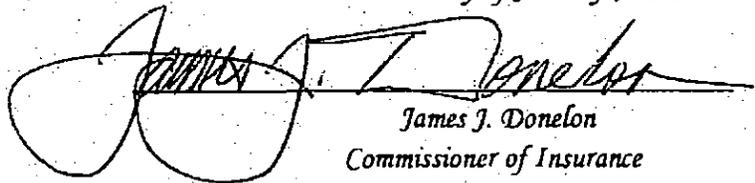
CERTIFICATE OF AUTHORITY

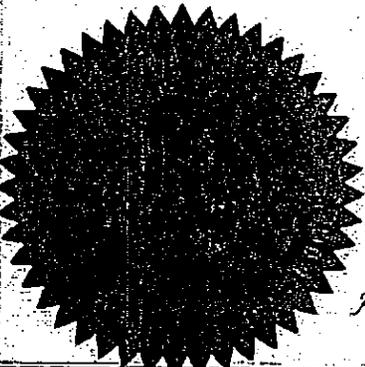
Whereas, the Symetra Life Insurance Company located at Washington has applied for a certificate of authority and made the filings required of such Insurer. Therefore, I, James J Donelon, the undersigned Commissioner of Insurance, do hereby certify that the said Symetra Life Insurance Company is authorized to transact its appropriate business of Annuities; Health and accident; Life Insurance in this State, in accordance with the laws thereof. This certificate shall remain in effect until cancelled, suspended, revoked or the renewal thereof refused.

In Testimony Whereof, I hereunto subscribe my name,

and affix the seal of my office at Baton Rouge this

1st day of January A.D 2010.


James J. Donelon
Commissioner of Insurance



Amended: Original certificate effective date May 12, 1959



J. ROBERT WOOLEY

COMMISSIONER OF INSURANCE

I, THE UNDERSIGNED COMMISSIONER OF INSURANCE OF THE STATE OF LOUISIANA, DO HEREBY CERTIFY THAT a certified copy of the Articles of Amendment of the Articles of Incorporation of Safeco Life Insurance Company in the state of Washington notarized by the Washington Office of Insurance Commissioner on the 7th day of July, 2004, as a true and correct copy from the records of his office, was filed in this office at 11:00 a.m. on the 1st day of September, 2004.

Name Change

Given Under my signature, authenticated with the impress of my Seal of office, at the City of Baton Rouge, this 1st day of September, A.D. 2004.

J. Robert Wooley
Commissioner of Insurance



COMMONWEALTH OF MASSACHUSETTS
Office of Consumer Affairs and Business Regulation
DIVISION OF INSURANCE

One South Station Boston, MA 02110-2208
(617) 521-7794 • FAX (617) 521-7771
TTY /TDD (617) 521-7490
<http://www.state.ma.us/doi>

MITT ROMNEY
GOVERNOR

KERRY HEALEY
LIEUTENANT GOVERNOR

BETH LINDSTROM
DIRECTOR, CONSUMER AFFAIRS
AND BUSINESS REGULATION

JULIANNE M. BOWLER
COMMISSIONER OF INSURANCE

September 2, 2004

Judy Walter
Assistant Vice President
Symetra Life Insurance Company
5069 154th Pl. NE
Redmond, WA 98052

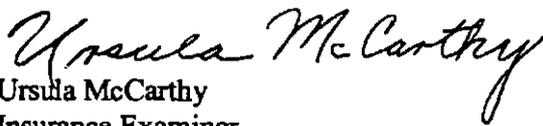
***Re: Name Change – Safeco Life Insurance Company, NAIC# 68608
to Symetra Life Insurance Company***

Dear Ms. Walter:

The Massachusetts Division of Insurance has received documentation regarding the name change of Safeco Life Insurance Company to Symetra Life Insurance Company.

Please be advised that the Division's company licensing records have been updated to reflect the name change. Enclosed you will find an amended Massachusetts Company License for Symetra Life Insurance Company, effective September 1, 2004.

Sincerely,


Ursula McCarthy
Insurance Examiner
Company Licensing Section

Enclosure



DEVAL L. PATRICK
GOVERNOR

COMMONWEALTH OF MASSACHUSETTS
Office of Consumer Affairs and Business Regulation
DIVISION OF INSURANCE

1000 Washington Street, Suite 810 • Boston, MA 02118-6200
(617) 521-7794 • Toll-free (877) 563-4467
<http://www.mass.gov/doi>

BARBARA ANTHONY
UNDERSECRETARY OF CONSUMER AFFAIRS
AND BUSINESS REGULATION

GREGORY BIALECKI
SECRETARY OF HOUSING AND
ECONOMIC DEVELOPMENT

JOSEPH G. MURPHY
COMMISSIONER OF INSURANCE

Serial #: 000839884000
NAIC #: 68608
Licensed: Jul 1 1960

COMPANY LICENSE

THIS IS TO CERTIFY THAT

Symetra Life Insurance Company

has fully complied with the requirements of the laws applicable to it and that it is authorized to issue policies and transact the kinds of business authorized under the Sections of Chapter 175 of the General Laws of Massachusetts and amendments thereto described by the following designations:

16A 16C 16E 6A 6B

DESIGNATION CODES:

| | | | |
|----|--|------|---|
| 1 | Fire | 15 | Reinsurance (Reinsurance Companies Only) |
| 2A | Ocean & Inland Marine | 16A | Life - All Kinds |
| 2B | Inland Marine Only | 16B | Group Life Only |
| 4 | Fidelity and Surety | 16C | Variable Annuity Authorization |
| 5A | Boiler | 16D | Annuities Only |
| 5B | Boiler (No Inspector) | 16E | Variable Life Authorization |
| 6A | Accident - All Kinds | 17 | Repair - Replacement |
| 6B | Health - All Kinds | 19 | Legal Services |
| 6C | Group Accident & Health | 20 | Credit Involuntary Unemployment |
| 6D | Non-Can. Acc. & Health | 51 | Stock Companies >(Extension of coverage) |
| 6E | Workers' Compensation | 64 | Mutual Companies >(not specified in Section 47) |
| 6F | Liability other than Auto | 54BX | Reinsurance except Life |
| 6G | Auto Liability | 64BY | Nuclear Energy |
| 7 | Glass | 54BZ | Special Hazards |
| 8 | Water Damage and Sprinkler Leakage | 64C | Comprehensive M.V. & Aircraft |
| 9 | Elevator Property Damage and Collision | 54D | Personal Property Floater |
| 10 | Credit | 64E | Dwellings |
| 11 | Title | 64F | Commercial Property |
| 12 | Burglary, Robbery, Theft | 54G | Reinsurance - Life Companies Only |
| 13 | Livestock | | |

This certificate shall remain in effect until midnight of Jun 30 2014 unless said authority is amended or revoked in accordance with law.

License Effective Date: Jul 1 2013

Joseph G. Murphy
Commissioner of Insurance

ROBERT L. EHRLICH, JR.
GOVERNOR

MICHAEL S. STEELE
LIEUTENANT GOVERNOR



ALFRED W. REDMER, JR.
COMMISSIONER

JAMES V. MCMAHAN, III
DEPUTY COMMISSIONER

LESTER C. SCHOTT
ASSOCIATE COMMISSIONER
EXAMINATION & AUDITING

STATE OF MARYLAND
MARYLAND INSURANCE ADMINISTRATION
525 St. Paul Place, Baltimore, Maryland 21202-2272
Writer's Direct Dial: 410-468-2152
Facsimile Number: 410-468-2112
e-mail: calford@mdinsurance.state.md.us

September 1, 2004

Mrs. Judy Walter, Asst. Vice President
Safeco Life Insurance Company
5069 154th PL NE
Redmond, WA 98052

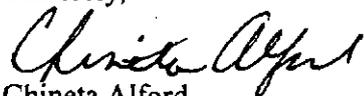
RE: Safeco Life Insurance Company – Name Change

Dear Mrs. Walter:

This will acknowledge receipt of your letter dated July 16, 2004, regarding changing the name of Safeco Life Insurance Company.

We have changed our records indicating that Safeco Life Insurance Company changed its name to Symetra Life Insurance Company, with an effective date of September 1, 2004.

Sincerely,


Chineta Alford
Director of Company Licensing

CA:gym
Enclosure

cc: Howard Max, Life & Health
Yvonne House, Agent Licensing



JOHN ELIAS BALDACCI
GOVERNOR

STATE OF MAINE
DEPARTMENT OF PROFESSIONAL
AND FINANCIAL REGULATION
BUREAU OF INSURANCE
34 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0034

ALESSANDRO A. IUPPA
SUPERINTENDENT

September 8, 2004

Judy Walter
Assistant VP
Safeco Life Insurance Company
5069 154th PL NE
Redmond, WA 98052

Re: Name Change of Safeco Life Insurance Company

Dear Ms. Walter:

The Maine Bureau of Insurance has approved the name change for Safeco Life Insurance Company to Symetra Life Insurance Company effective September 1, 2004; the new certificate of authority (license) is enclosed with this letter.

The next step for the company will be to submit its forms and rates to the appropriate division of the Bureau of Insurance. Please include with the forms submission a policyholder endorsement depicting the name change. Submit the forms to the attention of the appropriate supervisor listed below at the address in the letterhead.

- Carol Bondy**, Supervisor; Property and Casualty Division (207) 624-8422
- David Trubee**, Supervisor; Life & Disability Division (207) 624-8435
- Glenn Griswold**, Director, Health Care Division (207) 624-8494
- Frank Kimball**, Supervisor; Workers' Compensation Division (207) 624-8451

If you need further assistance please contact me by phone at (207) 624-8489, by Email at barbra.l.garboski@maine.gov or by mail at the address in our letterhead.

Sincerely,

Barbra Garboski
Assistant Insurance Analyst
Financial Analysis Division

enclosure



RECYCLED PAPER

OFFICES LOCATED AT: 124 NORTHERN AVE., GARDINER, MAINE 04345

PHONE: (207) 624-8475

TDD (207) 624-8563

CUSTOMER COMPLAINT 1-800-300-5000

FAX: (207) 624-8599

www.MaineInsuranceReg.org



STATE MAINE

of
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION
BUREAU OF INSURANCE

CERTIFICATE OF AUTHORITY

This is to certify that:

SYMETRA LIFE INSURANCE COMPANY

is authorized, Pursuant to Title 24-A MRS Chapter 5 to transact, the kinds of insurance listed below which are specifically designated by the following numerals:

01-LIFE
02-HEALTH

03-VARIABLE LIFE
04-VARIABLE ANNUITY

This License is perpetual until such time as the Authority is suspended, revoked, or otherwise modified or terminated by the Superintendent of Insurance to all provisions and restrictions of Law of the State of Maine now or hereafter enacted.

- 01. Life (Including Credit Life)
02. Health (Including Credit Health)
03. Variable Life
04. Variable Annuity
10. Fire
11. Allied Lines
12. Policyowners Multiple Peril
13. Homeowners Multiple Peril
14. Commercial Multiple Peril

- 15. Airplane Coverage
16. Ocean Marine
17. Inland Marine
18. Financial Guaranty
19. Medical Malpractice
20. Earthquake
21. Workmen Compensation
22. Other Liability
23. Products Liability

- 24. Auto Liability
25. Auto Physical Damage
26. Aircraft (All Perils)
27. Fidelity
28. Surety
29. Glass
30. Burglary and Theft
31. Boiler and Machinery
32. Cedula

- 33. Federal Flood Insurance
40. Tolls
45. Road Club

Issue Date: 9/1/2004
License: LHF777

NAIC #: 68608

Signature of Maine Superintendent of Insurance

Maine Superintendent of Insurance



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
OFFICE OF FINANCIAL AND INSURANCE SERVICES
DEPARTMENT OF LABOR & ECONOMIC GROWTH
DAVID C. HOLLISTER, DIRECTOR

LINDA A. WATTERS
COMMISSIONER

August 30, 2004

Ms. Judy Walter
Assistant Vice President
Safeco Life Insurance Company
5069 154th PL NE
Redmond, WA 98052

RE: Safeco Life Insurance Company NAIC No. 68608
Amended Certificate of Authority, MIBIIS No. 20836

Dear Ms. Walter:

The company's certificate of authority has been amended to reflect the name change of Safeco Life Insurance Company to Symetra Life Insurance Company. This is effective September 1, 2004. An amended certificate of authority is enclosed.

This will acknowledge receipt of the certificate of authority dated January 24, 1997. If you have any questions, please contact Sue Houseman at 877-999-6442.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara J. Strefling".

Barbara J. Strefling
Deputy Commissioner
Enterprise Monitoring & Insurance Examination Division

Enclosure

CERTIFICATE OF AUTHORITY

Office of Financial and Insurance Services

Effective Date: September 1, 2004

THIS IS TO CERTIFY, that

SYMETRA LIFE INSURANCE COMPANY
(Washington stock insurer)
NAIC No. 68608

is authorized in Michigan to transact the business of insurance, as defined in

- Chapter 06 - Section 602 - Life & Annuities
- Chapter 06 - Section 606 - Disability
- Chapter 09 - Section 925 - SubSection 1 - Separate Account - Variable Annuities
- Chapter 09 - Section 925 - SubSection 2 - Separate Account - Variable Life

of P.A. 218 of 1956 as amended, The Michigan Insurance Code, so long as the insurer continues to conform to the authority granted by this certificate, its corporate articles, the requirements of P.A. 218 of 1956 and all amendments to it and any limitations, conditions or other matters which have been agreed to from time to time between the insurer and the Commissioner.

This Certificate of Authority is granted subject to the laws of the state of Michigan and, as set forth in Sections 405 and 405a of the Michigan Insurance Code (MCL 500.405 and 500.405a), shall be:

AUTOMATICALLY REVOKED 90 DAYS AFTER A CHANGE OF CONTROL WHICH HAS NOT RECEIVED PRIOR APPROVAL OR 90 DAYS AFTER THE INSURER OR AN AFFILIATED INSURER IS MADE SUBJECT TO FORMAL DELINQUENCY PROCEEDINGS UNLESS THE INSURER REQUALIFIES FOR A CERTIFICATE OF AUTHORITY UNDER THE PROVISIONS OF THE MICHIGAN INSURANCE CODE.



Linda A. Watters, Commissioner



MINNESOTA
DEPARTMENT OF
COMMERCE

85 7th Place East, Suite 500
St. Paul, Minnesota 55101-2198
651.296.4026 FAX 651.297.1959 TTY 651.297.3067

September 2, 2004

Ms. Judy Walter, Asst. Vice President
Symetra Insurance Companies
5069 154th PL NE
Redmond, WA 98052

RE: Name Changes: Safeco Life to Symetra Life Ins. Co.
Safeco National Life to Symetra National Life Ins. Co.

Dear Ms. Walter:

We have received and completed your filings documenting the above name changes, both effective September 1, 2004.

We are unable to give you paper certificates for the current license year reflecting the name changes. We are currently in the process of converting from a paper certificate of authority to an electronic system whereby companies will be able to print their certificate themselves. This system will apply to the license year starting 6/1/04, however, it is not yet completed. We will contact companies when the new electronic system is completed. The certificates produced under the new system will show the correct names.

I am returning to your last years certificates, which did not require amending, for your files.

If you have any questions, please let me know.

Sincerely,

Susan M. Porter
Application Coordinator
Financial Examinations-Insurance
sue.porter@state.mn.us
(651) 296-6907 Phone
(651) 296-9434 Fax
Enc.

Market Assurance: 1.800.657.3602
Energy Information: 1.800.657.3710
www.commerce.state.mn.us

Licensing: 1.800.657.3978
Unclaimed Property: 1.800.925.5668
An Equal Opportunity Employer



***Certificate of Authority/Compliance
Minnesota Department of Commerce***

NAIC No.: 68608

Date Licensed in Minnesota: 06-17-1957

State/Country of Domicile: Washington

SYMETRA LIFE INSURANCE COMPANY

has complied with all the requirements and laws of the State of Minnesota and is hereby authorized to transact the business of an insurance company under M.S. 60A.06, Subd. 1, clauses

04-Life Including Variable Contracts
05A-Accident and Health

This certificate shall remain in effect until suspended, revoked, or otherwise legally terminated.

IN TESTIMONY WHEREOF, I have
hereunto set my hand at my office in the
City of St. Paul, Minnesota.

October 4, 2006

A handwritten signature in cursive script, appearing to read "Glenn Wilson".

Commissioner of Insurance

STATE OF MISSOURI

DEPARTMENT OF



INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

CERTIFICATE OF AUTHORITY

AS

Life and Health (Chapter 376, RSMo)

IT IS HEREBY CERTIFIED, THAT

SYMETRA LIFE INSURANCE COMPANY

A Washington Corporation

has complied with the requirements of the Insurance Laws of this State, and is hereby authorized subject to the provisions thereof and of the Charter powers of said company, to do the insurance or other business which are specifically designated by the following:

Accident and Health (376.010, RSMo)

Life, annuities and endowments (376.010, RSMo)

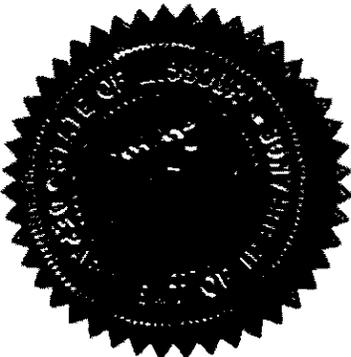
Variable Contracts (376.309, RSMo)

in the State of Missouri. This Certificate is a continuous authority and shall not be re-executed annually. This Certificate shall be extended each July 1st upon application for renewal by the company and upon payment of the statutory fees and taxes, and shall remain in full force and effect unless refused, suspended, or revoked by the Director.

IN WITNESS WHEREOF, I have hereunto caused my official seal to be affixed, this 24th day of September 2004.

Scott B. Lakin
Director

AMENDED





GEORGE DALE
Commissioner of Insurance
State Fire Marshal

LEE MARRELL
Deputy Commissioner

STATE OF MISSISSIPPI
Mississippi Insurance Department

501 N. West Street
1001 Woolfolk Building (39201)
Post Office Box 79
Jackson, Mississippi 39205-0079
(601) 359-3569
<http://www.doi.state.ms.us>

October 25, 2004

Ms. Kristie Morgan, Project Manager
Symetra Life Insurance Company
SAFECO Plaza
Seattle, WA 98185-0001

Dear Ms. Morgan:

In accordance with documentation received, the Company's records have been marked to show their change of name from SAFECO Life Insurance Company to Symetra Life Insurance Company effective September 1, 2004. The Company's amended Mississippi Privilege License and Certificate of Compliance are enclosed.

The Name Change Endorsement Form will be reviewed by the Department's Consulting Actuary this week.

If you find we can be of further service, please do not hesitate to so advise.

Sincerely,

GEORGE DALE
COMMISSIONER OF INSURANCE

BY Nancy Cross
Nancy Cross, CPTW
Statutory Compliance Officer

GD/NC/na
Encls: Subj.
cc: License Division
Financial Examinations



MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

MISSISSIPPI
CERTIFICATE OF AUTHORITY

I, THE UNDERSIGNED COMMISSIONER OF INSURANCE, OF THE STATE OF MISSISSIPPI, DO HEREBY CERTIFY THAT

SYMETRA LIFE INSURANCE COMPANY
777 108TH AVENUE NE, SUITE 1200
BELLEVUE, WA 98004-5135

License Number: 7700381

HAS COMPLIED WITH ALL THE REQUIREMENTS OF THE LAWS OF THIS STATE APPLICABLE TO SAID COMPANY
AND IS AUTHORIZED TO TRANSACT THE BUSINESS OF:

ACCIDENT & HEALTH
LIFE
VARIABLE CONTRACTS

IN ACCORDANCE WITH THE LAWS THEREOF UNTIL **12/31/2013**

MIKE CHANEY
COMMISSIONER OF INSURANCE



MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

MARK HAIRE
Deputy Commissioner of Insurance

**SYMETRA LIFE INSURANCE COMPANY
COMPLIANCE DEPARTMENT
P. O. BOX 34690
SEATTLE, WA 98124-1690**

**777 108TH AVENUE NE, SUITE 1200
BELLEVUE, WA 98004-5135
HOME OFFICE**

MISSISSIPPI

PRIVILEGE TAX LICENSE

SYMETRA LIFE INSURANCE COMPANY

License Number: 7700381

Type License: INSURANCE COMPANY

ISSUE DATE:

EXPIRATION DATE:

1/1/2013

12/31/2013

AUTHORIZED LINES:

ACCIDENT & HEALTH

LIFE

VARIABLE CONTRACTS

THIS LICENSE IS NOT TRANSFERABLE

**MIKE CHANEY
COMMISSIONER OF INSURANCE**

MONTANA STATE AUDITOR

JOHN MORRISON
STATE AUDITOR



COMMISSIONER OF INSURANCE
COMMISSIONER OF SECURITIES

September 7, 2004

Judy Walter, Assistant Vice President
Safeco Life Insurance Company
5069 154th PL NE
Redmond, WA 98052

Re: Name Change of Safeco Life Insurance Company to Symetra Life Insurance Company

Dear Ms. Walter:

Enclosed please find an amended Montana Certificate of Authority reflecting the above-captioned name change.

Accordingly, all of our records have been updated to reflect the change.

Be advised that, if not previously done, the Rates & Forms Bureau must be notified within 30 days of the procedure for contacting Montana policyholders of the name change.

If you have any questions, please feel free to contact me at (406) 444-2040.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Kain".

Richard A Kain
Insurance Examiner

Enclosure

cc: Rates & Forms Bureau



Office of the State Auditor
State of Montana
Department of Insurance

No. 4970

CERTIFICATE OF AUTHORITY

THIS IS TO CERTIFY that, pursuant to the Insurance Code of the State of Montana,

SYMETRA LIFE INSURANCE COMPANY

of Bellevue, Washington, organized under the laws of Washington, subject to its Articles of Incorporation or other fundamental organizational documents, is hereby authorized to transact within the State of Montana, subject to the provisions of this Certificate:

LIFE - DISABILITY

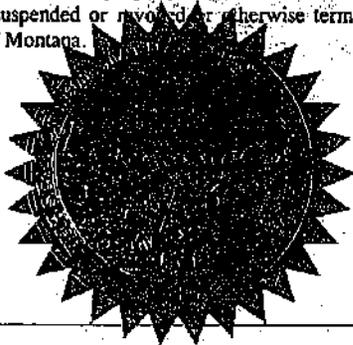
(Including Variable Authority for Life & Annuity Contracts, per 33-20-Part 6, MCA)

as now or may hereafter be defined in the Insurance Laws of the State of Montana.

This Certificate shall be effective on July 15, 2005.

This Certificate is expressly conditioned upon the holder hereof now and hereafter being in full compliance with all of the applicable laws and lawful requirements made under authority of the laws of the State of Montana as long as such laws or requirements are in effect and applicable, and as such laws and requirements now are, or may hereafter, be changed or amended.

This Certificate is at all times the property of the State of Montana and shall continue in force as long as the Company is entitled thereto under the laws of the State of Montana and until suspended or revoked or otherwise terminated, at which time the Company shall promptly deliver this Certificate to the Insurance Commissioner of the State of Montana.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my official seal, at the State Capital, City of Helena, this this 30th day of September, 2005.

John Morrison

John Morrison, State Auditor and Commissioner of Insurance

North Carolina Department of Insurance
Financial Analysis Division

1203 Mail Service Center, Raleigh, NC 27699-1203 (919) 424-6264 fax (919) 715-7490

September 1, 2004

Ms. Judy Walter
Assistant Vice President
Symetra Life Insurance Company
P. O. Box 34690
Seattle, WA 98124-1690

Re: Name Change of SAFECO Life Insurance Company to
Symetra Life Insurance Company effective as of September 1, 2004

Dear Ms. Walter:

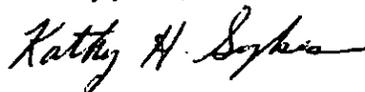
This will acknowledge receipt of your Company's recent letter as well as the stated enclosures regarding the above captioned name change. Attached is the amended license for SAFECO Life Insurance Company that is being issued to reflect its new corporate name of Symetra Life Insurance Company effective as of September 1, 2004.

Contact Mrs. Teresa Browning of this Office relative to the re-registration of the Company's securities with this Department at (919) 733-5633, ext. 248, if applicable.

Complete the attached "Complaint Contact Certification Form" and return it to Ms. Kin M. Thompson, Administrative Assistant, Consumer Services Division, (919) 715-0310, ext. 328, as soon as possible.

Should you have any questions regarding this matter, please contact me at (919) 424-6264.

Sincerely yours,



Kathy H. Sykes
Corporate Records Administrator
Financial Analysis Division

khs

cc: N. C. Life and Health Insurance Guaranty Association
All Appropriate Divisions of the N. C. Department of Insurance

AMENDED AS OF SEPTEMBER 1, 2004

STATE OF NORTH CAROLINA DEPARTMENT OF INSURANCE

LICENSE

NUMBER: 1893

Initial Effective Date: June 19, 1957

Symetra Life Insurance Company

an Insurance Company Domiciled in Washington

Symetra Life Insurance Company has complied with the necessary requirements pursuant to Chapter 58 of the North Carolina General Statutes to transact, subject to all provisions of the laws of this State, the following kinds of insurance as defined in N.C.G.S. 58-7-15:

01 02a 02b 02c 03a 03b

This license shall continue in force and in effect, subject to timely payment of the annual license continuation fee in accordance with N.C.G.S 58-6-7 and subject to any other applicable provision of the insurance laws of this state.



James E. Long
Commissioner of Insurance

**NORTH CAROLINA GENERAL STATUTE 68-7-16
DESIGNATION:**

LIFE INSURANCE

1. Life, including Individual Sick Benefit Insurance
2. Annuities
 - a. Annuities (excluding variable annuities)
 - b. Variable Annuities
 - c. Variable Life
3. Accident and Health, including Hospitalization
 - a. Cancelable
 - b. Non-Cancelable
 - c. Credit - Small Loans
 - d. Credit - Other than Small Loans

FIRE INSURANCE

4. Fire
5. Miscellaneous Property
 - a. Extended Coverage
 - b. Growing Crops
6. Water Damage (including sprinkler leakage)
 - a. Commercial
 - b. Residential
7. Burglary and Theft
8. Glass
11. Animal
12. Collision
 - *a. Automobile
 - b. Other
19. Motor Vehicle and Aircraft
 - *a. Property Damage
 - *b. Fire
 - *c. Theft
 - *d. Comprehensive
 - *e. Collision
20. Marine
 - a. Inland
 - b. Ocean
21. Marine Protection and Indemnity
22. Miscellaneous
 - c. Other

CASUALTY INSURANCE

3. Accident and Health, including Hospitalization
 - a. Cancelable
 - b. Non-Cancelable
 - c. Credit - Small Loans
 - d. Credit - Other than Small Loans
6. Water Damage (including sprinkler leakage)
 - a. Commercial
 - b. Residential
7. Burglary and Theft
8. Glass
9. Boiler and Machinery
10. Elevator
11. Animal
12. Collision
 - *a. Automobile
 - b. Other
13. Personal Injury Liability
 - *a. Automobile
 - b. Other
14. Property Damage Liability
 - *a. Automobile
 - b. Other
- * 15. Workmen's Compensation & Employer's Liability
16. Fidelity and Surety
17. Credit
18. Title
19. Motor Vehicle and Aircraft
 - *Property Damage
 - *a. Fire
 - *c. Theft
 - *d. Comprehensive
 - *e. Collision
21. Marine Protection and Indemnity
22. Miscellaneous
 - a. Aircraft Voluntary Settlement
 - b. Hold-in-Crisis
 - c. Other

*License for any line so indicated requires membership in the North Carolina Rate Bureau



**DEPARTMENT OF INSURANCE
STATE OF NORTH DAKOTA**

Jim Poolman
Commissioner of Insurance

September 3, 2004

Judy Walter
Safeco
5069 154th Pl NE
Redmond, WA 98052

**RE: Name Change of Safeco Life Insurance Company to
Symetra Life Insurance Company
NAIC Cocode #68608**

Dear Sir/Madam:

I have enclosed an amended Certificate of Authority reflecting the above captioned change. This has been made effective September 1, 2004. The new amended Certificate of Authority supersedes all others.

Thank you.

Sincerely,

Leona Ziegler
Leona Ziegler
Company Licensing
Enclosure

STATE OF NORTH DAKOTA
Department of Insurance



Certificate of Authority

This Is To Certify that pursuant to the Insurance Code of the State of North Dakota, Symetra Life Insurance Company, organized under the laws of Washington, subject to its Articles of Incorporation or other fundamental organizational documents is hereby authorized to transact within the State of North Dakota, subject to provisions of this certificate, the following lines of insurance:

**Life & Annuity
Accident & Health
Variable Life & Annuity**

As such lines are now or may hereafter be defined in Title 26.1, the Insurance laws of the State of North Dakota.

This certificate is expressly conditioned upon the holder hereof now and hereafter being in full compliance with all of the applicable laws and lawful requirements made under authority of the laws of the State of North Dakota as long as such laws or requirements are in effect and applicable, and as such laws and requirements now are, or may hereafter, be changed or amended.

This certificate is at all times the property of the State of North Dakota and shall continue in force as long as the Insurer is entitled thereto under the laws of the State of North Dakota and until suspended or revoked or otherwise terminated, at which time the Insurer shall promptly deliver this Certificate to the Insurance Commissioner of the State of North Dakota.

In Witness Whereof, I have hereunto set my hand at the City of Bismarck on September 1, 2004.

JIM POOLMAN

A handwritten signature in cursive script, appearing to read "Jim Poolman", written over a horizontal line.

COMMISSIONER OF INSURANCE

STATE OF NEBRASKA

DEPARTMENT OF INSURANCE
L. Tim Wagner
Director



Mike Johanns
Governor

September 1, 2004

Safeco Life and Investments
Ms. Judy Walter
Assistant Vice President
State Filing/Compliance F-3
P. O. Box 34690
Seattle, WA 98124-8900

RE: Safeco Life Insurance Company
Amended Certificate of Authority

Dear Ms. Walter:

Enclosed is the amended Certificate of Authority to transact insurance business in the State of Nebraska, changing the name from Safeco Life Insurance Company to Symetra Life Insurance Company effective September 1, 2004.

Please review this amended Certificate carefully to be certain it is correct. If you discover an error, please bring it to my attention. **Please note that Nebraska Identification Number 67100 will remain the same.**

We hope operations in Nebraska will be beneficial to your company and the insuring public.

Sincerely,

LYNN NANNEN
Staff Assistant

Enclosure

STATE OF NEBRASKA

DEPARTMENT OF INSURANCE

CERTIFICATE OF AUTHORITY

SYMETRA LIFE INSURANCE COMPANY

DOMICILED IN THE STATE OF WASHINGTON

IS HEREBY AUTHORIZED AND LICENSED TO TRANSACT THE BUSINESS OF INSURANCE IN THE STATE OF NEBRASKA AS DESCRIBED BY THE FOLLOWING SUB-SECTION(S) OF SECTION 44-201 OF THE STATUTES OF NEBRASKA:

01 Life Insurance
03 Variable Annuities
04 Sickness and Accident Insurance

149147
NEBRASKA IDENTIFICATION NUMBER

May 1, 2013
DATE ISSUED

April 30, 2014
DATE EXPIRES

SIGNED AT LINCOLN, NEBRASKA



Bruce R. Ramage
DIRECTOR OF INSURANCE



**THE STATE OF NEW HAMPSHIRE
INSURANCE DEPARTMENT**

21 SOUTH FRUIT STREET SUITE 14
CONCORD, NEW HAMPSHIRE 03301

SEP 28 2004

Roger A. Sevigny
Commissioner

Alexander K. Feldvebel
Deputy Commissioner

September 22, 2004

Judy Walter
Symetra Life Insurance Company
PO Box 34690
Seattle WA 98124-8900

RE: Amended Certificate of Authority

Dear Ms. Walter:

Enclosed please find Amended Certificate of Authority pursuant to the name change to Symetra Life Insurance Company (formerly known as Safeco Life Insurance company) effective September 1, 2004.

Upon receipt and review, if you have any questions, please give me a call.

Sincerely,

A handwritten signature in cursive script that reads "Diane T. Beaudoin".

Diane T. Beaudoin
Financial Assistant

Enc.

**THE STATE OF NEW HAMPSHIRE
INSURANCE DEPARTMENT**

License No: 100902

Presents that **SYMETRA LIFE INSURANCE COMPANY**
is hereby authorized to transact **Accident & Health , Life lines of Insurance**
in accordance with paragraphs **III , IV** of NH RSA 401:1.

Exclusions:



Effective Date: 06/15/2013

Expiration Date: 06/14/2014

A handwritten signature in black ink, appearing to read "R. Sevigny", is written over the printed name of the Commissioner of Insurance.

Roger A. Sevigny
Commissioner of Insurance

**THE STATE OF NEW HAMPSHIRE
INSURANCE DEPARTMENT**

License No: V 100902

Presents that **SYMETRA LIFE INSURANCE COMPANY**
is hereby authorized to transact **Variable Products** lines of Insurance
in accordance with State Statutes.

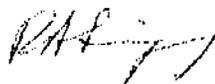
Exclusions: NA

**RSA 408:40 – The Commissioner does not recommend and assumes no responsibility
for variable contracts offered by the registrant.**



Effective Date: 06/15/2013

Expiration Date: 06/14/2014


Roger A. Sevigny
Commissioner of Insurance



State of New Jersey
DEPARTMENT OF BANKING AND INSURANCE
DIVISION OF INSURANCE
PO Box 325
TRENTON, NJ 08625-0325

JAMES E. MCGREEVEY
Governor

HOLLY C. BAKKE
Commissioner

August 27, 2004

Safeco Life and Investments
Judy Walter
5069 154th PL NE
Redmond, WA 98052

Re: Name Change

From: Safeco Life Insurance Company, Inc. (NAIC # 68608)

To : Symetra Life Insurance Company

Effective Date: September 1, 2004

Dear Sir/ Madam:

Receipt is acknowledged of your letter of July 16, 2004, and enclosures effectuating the above referenced name change. I have placed these items into the Department's file pertaining to the insurer. *I have also updated our database of company information to reflect the following change(s):*

- ***The referenced name change***

1. ***An amended New Jersey Certificate of Authority reflecting the name change is enclosed.***

Very truly yours,


Margaret P. Shaw
Insurance Examiner
(609) 292-5350 Extension: 50099

cc: Charter File



State of New Jersey
DEPARTMENT OF BANKING AND INSURANCE

CERTIFICATE OF AUTHORITY

DATE: APRIL 16, 2013

NAIC COMPANY CODE: 68608

THIS IS TO CERTIFY THAT THE **SYMETRA LIFE INSURANCE COMPANY OF BELLEVUE, WASHINGTON**, HAVING COMPLIED WITH THE LAWS OF THE STATE OF NEW JERSEY, AND ANY SUPPLEMENTS OR AMENDMENTS THERETO WITH RESPECT TO THE TRANSACTION OF THE BUSINESS OF INSURANCE, IS LICENSED TO TRANSACT IN THIS STATE UNTIL THE FIRST DAY OF **MAY, 2014**, THE LINES OF INSURANCE SPECIFICALLY DESIGNATED BELOW:

28 - LIFE

29 - HEALTH

30 - ANNUITIES

31 - VARIABLE CONTRACTS



KENNETH E. KOBYLowski

COMMISSIONER

State of New Mexico
Public Regulation Commission
Insurance Division

No. 956

Amended

2005

Certificate of Authority
Insurance Company

It is hereby certified, that the

Symetra Life Insurance Company
777 108th Avenue, N.E., Suite 1200
Bellevue, Washington 98004-5135
Organized under the laws of Washington

has complied with the requirements of the laws of this State applicable to said Company
and is hereby authorized to transact the business of

Life, Health and Variable Contracts

Insurance in accordance with its Charter or Certificate of Incorporation within the State
of New Mexico, subject to the provisions and requirements of law.

In Witness Whereof, The Superintendent of Insurance of the State
of New Mexico has caused this certificate to be signed and the seal
of said Superintendent to be affixed hereto at the city of Santa Fe,
this twenty-ninth day of December 2005.



A handwritten signature in cursive script, appearing to read 'Joe P. [unclear]', written in black ink.

Superintendent of Insurance

KENNY C. GUINN
Governor

STATE OF NEVADA

ALICE A. MOLASKY-ARMAN
Commissioner of Insurance

SYDNEY H. WICKLIFFE, C.P.A.
Director



DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE

788 Fairview Drive, Suite 300
Carson City, Nevada 89701-5491
(775) 687-4270 • Fax (775) 687-3937
Internet Address: doi.state.nv.us
E-mail: insinfo@doi.state.nv.us

September 13, 2004

Judy Walter, Assistant VP
Symetra Life Insurance Company
5069 154th PL NE
Redmond, WA 98052

**RE: # 580 - Symetra Life Insurance Company (prior # I 0660)
Name Change from: Safeco Life Insurance Company
Effective 09/01/2004**

Dear Ms. Walter:

Please find enclosed the amended Nevada Certificate of Authority. **The Certificate shall remain in-force until such time as suspended or revoked by the Commissioner of Insurance or voluntarily surrendered (NRS 680A.180).**

When the name of an insurer has changed on the Nevada Certificate of Authority, all agents appointed with that insurer will automatically roll over to the new name.

To ensure that all information is kept current with the Nevada Division of Insurance, please use Uniform Consent to Service of Process found at www.naic.org/ucaa (UCAAA Forms, "Corporate" form 12) and Change of Address form found at www.doi.state.nv.us. These forms should be filed *as changes occur*.

Sincerely,

A handwritten signature in cursive script that reads "Lin Riippi".

Lin Riippi, Administrative Assistant III
Corporate and Financial Affairs

Enclosure(s)

Amended
Certificate
of
Authority

STATE OF NEVADA
DEPARTMENT OF BUSINESS & INDUSTRY
DIVISION OF INSURANCE
Carson City, Nevada

Nevada ID #: 580 (prior number I 0660)

THE SYMETRA LIFE INSURANCE COMPANY

Incorporated in the State of WASHINGTON

Home office at Bellevue, WA

having duly qualified, is hereby licensed to transact:

**** LIFE AND HEALTH ****

*insurance business within the State of Nevada until terminated at the request of the insurer or suspended or
revoked by the Commissioner of Insurance.*



Dated at Carson City, Nevada this 1st
day of OCTOBER, 2005

Paul R. Holaday-Luman
Commissioner of Insurance



Bob Taft, Governor
Ann Womer Benjamin, Director

2100 Stella Court, Columbus, OH 43215-1067
(614) 644-2658 www.ohioinsurance.gov

September 17, 2004

Judy Walter
Assistant Vice President
Symetra National Life Insurance Company
5069 154th PL NE
Redmond WA 98052

Re: Name Change from Safeco National Life Insurance Company to Symetra National Life Insurance Company and Safeco Life Insurance Company to Symetra Life Insurance Company effective September 1, 2004.

Dear Ms. Walter:

We are in receipt of your letter dated July 16, 2004, informing us Safeco National Life Insurance Company has changed its name to Symetra National Life Insurance Company, and Safeco Life Insurance Company to Symetra Life Insurance Company effective September 1, 2004. Our records have been updated to reflect this name change. The amended Certificate of Authority is enclosed. The Department's Fiscal Division will send a bill to the company for \$10.00, which is the authorized fee for issuing these documents.

Please feel free to contact me at (614) 644-2648 or e-mail me at beth.chase@ins.state.oh.us if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Chase".

Elizabeth Chase
Executive Secretary
Office of Financial Regulation Services

Enclosure



Accredited by the National Association of Insurance Commissioners (NAIC)
Consumer Hotline: 1-800-686-1526 Fraud Hotline: 1-800-686-1527 OSHIP Hotline: 1-800-686-1578

Effective Date: October 29, 1957

Expiration Date: April 1, 2014

State of Ohio
Department of Insurance
Certificate of Authority

This is to Certify, that

SYMETRA LIFE INSURANCE COMPANY

NAIC No. 68608

is authorized in Ohio to transact the business of insurance as defined in the following section(s)
of the Ohio Revised Code:

Section 3911.01

Life, Health & Annuities

This Certificate of Authority is subject to the laws of the State of Ohio.



John R. Kasich, Governor

Mary Taylor

Mary Taylor, Lt. Governor/Director



CARROLL FISHER
Insurance Commissioner
State of Oklahoma

September 10, 2004

State Filing Compliance F-3
SAFECO Life Insurance Company
P.O. Box 34690
Seattle, WA 98124-8900

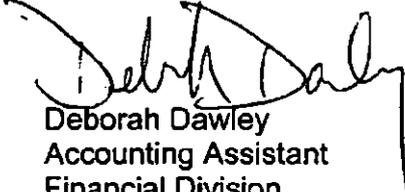
RE: Amended Certificate of Authority

Judy:

The Oklahoma Insurance Department received your request to change the name of SAFECO Life Insurance Company to Symetra Life Insurance Company. All the paper work has been completed and everything amended as of September 1, 2004.

If I can be of further assistance, please do not hesitate to contact me at 405-522-5358.

Sincerely,



Deborah Dawley
Accounting Assistant
Financial Division

Enclosure

State of



Oklahoma

Carroll Fisher
Insurance Commissioner
Oklahoma City, Oklahoma

Whereas, the SYMETRA LIFE INSURANCE COMPANY

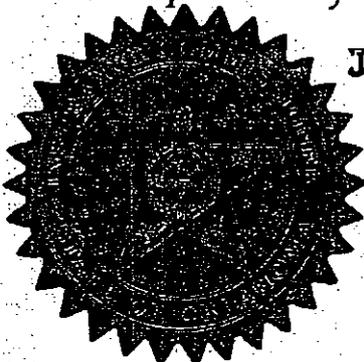
a corporation organized under the laws of WASHINGTON

and located at P.O. BOX 34690
SEATTLE, WA 98124-1690

having complied with the Insurance laws of Oklahoma, is hereby licensed and authorized to transact the business of

*** LIFE, ACCIDENT & HEALTH, VARIABLE ***

This Certificate of Authority shall be perpetual and automatically renewed as of March 1st of every year, unless the insurer fails to qualify for renewal pursuant to the requirements of Title 36 of the Oklahoma Insurance Code.



In Witness Whereof, I have hereunto set my hand and caused the seal of my office to be affixed at the City of Oklahoma City, State of Oklahoma, this

1ST day of SEPTEMBER A.D. 2004

Carroll Fisher

Carroll Fisher
Insurance Commissioner State of Oklahoma

Oklahoma License # 7240
AMENDED



Oregon

Theodore R. Kulongoski, Governor

Department of Consumer and Business Services

Insurance Division
350 Winter St. NE, Room 440
PO Box 14480
Salem, OR 97309-0405
(503) 947-7980
FAX (503) 378-4351
TTY (503) 947-7280
www.oregoninsurance.org

November 3, 2004

JUDY WALTER
ASST VICE PRESIDENT
SAFECO
PO BOX 34690
SEATTLE WA 98124-8900

Re: Amended Certificate of Authority
SAFECO LIFE INSURANCE COMPANY

Dear Ms. Walter:

Enclosed is an amended Certificate of Authority #1681 which reflects the name change of Safeco Life Insurance Company to Symetra Life Insurance Company, effective September 1, 2004.

Thank you for your cooperation during this process.

Sincerely,

Linda Rothenberger
Para-analyst
Financial Regulation Section
503/947-7227
linda.j.rothenberger@state.or.us

Enclosure

State of Oregon Insurer's Certificate of Authority

CERTIFICATE NO.
1681

DATE ISSUED
AUGUST 2, 1957 - ORIGINAL
APRIL 1, 1968 - REPLACEMENT
SEPTEMBER 1, 2004 - LAST AMENDED

INSURER SYMETRA LIFE INSURANCE COMPANY

DOMICILE WASHINGTON

**INSURANCE
AUTHORIZED** LIFE
HEALTH

This certifies that the named insurer has been granted authority this day to transact insurance in Oregon as stated above, in accordance with the Oregon Insurance Code.

This certificate shall continue in force as long as the insurer is entitled thereto under the Insurance Code or until suspended or revoked by the Department of Consumer and Business Services or terminated at the request of the insurer, subject however to continuance of the certificate by the insurer each year by fulfillment of Insurance Code requirements.



Joel Ario
Insurance Administrator
Insurance Division
Department of Consumer and Business Services

This certificate of authority is at all times the **PROPERTY OF THE STATE OF OREGON**. Upon any suspension, revocation or termination it shall be returned to the Department of Consumer and Business Services.



**COMMONWEALTH OF PENNSYLVANIA
INSURANCE DEPARTMENT**
OFFICE OF CORPORATE AND FINANCIAL REGULATION
1345 Strawberry Square
Harrisburg, PA 17120

Phone (717) 787-1879
Fax (717) 787-8557

September 1, 2004

Judy Walter
Assistant Vice President
Symetra Life Insurance Company
5069 154th PL NE
Redmond, WA 98052

**RE: Name Change from Safeco Life Insurance Company to
Symetra Life Insurance Company (NAIC #68608)**

Dear Ms. Walter:

Attached please find an amended Pennsylvania Certificate of Authority that reflects the referenced name change. The effective date for this change will be September 1, 2004.

Please feel free to contact me at (717) 787-1879 should you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Robert A. Kotal".

Robert A. Kotal
Insurance Company Licensing Specialist
Company Licensing Division

Enclosure



COMMONWEALTH OF PENNSYLVANIA
INSURANCE DEPARTMENT

CERTIFICATE OF AUTHORITY

Life

Effective Date: April 1, 2013

SYMETRA LIFE INSURANCE COMPANY

NAIC NO. 68608

HAS COMPLIED WITH THE REQUIREMENTS OF THE LAWS OF THE COMMONWEALTH OF PENNSYLVANIA RELATING TO ADMISSION IN SAID COMMONWEALTH FOR THE PURPOSE OF TRANSACTING INSURANCE BUSINESS IN PENNSYLVANIA AND THAT THE ABOVE NAMED COMPANY IS HEREBY AUTHORIZED TO TRANSACT THE BUSINESS OF:

Accident and Health 40 P.S. s 382(a)(2)

Life and Annuities 40 P.S. s 382(a)(1)

Separate Account (Variable Annuities) 31 PA Code Chap 85

Separate Account (Variable Life) 31 PA Code Chap 82

FOR THE YEAR ENDING MARCH 31, 2014, IN ACCORDANCE WITH ITS CHARTER AND IN CONFORMITY WITH THE LAWS OF SAID COMMONWEALTH OF PENNSYLVANIA.



IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND AND AFFIXED MY OFFICIAL SEAL, THE DATE AND YEAR FIRST ABOVE WRITTEN.

Michael Consedine

MICHAEL CONSEDINE
INSURANCE COMMISSIONER

REC'D AUG 19 2004



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Business Regulation
INSURANCE DIVISION
233 Richmond Street, Suite 233
Providence, RI 02903 - 4233
TELEPHONE NO. (401) 222-2223

FAX No. (401) 222-5475
TDD No. (401) 222-2999

July 21, 2004

Ms. Judy Walter, Assistant Vice President
Safeco Life Insurance Company
5069 154th Place NE
Redmond, WA 98052

RE: Name Change of Safeco Life
Insurance Company

Dear Ms. Walter:

Enclosed you will find the company's Replacement Certificate of Authority which has been revised, effective September 1, 2004, to reflect the change of the company's name to Symetra Life Insurance Company.

We have also enclosed our invoice for fees associated with the filing of documents required by that name change transaction. The company's check in payment of those fees should be made payable to the "General Treasurer, State of Rhode Island," and should be mailed directly to the Insurance Division at the above address. Please return one copy of the invoice with your payment.

With regard to the filing of previously approved policies and forms, enclosed you will find a copy of the policy and form filing requirements. You may submit the material to the Life, Accident & Health Section for review at this time.

Please feel free to contact me at (401) 222-5470 if I can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Walter D. Hope, Jr.".

Walter D. Hope, Jr., FLMI, CFE
Principal Insurance Examiner

Enclosures



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF BUSINESS REGULATION
INSURANCE DIVISION
233 RICHMOND STREET, SUITE 233, PROVIDENCE, R.I. 02903-4233

TO WHOM IT MAY CONCERN:

The undersigned **A. Michael Marques**
Insurance Commissioner of the State of Rhode Island, hereby certifies that

Symetra Life Insurance Company

of the City of **Bellevue** in the State of **Washington**
having complied with the requirements of the laws of this State relating to
insurance companies, has been duly admitted, and is fully authorized to transact,
through lawfully constituted and licensed resident agents, the business of life,
accident & health, annuities, and variable contracts.

insurance in said State of Rhode Island.

In Witness Whereof, I hereunto set my hand
and affix the official seal of this Department this 15th
day of **November** A.D. 2005.


Insurance Commissioner.

Issuance of this replacement Certificate of Compliance
effectively invalidates any Certificate of Compliance
previously issued by this Division.

This license shall be continuous, unless sooner
revoked or suspended, as provided by law.



**South Carolina
Department of Insurance**

**MARK SANFORD
Governor**

**Division of Financial Services
Office of Financial Analysis
300 Arbor Lake Drive, Suite 1200
Columbia, South Carolina 29223**

**Mailing Address:
P.O. Box 100105, Columbia, S.C. 29202-3105
Telephone: (803) 737-6221**

September 1, 2004

Judy Walter
Assistant Vice President
Safe Life and Investments
5069 154th PL NE
Redmond, Washington 98052

Re: Safeco Life Insurance Company
Name Change

Dear Ms. Walter:

Enclosed is the amended South Carolina Certificate of Authority for Symetra Life Insurance Company, which changed its name from Safeco Life Insurance Company effective September 1, 2004.

Should you have any questions regarding this matter, please to not hesitate to contact Mary Alice Floyd or me at (803) 737-6221.

Yours very truly,

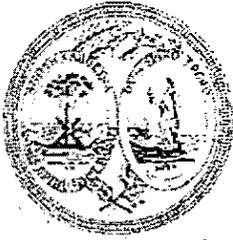
A handwritten signature in black ink that reads "Tim Campbell".

Tim Campbell
Chief Financial Analyst

Enclosure

(mafh:\slc.twc)

OCT 07 2005



**South Carolina
Department of Insurance**

MARK SANFORD
Governor

ELEANOR KITZMAN
Director of Insurance

Certificate of Authority

Company Code: 101462
Company Type: Stock (Life)
State of Domicile: WA

License Effective Date: 04/01/1958

**SYMETRA LIFE INSURANCE COMPANY
BELLEVUE, WA**

The Director of Insurance of this State does hereby certify that the above named insurance company has complied with the requirements of the insurance laws of this State, and is hereby authorized subject to the provisions thereof and of the charter powers of said company, to do business of the kinds of insurance listed below which are specifically designated:

- 19 - Life
- 20 - Variable Contracts
- 21 - Accident/Health

This Certificate shall remain in effect for an indefinite term unless said authority is amended or revoked in accordance with law or surrendered upon voluntary withdrawal from this State.

In testimony whereof, I hereto subscribe my name and affix the seal of my office at Columbia, South Carolina this 3rd day of October, 2005.

Handwritten signature of Eleanor Kitzman in cursive script.

Director of Insurance



445 East Capitol Avenue
Pierre, South Dakota 57501-3185
Phone: 605-773-3563
Fax: 605-773-5369

September 2, 2004

Judy Walter
Symetra Life Insurance Company
5069 154th Place, NE
Redmond, Washington 98052

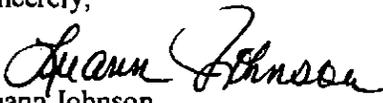
Re: Company name change
Symetra Life Insurance Company - NAIC #68608
Formerly: Safeco Life Insurance Company

Dear Ms. Walter:

The above noted name change has been approved in South Dakota effective September 1, 2004. Enclosed is a new Certificate of Authority issued in the name of Symetra Life Insurance Company. The NAIC company number remains the same, #68608. Any agent appointments that were active under the former name will automatically roll over to the records of the new company name.

Should you have any questions or concerns pertaining to this name change, please let me know.

Sincerely,


Luann Johnson
SD Division of Insurance



South Dakota Department of Revenue and & Regulation
Division of Insurance
445 East Capitol
Pierre, South Dakota 57501
605-773-3563

COMPANY CERTIFICATE OF AUTHORITY

The South Dakota Director of Insurance hereby issues the following company a Certificate of Authority to do business in the State of South Dakota for the lines so indicated. This is a perpetual license and will remain active unless otherwise cancelled, suspended or revoked.

SYMETRA LIFE INSURANCE COMPANY
777 108TH AVENUE, NE #1200
BELLEVUE, WASHINGTON 98004

NAIC #68608 DOMICILE: WASHINGTON

Authorized lines: 1, 2, 20, 21.

- | | |
|------------------------------|-----------------------------|
| 1- Life | 15- Aircraft |
| 2- Health | 16- Credit |
| 3- Fire & Allied Lines | 17- Crop Hail |
| 4- Inland & Ocean Marine | 18- Livestock |
| 5- Workers Compensation | 19- Title |
| 6- Bodily Injury (No Auto) | 20- Variable Annuity |
| 7- Property Damage (No Auto) | 21- Variable Life |
| 8- Bodily Injury (Auto) | 22- Reinsurance |
| 9- Property Damage (Auto) | 23A- Travel Accident |
| 10- Physical Damage (Auto) | 23B- Pre-Paid Legal |
| 11- Fidelity & Surety Bonds | 23C- Bail Bonds |
| 12- Glass | 24- SD Farm Mutual (County) |
| 13- Burglary & Theft | 25- SD Farm Mutual (State) |
| 14- Boiler & Machinery | |

Merle Scheiber - Director

October 1, 2005



**STATE OF TENNESSEE
DEPARTMENT OF COMMERCE AND INSURANCE
Insurance Division - Statistical Section
500 James Robertson Parkway, 4th Floor
Nashville, TN 37243
(615) 741-2637**

September 1, 2004

Judy Walter
Assistant Vice President
Safeco National Life Insurance Company
5069 154th PL NE
Redmond, WA 98052

Dear Ms. Walter:

The enclosed Certificate of Authority has been amended to change the name of the company from Safeco Life Insurance Company to SYMETRA LIFE INSURANCE COMPANY, effective September 1, 2004, in the State of Tennessee.

Attached is our invoice in the amount of \$90.00.

Should you have any questions, please contact Martha Gotto at the phone number listed above.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry C. Knight, Jr.", written over a horizontal line.

Larry C. Knight, Jr.
Assistant Commissioner for Insurance

lck:mg

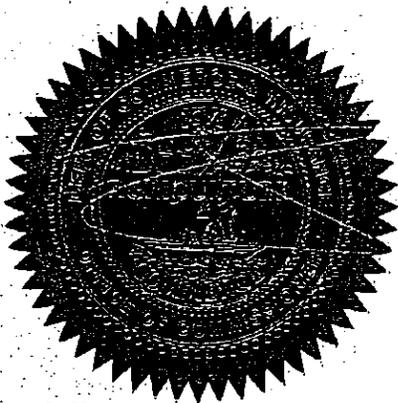
Enclosure

State of Tennessee



THE DEPARTMENT OF COMMERCE AND INSURANCE DIVISION OF INSURANCE

Whereas, the Symetra Life Insurance Company (NAIC #68608) a corporation organized under the laws of the State of Washington and located at Bellevue, Washington, having complied with such of the requirements of the Insurance laws of Tennessee as are applicable to the said corporation in order to enable it to transact business herein; therefore, I, Commissioner of Commerce and Insurance, do hereby license and authorize the said Symetra Life Insurance Company subject to all the requirements and conditions of the laws to transact the business of Life, Accident and Health, and Variable Contracts Insurance in the State of Tennessee, from January 31, 2006, until suspended or revoked.



In witness whereof, I have hereunto set my hand and caused the seal of my office to be affixed, at City of Nashville, in the State of Tennessee, this 31st day of January, A.D. 2006.

Paula A. Howers

Commissioner of Commerce and Insurance

No. **04-0838**

OFFICIAL ORDER
of the
COMMISSIONER OF INSURANCE
of the
STATE OF TEXAS
AUSTIN, TEXAS

Date: **SEP 01 2004**

Subject Considered:

SAFECO LIFE INSURANCE COMPANY
Redmond, Washington
TDI No. 02-71970

APPLICATION FOR AMENDED CERTIFICATE OF AUTHORITY

General remarks and official action taken:

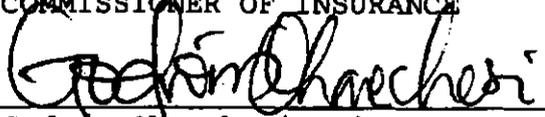
On this day came on for consideration by the Commissioner of Insurance, the application of SAFECO LIFE INSURANCE COMPANY, Redmond, Washington, for an amended Certificate of Authority changing its name from SAFECO LIFE INSURANCE COMPANY to SYMETRA LIFE INSURANCE COMPANY.

Documentation has been submitted from the Office of Insurance Commissioner of the State of Washington, approving the Articles of Amendment to the Articles of Incorporation of SAFECO LIFE INSURANCE COMPANY changing its name to SYMETRA LIFE INSURANCE COMPANY. The company has complied with TEX. INS. CODE ANN. §982.051, for an amended Certificate of Authority. The Name Change Endorsement for SYMETRA LIFE INSURANCE COMPANY, Redmond, Washington, Form No. LA-4035/TX 9/04 has been filed with the Life/Health Division of the Texas Department of Insurance.

THEREFORE, based upon the representations made by the Company, the Commissioner of Insurance ORDERS that an amended Certificate of Authority be issued to SYMETRA LIFE INSURANCE COMPANY, Redmond, Washington in accordance with this application and that thereupon the prior Certificate of Authority No. 9467, dated December 21, 1990, be canceled.

JOSE MONTEMAYOR
COMMISSIONER OF INSURANCE

BY:


Godwin Ohaechesi, Director
Company Licensing & Registration
Order 01-0692

Recommended by:


Loretta Calderon, Insurance Specialist
Company Licensing & Registration

Texas Department of Insurance



Certificate No. 13931

Company No. 02-071970

Certificate of Authority

THIS IS TO CERTIFY THAT

SYMETRA LIFE INSURANCE COMPANY

BELLEVUE, WASHINGTON

has complied with the laws of the State of Texas applicable thereto and is hereby authorized to transact the business of

Life; Accident; Health;
Variable Annuity and Variable Life

insurance within the state of Texas. This Certificate of Authority shall be in full force and effect until it is revoked, canceled or suspended according to law.



IN TESTIMONY WHEREOF, witness my hand and seal of office at Austin, Texas, this

14th day of October A.D. 2005

MIKE GEESLIN
COMMISSIONER OF INSURANCE

BY [Signature]
for Godwin Ohaechesi, Director
Company Licensing & Registration



SEP 28 2004

MERWIN U. STEWART
Utah Insurance Department
Insurance Commissioner

OLENE S. WALKER
Governor

STEVEN G. FRY, CPA
Examination Division
Chief Financial Examiner

September 17, 2004

Judy Walter, Assistant Vice President
Safeco Life and Investments
5069 154th PL NE
Redmond, WA 98052

RE: Name Change of Safeco Life Insurance Company to Symetra Life Insurance Company

Certificate of Authority Amendment

Dear Ms. Walter:

Enclosed is the Certificate of Authority for the name change of Safeco Life Insurance Company to Symetra Life Insurance Company amended by the Utah Insurance Department. The Certificate of Authority indicates the types of insurance the company is authorized to transact in the State of Utah. A company cannot be licensed for a line if it is not authorized in the domestic state.

Please be advised that all policies, forms and rates proposed for use by the company in the State of Utah must be submitted to the Life Division for life policies, Health Division for health policies, or Property Casualty Division for property casualty policies at the Utah Insurance Department.

If I can provide any additional information or assistance regarding this change, please contact me.

Sincerely,

Beth A. Crim
Company Licensing
Examination Division

Enclosure

Utah!

Where ideas connect



UTAH INSURANCE DEPARTMENT
Certificate of Continuation

This is to certify that SYMETRA LIFE INSURANCE COMPANY has complied with the requirements for continuation of the Certificate of Authority in the State of Utah for the license year beginning Mar 1, 2013 through Feb 28, 2014 for the following lines of insurance:

Utah ID #: 675
NAIC Co Code #: 68608
NAIC Group Code #: 0163
Status:
Company Type: Life

Types of Insurance Lines Authorized to Transact:

Accident & Health-Life
Annuity-Life
Life
Variable Contract-Life

COMMONWEALTH OF VIRGINIA

ALFRED W. GROSS
COMMISSIONER OF INSURANCE
STATE CORPORATION COMMISSION
BUREAU OF INSURANCE



P.O. BOX 1157
RICHMOND, VIRGINIA 23218
TELEPHONE: (804) 371-9741
TDD/VOICE: (804) 371-9206
<http://www.state.va.us/scc>

September 2, 2004

Kristi Morgan
Safeco Life and Investments Companies
State Filing/Compliance F-3
P.O. Box 34690
Seattle, WA 98124-8900

RE: Company Name Change

Dear Ms. Morgan:

Enclosed is the Virginia license of Symetra Life Insurance Company [formerly: Safeco Life Insurance Company] reflecting the recent name change of the company. The effective date of the name change in Virginia is the date shown on the license.

Any agent licensing questions should be directed to the Agents' Licensing Section at (804) 371-9631. Any questions regarding form and rate filings should be directed to the appropriate Forms and Rates Section (804) 371-9965 for property and casualty companies or (804) 371-9110 for life and health companies.

Please feel free to contact me if you have any additional questions.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Gayle Henderson'.

(Miss) Gayle Henderson
Office Supervisor
Financial Regulation Division
(804) 371-9869

Enclosure

Commonwealth of Virginia

STATE CORPORATION COMMISSION

July 1, 2013

SYMETRA LIFE INSURANCE COMPANY
SYMETRA FINANCIAL CENTER
777 108TH AVE NE STE 1200
BELLEVUE WA 98004-5135

is hereby licensed to transact the business of

| | |
|----------------------------|--------------------|
| Accident & Sickness | Industrial Life |
| Annuities | Life |
| Credit Accident & Sickness | Variable Annuities |
| Credit Life | Variable Life |

in the Commonwealth of Virginia through the thirtieth day of June next succeeding the date hereof unless this license shall be sooner revoked or otherwise cancelled.

ID: 68608



State Corporation Commission
Bureau of Insurance

By: Jacqueline K. Cuffman
Commissioner

RECD DEC 07 2004

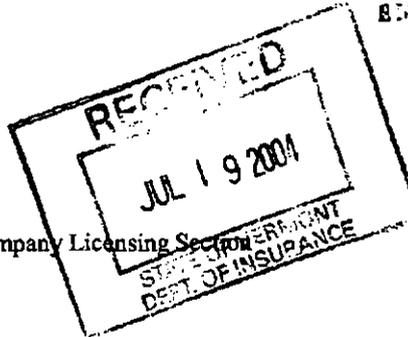


SAFECO LIFE AND INVESTMENTS

5069 154th PL NE
Redmond, WA 98052

July 16, 2004

Vermont Department of Insurance Company Licensing Section
89 Main Street, Drawer 20
Montpelier, VT 05620



VERMONT DEPARTMENT OF BANKING, INSURANCE, SECURITY AND
REGULATORY ADMINISTRATION

COMPANY LICENSING

Kim [Signature] 11/30/04
ENCLOSED AS REQUESTED

EMAIL: COMPLIC@BISHCA.STATE.VT.US
802-628-2479

Phone: (800) 210-1106, ex. 65464

Fax: (425) 376-5466

Email: judwal@safeco.com

RE: Uniform Certificate of Authority (UCAA) Corporate Amendment Application – Name Change Only
Safeco Life Insurance Company - NAIC 68608 FEIN 91-0742147
Name Change to – Symetra Life Insurance Company, effective 9/1/04

To Whom It May Concern:

Enclosed are the application and fees to amend the Certificate of Authority for Safeco Life Insurance Company, a Washington corporation (the "Company"), to reflect the change in its corporate name to Symetra Life Insurance Company, effective September 1, 2004. Should your Department be unable to complete the processing of this application by September 1, 2004, we respectfully request that the amended Certificate of Authority be effective retroactive to September 1, 2004.

This application is made pursuant to the NAIC's Uniform Certificate of Authority Amendment process, and is organized in the following order:

1. UCAA Corporate Amendments Application Form and attachments, including:
 - a. Checklist
 - b. Original Certificate of Authority
2. Filing Fee
3. Certified copy of the amended Articles of Incorporation reflecting the name change in Article II
4. Certified copy of the amended Bylaws reflecting the name change
5. Uniform consent to Service of Process reflecting the name change
6. State of Domicile Approval
7. State-Specific Information
8. Name Approval

For purposes of background only, please be advised that the Company's Board of Directors approved this change in the Company's name in anticipation of a change in control of the Company, for which a Form A is currently pending in the Company's state of domicile. The Form A addresses the agreement by Safeco Corporation to sell the Company and certain of its affiliates to a group of investors led by White Mountains Insurance Group, Ltd. and Berkshire Hathaway, Inc. The sale is expected to close before the end of the third quarter 2004, following regulatory approvals and other customary closing conditions. While ownership of the Company will change, no changes in the Company's management, operations, or principal location are expected in the near term. Although this UCAA filing precedes the closing of the

sale, the name change will go into effect on September 1, 2004 regardless of whether or not the sale closes as expected in the third quarter of 2004.

If changes to any of the submitted items occur during the filing process, the application will be updated accordingly. Additionally, we anticipate no interruption in annual and quarterly financial statements.

Any assistance you can provide to ensure that this filing is handled in a timely manner is appreciated. Please do not hesitate to contact me, or Kristie Morgan, if you have any questions regarding this application. I will be out of the office from 7/21 through 7/26. Kristie will be out 7/28 through 7/30. Our contact information is as follows:

Judy Walter (800) 210-1106, ext. 65464 or (425) 376-5464 judwal@safeco.com
Kristie Morgan (800) 210-1106, ext 68176 or (425) 376-8176 krimor@safeco.com

Best Regards,



Judy Walter
Assistant Vice President
Safeco Life Insurance Company

State of Vermont

No. 1557_P



Department of Banking, Insurance, Securities and Health Care Administration

Foreign Insurance Company License

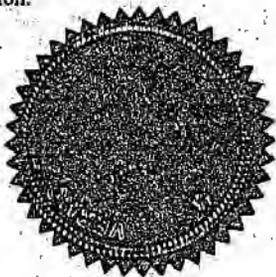
As of September 1, 2004

This is to Certify that the SYMETRA LIFE INSURANCE COMPANY of WASHINGTON, having complied with the requirements of the laws of this state relating to insurance companies organized under the laws of other states and foreign countries, as contained in Title 8, Chapter 101, Subchapter 2 of Vermont statute, is hereby fully licensed and authorized to transact in this State the insurance business authorized by its Charter and domicile state, in accordance with the Laws of the State of Vermont.

This license shall continue in force until the first day of March following the date set forth below and for consecutive annual periods thereafter upon timely payment of the required renewal license fee and contingent upon otherwise qualifying for the license continuance, unless revoked, suspended or modified by the Commissioner of Banking, Insurance, Securities and Health Care Administration.

Dated at Montpelier, Vermont this

30th day of NOVEMBER, 2004



John P. Crowley
COMMISSIONER OF BANKING, INSURANCE, SECURITIES
AND HEALTH CARE ADMINISTRATION

Formally Known as: Safeco Life Insurance Company

Form 915/FRN 11/9

AMENDED
No. 66

Certificate of Authority

STATE OF WASHINGTON
INSURANCE COMMISSIONER
OLYMPIA

THIS IS TO CERTIFY, That

SYMETRA LIFE INSURANCE COMPANY

Bellevue ~~Seattle~~, Washington

organized under the laws of WASHINGTON presented satisfactory evidence of compliance with the Insurance Code of the State of Washington and is therefore granted this Certificate of Authority, authorizing the company, subject to all provisions of this Certificate, to transact the following classes of insurance:

Life
Disability

as such classes are now or may hereafter be defined in the Revised Code of Washington.

THIS CERTIFICATE is expressly conditioned upon the holder being and remaining in full compliance with, and not in violation of, all of the applicable laws and lawful requirements made under authority of the laws of the State of Washington.

THIS CERTIFICATE will be automatically revoked upon failure to annually apply for renewal or pay the statutory fee for renewal.

THIS CERTIFICATE IS NOT TRANSFERABLE WITHOUT THE PRIOR WRITTEN CONSENT OF THE COMMISSIONER.

IN WITNESS WHEREOF, effective as of the 1st day
of September, 2004, I have hereunto set my hand
and caused my official seal to be affixed this 30th day of
June, 2004.



Mike Kreidler
Insurance Commissioner

By [Signature]
Acting Deputy Insurance Commissioner

Originally licensed as General Life Company of America.
Name changed to LifeCo Insurance Company of America eff. 8/5/1959.
Name changed to Safeco Life Insurance Company eff. 9/1/1984.

UNITED STATES OF AMERICA

The State of  Washington
Secretary of State

I, **Sam Reed**, Secretary of State of the State of Washington and custodian of its seal,
hereby issue this

certificate that according to records on file in this office,

SYMETRA LIFE INSURANCE COMPANY

a Washington Insurance Company, was approved by the Insurance
Commissioner's Office on January 27, 1957 and filed Articles of Incorporation with this
office on January 27, 1957; and I further certify that under Washington state laws
insurance companies are exempt from yearly license fees with this office
and maintaining a registered agent/registered office address.

Date: August 2, 2005



Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital



Sam Reed, Secretary of State

AMENDED
No. 66

Certificate of Authority

STATE OF WASHINGTON
INSURANCE COMMISSIONER
OLYMPIA

THIS IS TO CERTIFY, That

SYMETRA LIFE INSURANCE COMPANY

Bellevue ~~Seattle~~, Washington

organized under the laws of WASHINGTON presented satisfactory evidence of compliance with the Insurance Code of the State of Washington and is therefore granted this Certificate of Authority, authorizing the company, subject to all provisions of this Certificate, to transact the following classes of insurance:

Life
Disability

as such classes are now or may hereafter be defined in the Revised Code of Washington.

THIS CERTIFICATE is expressly conditioned upon the holder being and remaining in full compliance with, and not in violation of, all of the applicable laws and lawful requirements made under authority of the laws of the State of Washington.

THIS CERTIFICATE will be automatically revoked upon failure to annually apply for renewal or pay the statutory fee for renewal.

THIS CERTIFICATE IS NOT TRANSFERABLE WITHOUT THE PRIOR WRITTEN CONSENT OF THE COMMISSIONER.

IN WITNESS WHEREOF, effective as of the 1st day
of September, 2004, I have hereunto set my hand
and caused my official seal to be affixed this 30th day of
June, 2004.



Mike Kreidler

Insurance Commissioner

By

Michael A. Linn

Acting Deputy Insurance Commissioner

Originally licensed as General Life Company of America.
Name changed to Lifeo Insurance Company of America eff. 8/5/1959.
Name changed to Safeco Life Insurance Company eff. 9/1/1964.

SEP 28 2004



State of Wisconsin / OFFICE OF THE COMMISSIONER OF INSURANCE

Jim Doyle, Governor
Jorge Gomez, Commissioner

125 South Webster Street • P.O. Box 7873
Madison, Wisconsin 53707-7873
Phone: (608) 266-3585 • Fax: (608) 266-9935
E-Mail: information@oci.state.wi.us
Web Address: oci.wi.gov

Wisconsin.gov

09/22/2004

JUDY WALTER, ASS'T VICE PRESIDENT
SYMETRA LIFE INS CO
PO BOX 34690
SEATTLE WA 98124-1690

Re: Amended Certificate of Authority

I am enclosing the following material in connection with the licensing of your company

1. Amended Certificate of Authority indicating:

a. Name Changed

b. Redomestication

c. Added or Deleted Lines of Business

2. ~~Invoice which reflects statutory and/or retaliatory fees for services.~~

Sincerely,

Jackie Karls
Jackie Karls
Program Assistant
Bureau of Financial Analysis and Examinations
(608) 266-9891

Enclosures

***Certificate of Authority
State of Wisconsin***

Office of the Commissioner of Insurance

Certificate No.: 11862
Date Issued: 09/01/2004
License Chapter: 618 Wis. Stat.

This is To Certify, That pursuant to the Insurance Laws of the state of Wisconsin,

Symetra Life Insurance Company

Washington

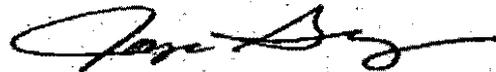
Has paid the fees and taxes required by law and that it is hereby authorized to transact the business of:

- 1A Life insurance and annuities (Participating and Non participating)
- 1B Variable life insurance and variable annuities
- 1C Disability insurance

Subject to the following limitations:

NONE

In the state of Wisconsin as long as the insurer continues to conform to the authority granted by this certificate, is in full compliance with all, and not in violation of any, of the applicable laws and lawful requirements made under authority of the laws of the state of Wisconsin.



Commissioner of Insurance



STATE OF WEST VIRGINIA
Offices of the Insurance Commissioner

Financial Conditions
Division

BOB WISE
Governor

JANE L. CLINE
Insurance Commissioner

August 18, 2004

Judy Walter
Assistant Vice President
Safeco Life and Investments
5069 154th Place NE
Redmond WA 98052

Re: Name Change from Safeco Life Insurance Company
to Symetra Life Insurance Company
WV File #: 0655
NAIC #: 68608

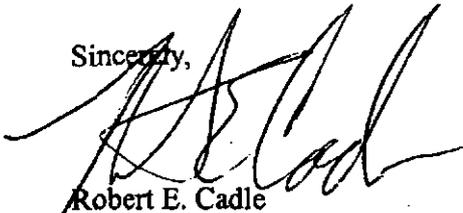
Dear Ms. Walter:

Enclosed is the Certificate of Authority, amended to reflect the change of name from Safeco Life Insurance Company to Symetra Life Insurance Company, effective as of September 1, 2004.

Also, please remit a copy of the Certificate of Deposit from the state of domicile as soon as it becomes available.

Please contact this office at (304) 558-2100 if we may be of further assistance.

Sincerely,


Robert E. Cadle
Financial Analyst
Financial Conditions Division

REC/mlf

Enclosure

West Virginia Offices of the Insurance Commissioner



Certificate of Authority

Whereas, **SYMETRA LIFE INSURANCE COMPANY**, domiciled in the State of **WASHINGTON**, has complied with all the requirements of the laws of this State so as to entitle it to transact its appropriate business in the State of West Virginia.

Therefore, I the undersigned, Insurance Commissioner of the State of West Virginia, pursuant to the authority vested in me by the laws of this State, do hereby authorize it to transact the business of insurance as defined in Chapter 33

ACCIDENT & SICKNESS - ARTICLE 1, SECTION 10(b)

LIFE - ARTICLE 1, SECTION 10(a)

VARIABLE CONTRACTS - ARTICLE 13A

of the 1931 Code of West Virginia as amended, in the State of West Virginia in accordance with the laws thereof until midnight on the 31st day of May, 2014, unless this license be sooner revoked. Pursuant to W. Va. Code §33-3-2(c), the above authorization does not allow the insurer to transact a kind of insurance in this State unless duly authorized or qualified to transact such insurance in the state or country of its domicile.

In Testimony Whereof, I have hereunto set my hand and affixed my seal of office at the City of Charleston this 1st day of June, 2013.

A handwritten signature in cursive script that reads "Michael D. Riley".

Michael D. Riley
Insurance Commissioner

NAIC # 68608
WV File # 0655

State of West Virginia



Certificate

*I, Betty Ireland, Secretary of State of the
State of West Virginia, hereby certify that*

an application to withdraw was filed for

SYMETRA LIFE INSURANCE COMPANY

indicating their intent to Withdrawal from transacting business in West Virginia as required
by the provisions of the West Virginia Code and was found to conform to law.

Therefore, I issue this

CERTIFICATE OF WITHDRAWAL



*Given under my hand and the
Great Seal of the State of
West Virginia on this day of
December 26, 2007*

Betty Ireland

Secretary of State

THE STATE



OF WYOMING

Insurance Department

Herschler Building · 122 West 25th Street · Cheyenne, Wyoming 82002

September 1, 2004

Judy Walter
Assistant Vice President
Safeco Life Insurance Company
5069 154th Place, NE
Redmond, WA 98052

RE: Certificate of Authority

Dear Ms. Walter:

Enclosed please find the amended Certificate of Authority for Symetra Life Insurance Company.

Check it over carefully for accuracy. If there is any problem, please return it for changes.

If you have any questions, please call me at (307) 777-6870.

Sincerely,

A. Lucero

Alice Lucero
Administrative Specialist

al
Enclosure

State of Wyoming



Department of Insurance

10/1/2005 American States Life Insurance Company merged into Symetra Life Insurance Company

CERTIFICATE OF AUTHORITY

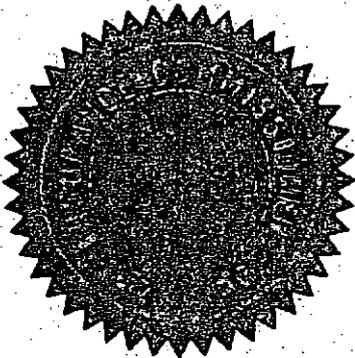
September 21, 1959

It is hereby Certified, That the Symetra Life Insurance Company, NAIC No: 68608, organized under the laws of Washington and whose principal office is located at Home: 777 108th Avenue, NE, Suite 1200, Bellevue, Washington 98004-5135, Mail: P.O. Box 34690, Seattle, Washington 98124-1690 has complied with all applicable laws of this state, and is hereby authorized to transact business as an insurer to the following types of insurance and coverages as defined by the Wyoming Insurance Code:

Life
Disability
Variable Products

This Certificate of Authority shall remain continuously in force as long as the insurer is entitled thereto under the laws of this state; subject, however, to the requirement that the insurer make timely payment of all fees and taxes and make due filing of its Annual Statements.

In Testimony Whereof, I have hereunto set my hand and affixed my seal of office, at the City of Cheyenne, the day and year first above written.



Kenneth G. Vines
Kenneth G. Vines, Insurance Commissioner

6-04

Exhibit 6-6

AFFIDAVIT

The undersigned hereby attests to the following:

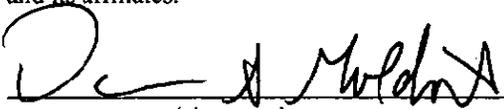
Symetra Life Insurance Company is a direct, wholly-owned subsidiary of Symetra Financial Corporation, Inc., a Delaware corporation that is publicly traded on the New York Stock Exchange.

The ultimate controlling person with respect to Symetra Financial Corporation, Inc. is White Mountains Insurance Group, Ltd. ("White Mountains"), a Bermuda limited liability company. The home office address of White Mountains is 14 Wesley Street, 5th Floor, Hamilton HM 11, Bermuda. The principal executive office of White Mountains is 80 South Main Street, Hanover, NH 03755-2053. The principal business of White Mountains is that of an insurance holding company.

As of December 31, 2012, no person owns ten percent or more of any class of voting security of White Mountains other than as set forth below:

Franklin Mutual Advisers, LLC ("Franklin"), 101 JFK Parkway, Short Hills, NJ 07078, was beneficial owner of 1,456,457 common shares of White Mountains (the "Common Shares"). Franklin's holdings represented 22.1% of the total Common Shares outstanding and were acquired for investment purposes on behalf of client investment advisory accounts.

Franklin has furnished the State of Washington Office of Insurance Commissioner (the "OIC") with a Supplemental Disclaimer of Control for the purpose of assuring the OIC that it will not exercise or attempt to exercise a controlling influence over the management or policies of White Mountains or Symetra Financial Corporation, Inc. and its affiliates.



(signature)

Name: David S. Goldstein
Title: Senior Vice President, General Counsel & Secretary, Symetra Life Insurance Company

Date: January 10, 2014



Notary Public

ANN ERNST
Printed Notary Name

02-14-17
My commission expires



Applicant Name: Symetra Life Insurance Company

NAIC No. 68608
FEIN: 91-0742147

6-11

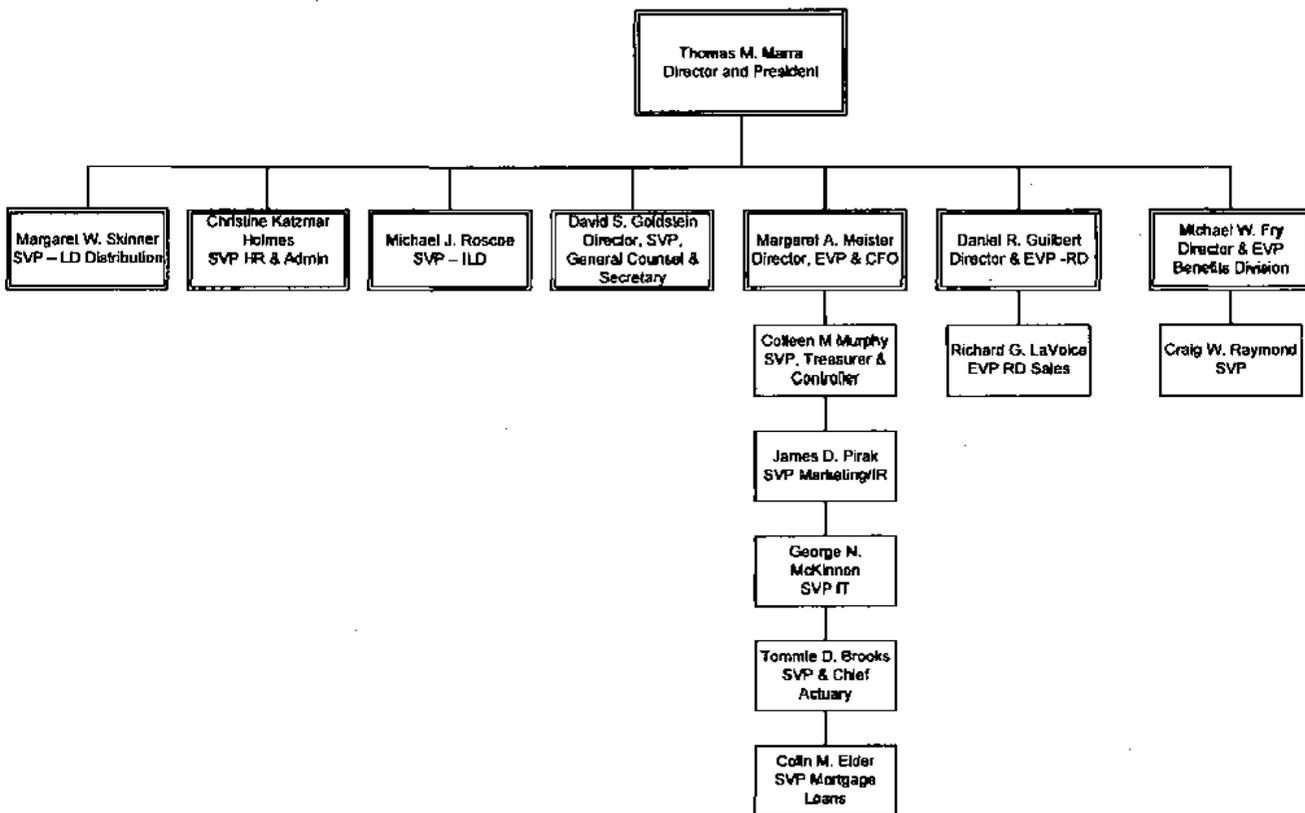
Exhibit 6-11

The legal actions to which the applicant is a party that do not arise out of a policy claim are limited to the following:

1. In Re Quebecor World: this is a bankruptcy matter where the applicant was named as one of multiple defendants related to the redemption of private placement notes. The applicant, along with other defendants, moved and prevailed on a motion for summary judgment. That order is currently on appeal. Given the previous ruling, we believe there is limited liability exposure for the applicant. The maximum exposure for the applicant in a worst case scenario is \$7,000,000, plus interest.

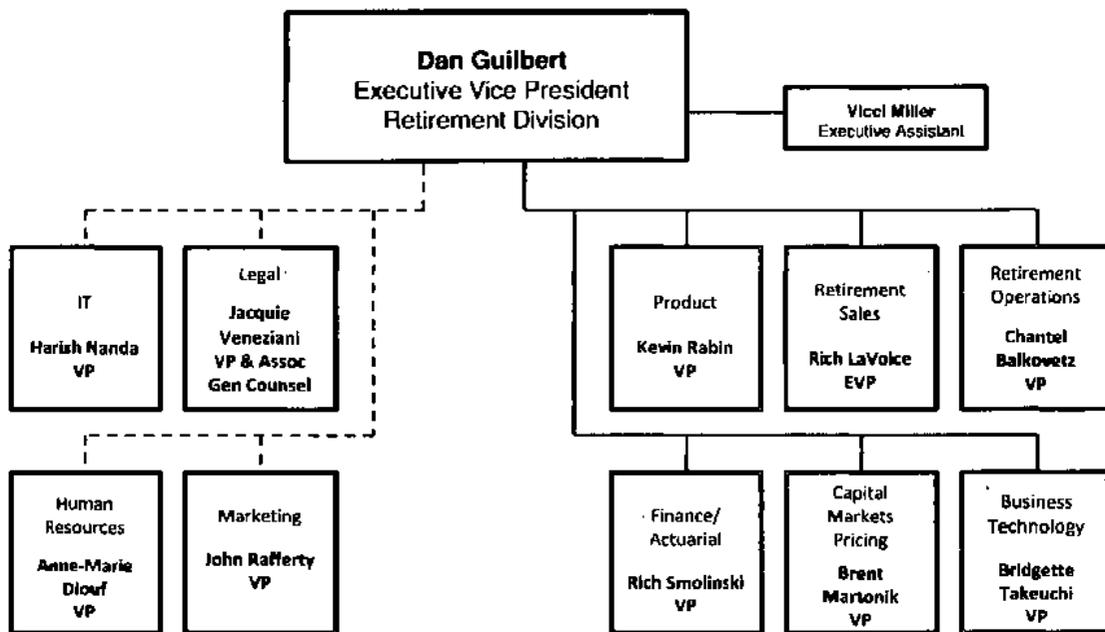
2. In Re Tribune: this is another bankruptcy litigation where, again, the applicant was named of one of multiple defendants related to the redemption of stock. The matter is years from resolution, although we believe there is limited liability. The maximum exposure for the applicant in a worst case scenario is \$4,817,000, plus interest.

Exhibit 6-15.1 Management Organization Chart of Applicant



b-15.1

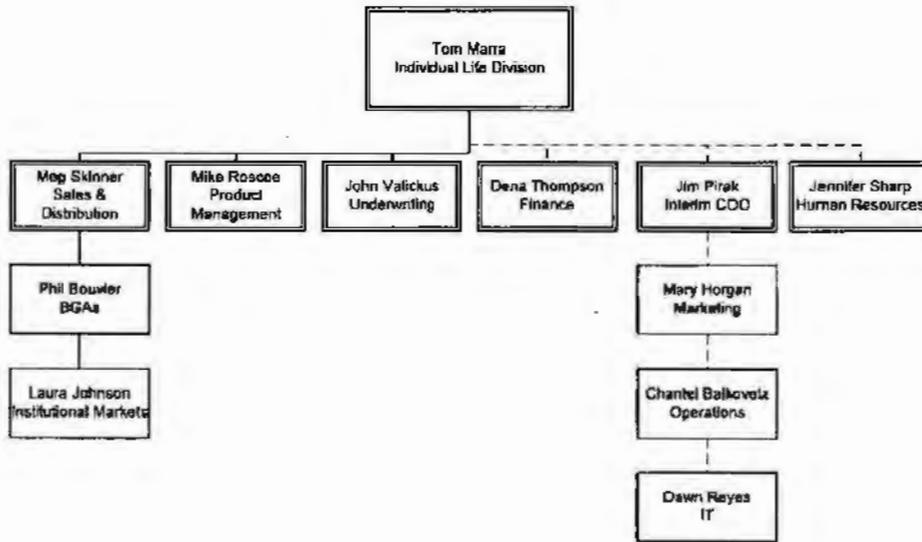
Exhibit 6-15.2 Management Organization Chart for Retirement Division of Applicant



January 14

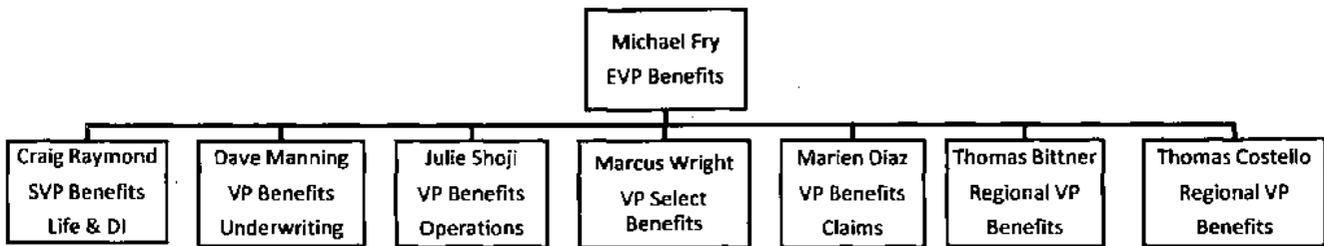
6.15.2

Exhibit 6 – 15.3 Management Organization Chart for Individual Life Division of Applicant



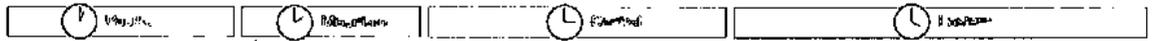
b-15.3

Exhibit 6 -15.4 Management Organization Chart for Benefits Division of Applicant



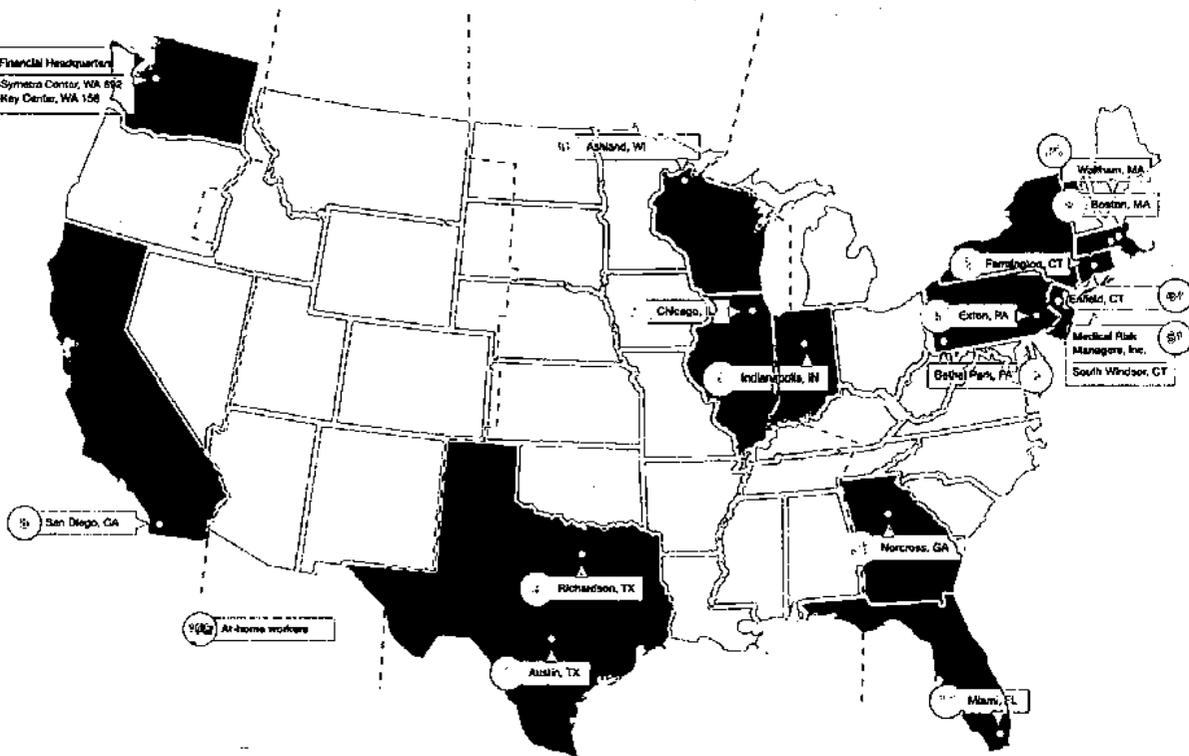
6.15.4

Field Offices and Subsidiaries



6 = Number of employees as of 5/13

Symetra Financial Headquarters
Bellevue-Symetra Center, WA 982
Bellevue-Key Center, WA 156



Symetra Financial Corporation
777 108th Avenue NE, Suite 1200
Bellevue, WA 98004
www.symetra.com

Symetra® is a registered service mark of Symetra Life Insurance Company.

615.5

Applicant Name: Symetra Life Insurance Company

NAIC No. 68608
FEIN: 91-0742147

6.15.6

Exhibit 6-15.6

List of Executives and Key Staff with Access to Bank Accounts

The following employees of the applicant have banking authority in accordance with applicant's Corporate Resolution and Certificate of Incumbency currently on file at applicant's banks:

- Glenn Black
- Julie Bodmer
- Tommie Brooks
- Alan Czarnecki
- Kathryn Englund
- Daniel Guilbert
- Michael James
- Gregory Lyons
- Thomas Marra
- Margaret Meister
- Colleen Murphy
- Michael Murphy
- Jacqueline Veneziani

The following employees are involved in executing payment and deposit transactions as part of their responsibilities in the Disbursement Operations Department:

- Kimberly Leonard
- Ken Ong
- Melissa Pessoa
- Lin Ross
- Matt Stroh
- Patricia Wong

6.158

PROSPECTOR PARTNERS, LLC

INVESTMENT MANAGEMENT AGREEMENT

PROSPECTOR PARTNERS, LLC, a Delaware limited liability company (the "Adviser"), having an address at 370 Church Street, Guilford, Connecticut 06437, and Symetra Financial Corporation, a Delaware corporation ("Symetra"), having an address at 777 108th Avenue N.E., Suite 1200, Bellevue, WA 98004-5135, hereby enter into this Investment Management Agreement, effective as of July 1, 2010 (this "Agreement"), and hereby agree that the Adviser shall act as discretionary adviser with respect to the specified assets of Symetra and/or each of its subsidiaries who are signatories to this Agreement (each, a "Client") on the following terms and conditions:

- 1) **Investment Accounts.** The investment account of each Client (each an "Investment Account") shall consist of cash and securities in an amount equal to at least \$50,000,000 (the "Minimum Account Amount"), or such other amount as may be agreed to by the Adviser, initially furnished by the Client for investment pursuant to this Agreement, as well as all other assets which become part of each Investment Account as a result of trading therein or additions thereto, except for amounts withdrawn therefrom and paid to the Client. Each Client may make additions to the Investment Account in amounts exceeding \$100,000, or in such other amount as may be agreed to by the Adviser; provided that the Adviser shall have received prompt written notice of such additions. Each Client may make withdrawals from its Investment Account in such amounts as it shall determine upon not less than 30 days prior written notice thereof to the Adviser and provided that the withdrawal shall not cause the assets in the Investment Account to fall below the Minimum Account Amount, unless otherwise agreed to by the Adviser.

- 2) **Services of Adviser.** By execution of this Agreement the Adviser accepts appointment as adviser for each Investment Account with full discretion and agrees to supervise and direct the investments of each Investment Account in accordance with the investment objective, policies and restrictions attached hereto as Schedule 1, and as may be modified from time to time ("Investment Guidelines"). Adviser acknowledges that Clients are bound by state insurance laws regarding permissible investments and Clients' own adopted Statement of Investment Policy, including any Addendums, attached hereto as Schedule 2, and as may be modified from time to time, applicable to Clients' aggregate investable assets (the "Investment Policy"). Adviser has read the Investment Policy and understands that Clients' Investment Guidelines, to be furnished to Adviser from time to time, will not deviate from the Investment Policy but will only summarize the provisions and limitations applicable to each Investment Account. In the performance of its services, the Adviser will not be liable for any error in judgment or any acts or omissions to act except those resulting from the Adviser's gross negligence, willful misconduct or malfeasance. Nothing herein shall in any way constitute a waiver or limitation of any right of any person under the federal securities laws. The Adviser shall have no responsibility whatsoever for the management of any assets of Clients other than such entities' Investment Account.

- 3) **Discretionary Authority.** Subject to the Investment Guidelines, the Adviser shall have full discretion and authority, without obtaining any prior approval, as the Client's agent and attorney-in-fact: (a) to make all investment decisions in respect of each Investment Account on the Client's behalf and at the sole risk of the Client; (b) to buy, sell, exchange, convert, liquidate or otherwise trade in any stock, bond and other securities or financial instruments in respect of each Investment Account; (c) to place orders with respect to, and to arrange for, any of the foregoing; and (d) in furtherance of the foregoing, to do anything which the Adviser shall deem requisite, appropriate or advisable in connection therewith, including, without limitation, the selection of such brokers, dealers, and others as the Adviser shall determine in its absolute discretion.
- 4) **Custody.** The assets of each Investment Account shall be held in one or more separately identified accounts in the custody of one or more banks, trust companies, brokerage firms or other entities designated by the Client and acceptable to the Adviser. The Adviser will communicate its investment purchase, sale and delivery instructions directly with the party identified by the Client or other qualified depositories. The Client shall be responsible for all custodial arrangements and the payment of all custodial charges and fees, and the Adviser shall have no responsibility or liability with respect to custody arrangements or the acts, omissions or other conduct of the custodians.
- 5) **Brokerage.** When placing orders for the execution of transactions for an Investment Account, the Adviser may allocate all transactions to such brokers or dealers, for execution on such markets, at such prices and commission rates, as are selected by the Adviser in its sole discretion. In selecting brokers or dealers to execute transactions, the Adviser need not solicit competitive bids and does not have an obligation to seek the lowest available commission cost. It is not the Adviser's practice to negotiate "execution only" commission rates, and, in negotiating commission rates, the Adviser shall take into account the financial stability and reputation of brokerage firms and brokerage and research services provided by such brokers. An Investment Account may be deemed to be paying for research provided or paid for by the broker which is included in the commission rate although the Investment Account may not, in any particular instance, be the direct or indirect beneficiary of the research services provided. Research furnished by brokers may include, but is not limited to, written information and analyses concerning specific securities, companies or sectors; market, finance and economic studies and forecasts; financial publications; statistics and pricing services; discussions with research personnel; and software and data bases utilized in the investment management process. Symetra acknowledges on behalf of each Client that since commission rates are generally negotiable, selecting brokers on the basis of considerations which are not limited to applicable commission rates may at times result in higher transaction costs than would otherwise be obtainable. The Adviser is hereby authorized to, and Symetra acknowledges on behalf of each Client that the Adviser may aggregate orders on behalf of each Investment Account with orders on behalf of other clients of the Adviser. In such event, allocation of the securities purchased or sold, as well as expenses incurred in the transaction, shall be made in a manner which the

Adviser considers to be the most fair and equitable to all of its clients, including the Clients.

6) Representations and Warranties

a) Symetra represents, warrants and agrees that:

- i) it has full legal power and authority to enter into this Agreement;
- ii) the appointment of the Adviser hereunder is permitted by each Client's governing documents and any investment management agreement between Symetra and the Clients to this Agreement and has been duly authorized by all necessary corporate or other action; and
- iii) it will indemnify the Adviser and hold it harmless against any and all losses, costs, claims and liabilities which the Adviser may suffer or incur arising out of any material breach of these representations and warranties of Symetra.

b) The Adviser represents, warrants and agrees that:

- i) it has full legal power and authority to enter into this Agreement;
- ii) it is registered as an investment adviser with the Securities and Exchange Commission pursuant to the Investment Advisers Act of 1940, as amended (the "Advisers Act");
- iii) entering into this Agreement has been duly authorized by all necessary action; and
- iv) it will indemnify Symetra and hold it harmless against any and all losses, costs, claims and liabilities which Symetra or any Client may suffer or incur arising out of any material breach of any representations and warranties of the Adviser.

7) Reports. The Adviser shall provide Symetra with reports containing the status of the Investment Account at least monthly (i.e. "Flash Report"), and will provide written advisory report letters on a quarterly basis. All records maintained pursuant to this Agreement shall be subject to examination by Symetra and by persons authorized by it, or by appropriate governmental authorities, at all times upon reasonable notice. The Adviser shall provide copies of trade tickets, custodial reports and other records Symetra reasonably requires for accounting, tax, regulatory, or audit purposes.

8) Management Fee and Expenses

a) The Adviser will be paid a quarterly management fee (the "Management Fee") for its investment advisory services provided hereunder, determined in accordance with Exhibit A to this Agreement. During the term of this Agreement, the Management Fee shall be billed and payable in arrears on a quarterly basis within 10 days after the

last day of each calendar quarter based upon the value of the Investment Accounts as of the last day of the immediately preceding calendar quarter, and showing that portion of the Management Fee attributable to each Investment Account. The Management Fee shall be pro-rated for any partial quarter. It is understood that, in the event that the Management Fee is to be paid by the custodian out of the Investment Accounts, Symetra or the Clients will provide written authorization to the custodian to pay the Management Fee directly from the Investment Accounts.

- b) Each Investment Account shall be responsible for all expenses incurred directly in connection with transactions effected on behalf of the Investment Account pursuant to this Agreement and shall include: custodial fees; PAM accounting service fees, investment expenses such as commissions; Infomediary transactions fees and other expenses reasonably related to the purchase, sale or transmittal of Investment Account assets (other than research fees and expenses with respect to the Investment Account).

9) Confidential Relationship.

- a) The Parties hereby agree that all of the information provided to Symetra by the Adviser and to the Adviser by Symetra shall be considered proprietary and confidential in nature (hereinafter, the "Confidential Information") and, as such, shall not be disclosed or revealed or caused to be disclosed or revealed, in any manner, to any non-party to this Agreement, except:
 - i) as may be required by law or any judicial, regulatory or self-regulatory authority (including without limitation any required filing with the SEC or any state insurance regulator), provided that notice of any such disclosure is at the time sent to the other party, except that no notice will be required for routine SEC or department of insurance filings,
 - ii) as either party may consent to specifically in advance in writing; provided, however, that
 - iii) any such Confidential Information may be disclosed to each party's officers, directors, employees, consultants, contractors, advisors, and fiduciaries ("Representatives") who need to know such information in order to carry out the purpose of the disclosure and so long as they agree to keep it confidential;
 - iv) "Confidential Information" does not include any information which (A) is or subsequently becomes published or available to the public other than by breach of this Agreement, (B) is received by receiving party from a non-party not in breach of any obligation of confidentiality, (C) is independently developed by receiving party, or (D) was in receiving party's possession or known to receiving party before disclosing party disclosed it to receiving party; and
 - v) Adviser Confidential Information does not include the identification of Symetra

as a Client or a Client's investments as of a given point in time (which is consistent with (iv) (A) above).

b) Symetra agrees that:

- i) Adviser may disclose that Symetra (and each of the Clients) is a client of the Adviser and to the inclusion of Symetra on a list of representative clients of the Adviser or in other marketing materials;
- ii) Adviser shall be permitted to retain copies of all documentation necessary under the Advisers Act to support the track record or otherwise required to be retained under the Advisers Act and related rules, but only for such period as required to be retained; and
- iii) Symetra shall not allow the Confidential Information to be used to purchase, sell, trade or invest in any securities, instruments or other investments owned by the Account without obtaining the prior written consent of the Adviser, unless such consent is impossible or impractical due to an event of force majeure that interferes with Adviser's performance under this Agreement; and further acknowledges that:
- iv) the provisions of (b) are reasonable and necessary for the protection of the Adviser and its affiliates, and
- v) the Adviser or its affiliates will be irrevocably damaged if the covenants herein are not specifically enforced and, accordingly, Symetra hereby further agrees that, in addition to any other relief or remedies available to the Adviser, the Adviser shall be entitled to seek and obtain an appropriate injunction or other equitable remedy from a court with proper jurisdiction for the purposes of restraining Symetra from any actual or threatened breach of such covenant, and no bond or security will be required in connection therewith. In any event, Symetra shall be responsible for any breach of this Agreement by any of Symetra's Representatives, and Symetra agrees, at its sole expense, to take all reasonable measures (including, without limitation, court proceedings) to restrain its Representatives from prohibited or unauthorized disclosure or use of the Confidential Information or any other breach of the terms of this Agreement.

c) Adviser agrees that:

- i) Symetra shall be permitted to report the Investment Track Record (on a stand-alone basis, as part of its total portfolio return or otherwise) with respect to the Investment Accounts in any internal or external reports of it or its affiliates; and
- ii) Symetra and/or its affiliates will be irrevocably damaged if the covenants herein are not specifically enforced and, accordingly, Adviser hereby further agrees that, in addition to any other relief or remedies available to Symetra, Symetra shall be

entitled to seek and obtain an appropriate injunction or other equitable remedy from a court with proper jurisdiction for the purposes of restraining Adviser from any actual or threatened breach of such covenant, and no bond or security will be required in connection therewith. In any event, Adviser shall be responsible for any breach of this Agreement by any of its Representatives, and Adviser agrees, at its sole expense, to take all reasonable measures (including, without limitation, court proceedings) to restrain its Representatives from prohibited or unauthorized disclosure or use of the Confidential Information or any other breach of the terms of this Agreement.

- 10) Non-Assignability. No "assignment", as that term is defined in the Advisers Act, of this Agreement shall be made by the Adviser or Symetra without the written consent of the other party.
- 11) Directions to the Adviser. All directions by Symetra by or on behalf of the Clients to the Adviser shall be in writing signed by or on behalf of Symetra. The Adviser shall be fully protected in relying upon any such writing which the Adviser believes to be genuine and signed or presented by the proper person or persons, shall be under no duty to make any investigation or inquiry as to any statement contained therein and may accept the same as conclusive evidence of the truth and accuracy of the statements therein contained.
- 12) Consultation with Counsel. The Adviser may consult with legal counsel (who may be counsel to Symetra) concerning any question that may arise with reference to its duties under this Agreement, and the opinion of such counsel shall be full and complete protection in respect of any action taken or omitted by the Adviser hereunder in good faith and in accordance with such opinion.
- 13) Services to Other Clients. It is understood that the Adviser acts as investment adviser to other clients and may give advice and take action with respect to such clients that differs from the advice given or the action taken with respect to the Investment Accounts. Nothing in this Agreement shall restrict the right of the Adviser, its members, managers, officers, employees or affiliates to perform investment management or advisory services for any other person or entity, and the performance of such service for others shall not be deemed to violate or give rise to any duty or obligation to the Client.
- 14) Investment by the Adviser for Its Own Account. Nothing in this Agreement shall limit or restrict the Adviser or any of its members, managers, officers, employees or affiliates from buying, selling or trading any securities for its or their own account or accounts. Symetra on behalf of each Client acknowledges that the Adviser and its members, managers, officers, employees, affiliates and other clients may at any time have, acquire, increase, decrease or dispose of securities which are at or about the same time acquired or disposed of for the account of a Client. The Adviser shall have no obligation to purchase or sell for the Investment Accounts or to recommend for purchase or sale by the Investment Accounts any security that the Adviser or its members, managers,

officers, employees or affiliates may purchase or sell for itself or themselves or for any other client.

- 15) Proxies. Subject to any other written instructions of Symetra, the Adviser is hereby appointed Symetra's agent and attorney-in-fact in its discretion to vote, convert or tender in an exchange or tender offer any securities in the Investment Accounts, to execute proxies, waivers, consents and other instruments with respect to such securities, to endorse, transfer or deliver such securities and to participate in or consent to any plan of reorganization, merger, combination, consolidation, liquidation or similar plan with reference to such securities.
- 16) Sarbanes-Oxley Compliance. Symetra is subject to certain regulations ("SOX") that require management to assess the effectiveness of its internal controls over financial reporting and state in its annual report whether such internal controls are effective. Because Adviser will perform trading execution functions for Symetra's Investment Accounts as described in this Agreement, certain procedures performed by Adviser are relevant to Symetra's evaluation of its internal controls. Having acknowledged the foregoing, Adviser agrees to cooperate with Symetra as reasonably necessary to facilitate Symetra's ability to comply with its regulatory obligations.
- 17) Operational Audits. Upon Symetra's request, but no more often than once annually except (a) as necessary for Symetra or Client to respond to any regulatory requirement or inquiry, or (b) as deemed reasonably necessary by Symetra as a result of Symetra's good faith belief that Adviser has breached any of its obligations hereunder, Adviser shall allow Symetra and/or any independent third party ("Third Party Representatives") selected by Symetra to perform operational audits with respect to Adviser's performance of its obligations hereunder. Adviser shall grant Symetra and its Third Party Representatives access to Adviser's facilities, personnel, and all books, records and other documents of Adviser related to trade execution it performs for Symetra under this Agreement (not otherwise provided under section 7) ("Documentation") as may be required in order for Symetra to ascertain that trades (i) are conducted by authorized personnel, (ii) are completed, and (iii) reconcile to the accounting and custody records of Symetra and its other service providers, and such other facts relative to Adviser's performance hereunder. Symetra acknowledges that to the extent such Documentation contains aggregated data for multiple clients of Adviser, Adviser may redact certain information contained in the Documentation as reasonably necessary to meet its confidential obligations to other clients. Adviser shall provide Symetra, or its Third Party Representatives, such information and assistance as requested in order to perform such audits, including access to Adviser's personnel to explain the control environment by means of operational walk throughs or other means; provided, however, that the Parties shall endeavor to arrange such assistance in such a way that it does not interfere with Adviser's performance of the Agreement. Notwithstanding anything to the contrary in section 17, no amendment to this Agreement shall be required where the Parties mutually agree to change the scope of audits under this section to permit Symetra to comply with SOX and related laws as enacted or amended from time to time.

- 18) Notices. All notices and instructions with respect to securities transactions or any other matters contemplated by this Agreement shall be deemed duly given when delivered in writing or deposited by first-class mail to the following addresses: (a) if to the Adviser, at its address set forth above, Attention: Peter N. Perugini, CFO, or (b) if to Symetra, at its address set forth above, Attention: Margaret Meister, CFO. The Adviser or the Client may change its address or specify a different manner of addressing itself by giving notice of such change in writing to the other party.
- 19) Entire Agreement; Amendment. This Agreement sets forth the entire agreement of the parties with respect to management of the Investment Account and shall not be amended except by an instrument in writing signed by the parties hereto.
- 20) Termination. This Agreement shall continue in force from the date hereof for an initial fixed term of three years ("initial term"), which may be extended by Symetra in its sole discretion for an additional one year ("fourth year extension") at/prior to the end of the second year of the initial term, and if so extended, then, again in Symetra's sole discretion, for an additional year ("fifth year extension") at/prior to the end of the initial term. Notwithstanding the foregoing, during the initial term and any extensions, this Agreement shall be terminable without penalty by Symetra upon written notice to the Adviser at least thirty (30) days prior to the date upon which such termination is to become effective (i) for cause (including material non-performance by the Adviser), (ii) if either John Gillespie or Richard Howard are no-longer affiliated with the Adviser, or (iii) if there is a change in control of the Adviser. Following the end of the initial term and any extensions, this Agreement may be terminated without penalty by either party on 60 days written notice. Each Client shall honor any trades executed but not settled before the date of any termination under this Agreement. The fee for the calendar quarter during which any termination of this Agreement shall occur shall be paid as of the date of termination and prorated if the effective date does not coincide with the end of the quarter.
- 21) Governing Law. To the extent that the interpretation or effect of this Agreement shall depend on state law, this Agreement shall be governed by and construed in accordance with the laws of the State of Connecticut.
- 22) Effective Date. This Agreement shall become effective on the date first written above.
- 23) Receipt of Disclosure Statement. Symetra acknowledges receipt of a copy of Part II of the Adviser's Form ADV in compliance with Rule 204-3(b) under the Advisers Act more than 48 hours prior to the date of execution of this Agreement. The Adviser shall annually and without charge, upon request by Symetra, deliver to Symetra the current version of such form or a written document containing at least the information then required to be contained in such form.
- 24) Counterparts. This Agreement may be executed in two counterparts, each one of which shall be deemed to be an original.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their respective duly authorized representatives as of the date first written above.

ADVISER:

PROSPECTOR PARTNERS, LLC

By:

Title:

Date:

CLIENT:

SYMETRA FINANCIAL CORPORATION

By: *Margaret Meister*

Margaret A. Meister

Executive Vice President, Chief Financial Officer

Date: *6/29/2010*

SYMETRA LIFE INSURANCE COMPANY

By: *Margaret Meister*

Margaret A. Meister

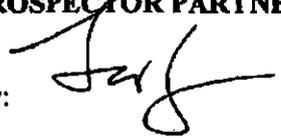
Executive Vice President, Chief Financial Officer

Date: *6/29/2010*

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their respective duly authorized representatives as of the date first written above.

ADVISER:

PROSPECTOR PARTNERS, LLC

By: 

John D. Gillespie

Title: Managing Member

Date: June 29, 2010

CLIENT:

SYMETRA FINANCIAL CORPORATION

By:

Title:

Date:

SYMETRA LIFE INSURANCE COMPANY

By:

Title:

Date:

Schedule 1

TO INVESTMENT MANAGEMENT AGREEMENT, EFFECTIVE JULY 1, 2010 BETWEEN PROSPECTOR PARTNERS, L.L.C. AND SYMETRA FINANCIAL CORPORATION

Investment Guidelines

Investment Objective

The Adviser's objective is to achieve consistent positive returns and to maximize long-term total returns within prudent levels of risk through capital appreciation on a diversified portfolio of investments.

Performance Objectives

The Adviser will report to Symetra on a quarterly basis to review the Adviser's total investment performance. It is understood that there are likely to be short-term periods during which performance deviates from market indices. During such times, greater emphasis shall be placed on performance comparisons with investment managers employing similar styles. The overall performance of the Adviser's Investment Accounts will be measured by referencing broad equity market indices over a 3-year rolling period.

Guidelines

The Adviser must remain a registered adviser under the Investment Advisors Act of 1940. Whenever these guidelines contain a limitation expressed as a percentage of the portfolio assets, that percentage shall be measured solely with reference to the assets that are under the Adviser's control. Subject to these guidelines, the Adviser shall have full discretion, subject to Symetra's written notice of limitation constraints, to manage each Investment Account's assets.

- 1) The Adviser may not purchase securities on margin, sell short, or enter into derivative transactions in an Investment Account without the written consent of Symetra.
- 2) The Adviser may purchase Rule 144A securities provided such securities are judged by the Adviser to be liquid and do not in the aggregate exceed 20% of the market value of each Investment Account. The Adviser shall also be able to purchase securities if such securities are convertible into publicly traded securities.
- 3) At least 95% of each Investment Account will consist of securities of companies having a market capitalization of \$100 million or greater.
- 4) Each Investment Account may include domestic and non-domestic securities (common stocks, bonds, securities that are convertible to common stocks, preferred stocks, warrants and rights to subscribe to common stocks) that are listed on registered exchanges or actively traded in the over-the-counter market.

- 5) Issuers of securities located in countries other than the United States, including emerging market countries, shall not exceed 40% of the market value of each Investment Account.
- 6) In terms of diversification, investments shall be allocated with the intent to minimize the risk of large losses to each Investment Account. The maximum total investment in any one security shall be limited to 10% of an Investment Account at the time of purchase, and 25% of the market value of such Investment Account.
- 7) If the aggregate investment in an Investment Account of the equity securities of any one company exceeds 5% of that company's outstanding shares of all classes of stock of that issuer, the Adviser will notify Symetra.

Additional State Law Guidelines for Insurance Company Investment Accounts

- 1) Investment in preferred stock with voting rights plus common stock in the same issuer is limited to 15% of the issuer's outstanding shares having voting rights.
- 2) Investment is limited to 10% of the outstanding common stock of the same issuer.
- 3) No investment in the securities issued by an insolvent corporation is permitted. For purposes of this section 3, "insolvent corporation" is a corporation for which bankruptcy, receivership, insolvency, reorganization or other similar proceedings have been instituted by or against such corporation under any section or chapter of the United States Bankruptcy Code, as amended, or under any similar laws or statutes of the United States (or any state thereof).

Statement of Investment Policy Symetra Financial

Overview

This investment policy and its associated guidelines apply in aggregate to the investable general account and guaranteed separate account assets of Symetra Financial Corporation and its subsidiaries ("Symetra Financial"). These guidelines are established by the boards of directors, or their designated committees, of Symetra Financial companies. These guidelines should be used in conjunction with any specific supplementary guidelines established for each major business line, as well as any additional investment guidelines for certain separate account contracts (e.g. BOLI). Any deviations from these guidelines must be approved by the appropriate company's board of directors or by its designee and reported to the Symetra Financial Corporation board of directors quarterly.

Investment Objective

Support optimizing the economic value of the company across a broad range of interest rate and economic environments, while complying with applicable regulations, management initiatives and rating agency requirements.

The management of the portfolio will be primarily driven by asset/liability management, regulatory and general management considerations rather than total return benchmarks or other measures. However, to aid in the assessment of investment performance, the total return for the overall portfolio will be compared over multiple timeframes with relevant customized benchmarks having duration and yield characteristics consistent with the liabilities.

Duration/Convexity

Duration and convexity management are particularly important for liabilities with cash flows that can not be adjusted to reflect investment experience, but whose profitability is driven by the net interest spread ("fixed liabilities"). For example, fixed liabilities include structured settlements, income annuities, and fixed annuities with a set crediting rate for a specified period of time (not including annuities with regular credited rate resets). Many other Retirement Services and Life liabilities require less precise, although still fairly constrained, duration and convexity characteristics. Many of these other liabilities have regular credited rate resets, minimum credited rate guarantees as well as the option to withdraw the cash value at book value, with or without a fixed surrender charge.

For fixed liabilities (defined above) other than the very long duration structured settlements/income annuities, the effective asset duration should be within +/- 0.5 of the effective liability duration. For parallel yield curve shocks of +/- 1%, this difference should be no more than +/- 0.75. Larger parallel yield curve shocks will also be monitored for potential dislocations. Also, although there are currently no set guidelines,

Board of Directors' Approval:
SFC: 8/24/2004
SLIC and SNLIC: 12/6/2004
FSNLIC: 4/8/2005

partial asset and liability durations at significant points along the yield curve will be monitored to ensure a reasonable balance. For non-fixed Retirement Services and Life liabilities as well as for structured settlements and income annuities, the effective asset duration should be within +/- 1.0 of the target portfolio duration for each major liability group (determined in conjunction with each business line and summarized in a separate document). For parallel yield curve shocks of +/- 1%, this difference should be no more than +/- 1.25.

Unlike most of the Company's other liabilities, the products in the Group business line are driven by underwriting rather than investment results. Also, projected liability cash flows (including new premium) are positive in most plausible scenarios. Because of these attributes, additional flexibility around portfolio duration is reasonable. The effective asset duration should be within +/- 2.0 of the Group portfolio's target duration. As with other business lines, parallel and non-parallel yield curve shock analysis will be performed to test for possible dislocations.

The Corporate Surplus portfolio will not have pre-set duration targets. It will be driven by overall corporate requirements and any additional needs of the business lines.

Asset Allocation

Asset allocation is driven by the interest sensitive or guaranteed nature of many of the company's liabilities, regulatory and rating agency requirements as well as the need for reasonably consistent income and surplus growth. Given these considerations, the portfolio will consist mostly of a diversified mix of investment grade fixed income securities. As capital levels and rating agency considerations permit, relatively small allocations to equities, alternatives and high yield will be used to increase expected returns, diversify risks and better match very long duration liabilities (e.g. structured settlements). The following asset allocation limits are based on market values.

| <u>Asset Type</u> | <u>Maximum Allocation</u> | <u>Illustrative Long-term Target*</u> |
|-----------------------------|---------------------------|---------------------------------------|
| Fixed Income | 100% | 96% |
| Corporate Bonds | 70% | 55% |
| MBS/CMO | 20% | 10% |
| Asset Backed Securities | 15% | 12% |
| CMBS | 12% | 7% |
| Commercial Mortgages | 10% | 7% |
| Other Investment Grade | 10% | 2% |
| Below Investment Grade | 7% | 3% |
| Equity/Alternatives | 5% | 4% |
| Public/Private Equity | 3% | 1.5% |
| Hedge Funds | 3% | 1.5% |
| Real Estate | 2% | 0.5% |
| Other | 2% | 0.5% |
| Cash & short-term purchases | 2% | 0% |

* Illustrative long-term targets are based on the 2004 liability mix.

Liquidity

Cash on hand plus projected asset cash flows will be greater in aggregate than projected cash flows on current liabilities over the next 12 months. In addition, reasonable overall portfolio liquidity will be maintained to cover unanticipated liability cash flows and portfolio rebalancing needs. Specifically, liquid assets will comprise at least 50% of the Corporate Surplus and Structured Settlement/Income Annuity portfolios. All other portfolios will have at least 75% liquid assets (except BOLI separate accounts, which will have at least 90% liquid assets), recognizing the surrenderable nature of many of the other liabilities. Liquid assets are defined as government/agency, public investment grade fixed income and public equity securities which are sellable within 90 days for at least 95% of the most recently traded price.

Asset Quality

Fixed income investments will be focused on investment grade securities. The market value of BBB-rated fixed income securities (excluding commercial mortgage whole loans) will not exceed 40% of the aggregate market value of the portfolio. Similarly, the market value BB and B-rated (and lower) fixed income securities will not exceed 5% and 2%, respectively, of the aggregate market value of the portfolio. Purchases will not be made which either cause a quality limit to be violated or increase exposure in cases where the limit is already exceeded. In the event that quality downgrades cause a limit to be exceeded, the investment manager will use reasonable judgment in reducing exposure below the limit as market conditions permit.

Ratings used in these guidelines are from Moody's if available, then S&P, Fitch and the NAIC, in that order. If none of these ratings are available, an internal rating generally consistent with the methodology used by these major rating agencies will be used.

Concentration Limits

The following concentration limits deal with diversification by individual entity. As with the asset quality limits, purchases will not be made which either cause a concentration limit to be violated or increase exposure in cases where the limit is already exceeded. In the event that a quality downgrade causes a limit to be exceeded, the investment manager will use reasonable judgment in reducing exposure below the limit as market conditions permit.

Issuer – Fixed Income

Management will closely monitor firm-wide investment concentrations in individual issuers (U.S. Government and GSE securities excepted) to ensure adequate diversification. The limits below apply to the senior debt rating of the issuer, and are based on the aggregate market value of all fixed income securities from a single issuer as a percentage of the Company's Statutory Surplus plus Asset Valuation Reserve (AVR). In addition, any fixed income securities of an issuer rated below its senior debt rating ("junior securities") must also comply with the limits below, based on the ratings of the junior securities. Also, in the case of securitized investments backed by collateral pools, the credit rating of each individual security will be used in the table below, provided that the aggregate market value of fixed income securities backed by any single pool of

collateral does not exceed the AAA limit below. Ratings are defined as described in the Asset Quality section above.

| <u>Senior Debt Rating</u> | <u>Market Value as a % Surplus + AVR</u> | <u>Approximate % of Total Market Value *</u> |
|---------------------------|--|--|
| AAA | 12 % | 0.7% |
| AA | 10 % | 0.6% |
| A | 8 % | 0.5% |
| BBB | 6 % | 0.4% |
| BB | 3 % | 0.2% |
| < BB | 2 % | 0.1% |

* As of 12/2003

Issuer – Equity

Equity securities of a single issuer are limited by the table below, which varies by the senior debt rating class of the issuer.

| <u>Senior Debt Rating</u> | <u>Market Value as a % Surplus + AVR</u> | <u>Approximate % of Total Market Value *</u> |
|---------------------------|--|--|
| Investment Grade | 3 % | 0.2% |
| Below Inv. Grade | 1% | 0.1% |

* As of 12/2003

Insurer

The aggregate market value of securities insured by a single entity is limited to 4 times the fixed income issuer limit (above), based on the senior debt rating of the insurer. In the event that any of the insured securities would not have an investment grade rating on a stand-alone basis (without the insurance), the insurer's fixed income issuer limit (before multiplying by the factor of 4) will be reduced by the market value of such securities.

Servicer

The market value of non-US Government/GSE securities serviced by one servicing agent is limited to 25% of Statutory Surplus plus AVR.

Funds

Private fund investments such as private equity or hedge funds will be limited as follows.

| <u>Type</u> | <u>Market Value as a % Surplus + AVR</u> |
|----------------|--|
| Single Fund | 5% |
| Single Manager | 10% |

Other Diversification

Within the corporate bond portfolio, the market value of securities within a single major industry class will not exceed 20%. Although there are no pre-set limits, asset backed and commercial mortgage backed securities will be reasonably diversified by collateral type. Also, commercial mortgage exposure (CMBS and whole loan in aggregate) will be reasonably diversified by geographic region.

Currency

The currency denomination of the assets (incorporating any currency hedges) will be the same as the denomination of the associated liabilities, which in most if not all cases will be U.S. dollars. The Surplus portfolio will also be denominated in U.S. dollars. However, up to an aggregate market value of 1% of total assets may be denominated in un-hedged G-7 currencies.

Derivatives

The use of derivatives will be governed by the Derivatives Use Plan filed with, and approved by, any appropriate insurance regulatory agencies as well as the boards of directors of Symetra Financial companies.

Investment Managers

White Mountains Advisors LLC ("WMA") will be the primary investment manager for Symetra Financial and its affiliates. WMA may engage other investment managers to manage discrete portions of the Symetra Financial portfolios. However, WMA will be responsible for engaging, monitoring and terminating such managers, and for ensuring the overall portfolio is invested in accordance with this investment policy. All transactions will be promptly and accurately recorded as they occur.

SECURITIES LENDING PROGRAM

First Symetra National Life Insurance Company of New York, Symetra Life Insurance Company, and Symetra National Life Insurance Company (collectively "the Companies") have adopted this Securities Lending Program to supplement the Companies' Statement of Investment Policy. The Companies and their agents will adhere to the following procedures under the Program to govern their securities lending practices:

- (1) The Companies shall receive collateral having a fair value as of the transaction date at least equal to 102 percent (or as otherwise established by the Statements of Statutory Accounting Principles ("SSAP")) of the fair value of the loaned securities at that date. If at any time the fair value of the collateral is less than 100 percent of the fair value of the loaned securities, the counterparty shall be obligated to deliver additional collateral, the fair value of which, together with the fair value of all collateral then held in connection with the transaction at least equals 102 percent (or as otherwise established by the SSAP) of the fair value of the loaned securities. The collateral may consist of cash, letters of credit from authorized banks, or securities issued or guaranteed by the United States government or one of its agencies or instrumentalities, or any combination thereof. The collateral will be received by the Companies' custodian concurrently with delivery of the loaned securities and kept in a segregated account. The Companies will monitor collateral levels via reports provided by the custodian on a monthly basis. Any non-compliance issues will be elevated to the Chief Financial Officer or his designee and to the custodian for corrective action.
- (2) Loans may be made only to reputable borrowers that, in the Companies' opinion, are of sound financial condition. The custodian will maintain a list of approved borrowers and will monitor the creditworthiness of such approved borrowers on an on-going basis. The Companies will obtain an updated borrower list on a quarterly basis. Any deletions required will be communicated to the custodian using the agreed upon methodology as outlined in the agreement.
- (3) No loan of securities may be made to any borrower if, within the meaning of the Insurance Company Holding Act, such borrower would be an affiliated person of the Companies.
- (4) Loans must be callable at any time. If a loan is terminated by the Companies, the borrower must return the loaned securities within five business days. If the borrower fails to deliver the loaned securities within five days after receipt of notice of termination, the Companies may use the collateral to replace the securities and hold the borrower liable for the excess of replacement cost exceeding the collateral.
- (5) The Companies may pay fees to a lending agent or other intermediary for the following: (a) reasonable custodial fees; and (b) fees for the arranging of portfolio loans, provided that the Companies have determined in each case that the fee is reasonable and based solely on the services rendered. In addition, the Companies must receive a reasonable fee for lending their securities.
- (6) Loans of securities must be made pursuant to written contracts which have been approved and executed on behalf of each Company by a duly authorized officer and which are designed to assure that these procedures will be complied with in connection with such loans. Information concerning each loan will be provided by the custodian upon request.
- (7) The Companies' board will periodically review lending activities affecting the Companies' portfolios.

Board of Directors' Approval:
FSNLICNY: 3/16/2006
SLIC: 12/06/2005
SNLIC: 12/06/2005

**ADDENDUM
TO
SYMETRA FINANCIAL CORPORATION
STATEMENT OF INVESTMENT POLICY**

DERIVATIVES USE PLAN

Adopted by the Board of Directors on November 14, 2006

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I. POLICY

The purpose of this Plan is to set forth the guidelines and parameters for the use of derivative transactions by Symetra Financial Corporation, a state of Delaware-domiciled corporation, and each of its subsidiaries identified on Exhibit B hereto (each a "Company" or collectively the "Companies"). As contemplated in this Plan, the Companies' use of derivative transactions shall be in conformance with applicable law and with the Companies' general philosophy of managing their investments and overall balance sheet in a prudent and conservative manner, with the goals of preserving the capital and financial strength of the Companies, while seeking adequate returns on their investments and operations. In that regard, the Companies' use of derivative transactions under this Plan is expected to help manage the Companies' investments. Derivatives, however, will not be used for speculative purposes.

The Companies recognize that, while derivative transactions are useful risk and portfolio management tools, as with any investment practice, the use of derivative transactions exposes the Companies to certain risks. Nevertheless, the risks associated with derivative transactions are not inherently different than those present in other, more traditional forms of investments, and, with proper use and careful management, such derivative transactions can be utilized safely, as part of the overall investment and risk management strategy of the Companies. Therefore, in order to ensure the proper use of derivative transactions and to mitigate the risks associated with such use, this Plan establishes internal controls and reporting with respect to the use of derivative transactions.

II. DERIVATIVE INSTRUMENTS AND STRATEGIES

A. Derivative Instrument Definitions.

Derivative instruments and transactions can be structured in numerous forms with various characteristics. For the purposes of this Plan, the Companies recognize the two following industry definitions of "derivative instrument":

1. The definition according to Generally Accepted Accounting Principles (GAAP):¹
A financial instrument or other contract with all three of the following characteristics:
 - It has (1) one or more underlyings and (2) one or more notional amounts or payment provisions or both.
 - It requires no initial net investment or an initial net investment that is smaller than would be required for other types of contracts that would be expected to have a similar response to changes in market factors.

¹ FASB statement No. 133 "Accounting for Derivative Instruments and Hedging Activities."

- Its terms require or permit net settlement, it can readily be settled net by a means outside the contract, or it provides for delivery of an asset that puts the recipient in a position not substantially different from net settlement.
2. The regulatory definition:²

An agreement, option, instrument or a series or combination thereof:

- (a) To make or take delivery of, or assume or relinquish, a specified amount of one or more underlying interests, or to make a cash settlement in lieu thereof; or
- (b) That has a price, performance, value or cash flow based primarily upon the actual or expected price, level, performance, value or cash flow of one or more underlying interests.

Examples of derivative instruments include, but are not limited to, options, warrants used in a hedging transaction and not attached to another financial instrument, caps, floors, collars, swaps, swaptions, forwards, futures and other agreements, options or instruments substantially similar thereto or any series or combination thereof. The following are regulatory definitions³ with respect to each of the foregoing instruments:

“Cap” means an agreement obligating the seller to make payments to the buyer with each payment based on the amount by which a reference price or level or the performance or value of one or more underlying interests exceeds a predetermined number, sometimes called the strike rate or strike price.

“Collar” means an agreement to receive payments as the buyer of an option, cap or floor and to make payments as the seller of a different option, cap or floor.

“Floor” means an agreement obligating the seller to make payments to the buyer in which each payment is based on the amount by which a predetermined number, sometimes called the floor rate or price, exceeds a reference price, a level, or the performance or value of one or more underlying interests.

“Forward” means an agreement (other than a future) to make or take delivery of, or effect a cash settlement based on the actual or expected price, level, performance or value of, one or more underlying interests, but shall not mean or include spot transactions effected within customary settlement periods, when-issued purchases, or other similar cash market transactions.

² Based on the NAIC's Derivative Instruments Model Regulation and Statements of Statutory Accounting Principals (“SSAPs”).

³ These definitions are based in whole or in part on definitions found in Washington state insurance laws as may be amended from time to time.

"Future" means an agreement, traded on a qualified exchange or qualified foreign exchange, to make or take delivery of, or effect a cash settlement based on the actual or expected price, level, performance or value of, one or more underlying interests.

"Option" means an agreement giving the buyer the right to buy or receive (a "call option"), sell or deliver (a "put option"), enter into, extend or terminate or effect a cash settlement based on the actual or expected price, level, performance or value of one or more underlying interests.

"Swap" means an agreement to exchange or to net payments at one or more times based on the actual or expected price, level, performance or value of one or more underlying interests.

"Swaption" means an option to enter into a Swap.

"Warrant" means an instrument that gives the holder the right to purchase an underlying financial instrument at a given price and time or at a series of prices and times outlined in the warrant agreement. Warrants may be issued alone or in connection with the sale of other securities, for example, as part of a merger or recapitalization agreement, or to facilitate divestiture of the securities of another business entity.

B. Exchange Traded versus Over-the-Counter Transactions.

Derivative transactions may be traded through an exchange or through the more specialized over-the-counter ("OTC") market. While derivative exchanges provide ease of access to a ready market for derivative transactions, a higher degree of liquidity and the mitigation or elimination of counterparty credit risk, exchanges require uniformity of terms among transactions and therefore, may not always accomplish the underlying investment objective. In contrast, while OTC transactions are generally less liquid and expose the parties to counterparty credit risk, they allow counterparties to structure more customized transactions to accomplish more closely the objective for entering into the derivative transaction. In addition, the wide use of standardized documentation, such as the forms of Master Agreements published by the International Swaps and Derivatives Association, Inc. ("ISDA"), has created a certain degree of uniformity and standardization in OTC transactions. The Investment Manager shall evaluate the characteristics of an exchange-traded versus OTC derivative transaction, including underlying counterparty credit exposure, before engaging in a derivative transaction.

As a general rule, the Investment Manager will emphasize the use of exchange-traded derivatives and reasonably liquid OTC derivatives, while taking advantage of less liquid, customized OTC derivatives only when appropriate.

C. Strategies (All life insurance company strategies will conform to applicable state statutes).

Derivative instruments can be used in conjunction with various strategies to affect a desired purpose or objective; however, as a general rule, derivative transactions are primarily focused on three basic strategies: hedging (including replication), income generation, and speculation. The Companies will be focused on hedging (including replication) strategies to

manage exposure to changes in interest rates, spreads, equity returns, currencies, and credit quality and on income generation.

1. *Derivative Transactions for Hedging Purposes*

Derivative transactions are widely used as a tool to reduce and hedge against risks faced by companies in the marketplace. In that regard, the use of hedging transactions is an important and essential part of the Companies' overall risk management program.

For purposes of this Plan, the definition of "hedging transaction" is a derivative transaction which is entered into and maintained to reduce:

- (a) The risk of a change in the value, yield, price, cash flow, or quantity of assets or liabilities that the insurer has acquired or incurred or anticipates acquiring or incurring; or
- (b) The currency exchange rate risk or the degree of exposure as to assets or liabilities that the insurer has acquired or incurred or anticipates acquiring or incurring.

The Companies' use of derivative transactions for hedging purposes may also include replication transactions. For purposes of this Plan, the definition of "replication transaction" is "a derivative transaction or combination of derivative transactions effected either separately or in conjunction with cash market investments included in the insurer's investment portfolio in order to replicate the investment characteristic of another authorized transaction, investment or instrument and/or operate as a substitute for cash market transactions." In certain circumstances, replication transactions can provide a more cost-effective means of investing in a given asset or group of assets, in effect, by synthetically replicating the characteristics and performance of the assets. Replication transactions can also be used to replicate certain desired, rather than all, characteristics of an asset. The Investment Manager shall structure the Companies' replication transactions so that the potential exposure with respect to a replication transaction is directly related to the risks associated with the asset characteristics being replicated.

Given the nature and purpose of a hedging transaction, the potential exposure associated with such transactions is generally limited. If a hedging transaction is structured properly as an effective hedge, any losses realized with respect to the asset or activity that was the subject of the hedge should be matched or offset, entirely or in part, by gains in the transaction. In that regard, a crucial element of the Companies maintaining a successful hedging program using derivative transactions is the Companies' implementation of appropriate procedures and guidelines to evaluate the effectiveness or efficacy of specific hedging transactions (see Section IV G Accounting and Financial Reporting for specific guidance).

2. *Income Generation*

Income generation transactions allow the Companies to earn income through the use of derivative transactions. However, income generation for the purposes of this Plan will only be permitted through the sale of call options on securities, provided that the Companies

hold, or can immediately acquire through the exercise of options, warrants or conversion rights already owned during the entire period the option is outstanding (i.e., covered options).

D. Duty to Consider Risks Inherent in Derivative Transactions.

As with any investment, the use of derivatives entails certain risks. At a minimum, the following significant risks shall be considered by the Investment Manager prior to engaging in a particular derivative transaction.

1. *Basis Risk*

The effectiveness of any hedging strategy is dependent upon the matching of the risks being hedged with the instruments and strategies used to mitigate such risks, creating a corresponding offsetting position. "Basis risk" is the risk of loss resulting from a hedging transaction that is imperfectly matched or correlated to the subject risk exposure. The Investment Manager will continuously monitor the Companies' hedging transactions to ensure that they continue to be effective. Should the effectiveness of the hedge position shift significantly the Investment Manager will seek to either modify or terminate the transaction. The foregoing concept can also apply to replication transactions, where basis risk can exist between the subject derivative transaction and the asset/assets intended to be replicated.

2. *Counterparty Exposure Risk*

Counterparty exposure risk relates to the risk of loss resulting from a default by a counterparty of its obligations under a derivative transaction. Where a derivative transaction is entered into through a qualified exchange, the counterparty exposure risk is limited by the financial stability of the exchange and its clearing system. Conversely, if a derivative transaction is an OTC transaction, the counterparty exposure amount will depend largely upon the creditworthiness of the counterparty to the transaction.

With respect to OTC transactions and transactions entered through non-qualified exchanges, the Investment Manager shall seek to mitigate counterparty exposure by (i) evaluating and monitoring the financial qualifications of counterparties to ensure that they meet the counterparty requirements set forth in Section IV.A of this Plan, and (ii) to the extent appropriate, requiring counterparties to provide the Companies with sufficient collateral security and other financial assurances, such as the posting of collateral or letters of credit. Specifically, the Investment Manager shall request collateral in the event that total net exposure to such counterparty exceeds an amount based on the following schedule:

- \$25 million for a counterparty with a AAA rating
- \$20 million for a counterparty with a AA rating
- \$15 million for a counterparty with a A rating
- \$5 million for a counterparty with a BBB+ rating
- \$2.5 million for a counterparty with a BBB rating

- \$0 for BBB- and lower

In the event that collateral is required, the Investment Manager will request either a letter of credit from an acceptable bank or collateral consisting of cash or high quality securities for at least 100% of the amount of net exposure exceeding the amount outlined above.

3. *Liquidity Risk*

As with any form of investment, derivative instruments pose a certain degree of liquidity risk. Although exchange-traded derivatives are generally considered liquid instruments, certain specialized or customized OTC derivatives may be relatively illiquid. The liquidity of a derivative instrument also generally decreases during volatile market conditions, with the liquidity of certain investments, such as OTC derivatives, being affected more severely during such volatile market conditions, particularly when one wants to sell or close a position. While this is a risk in the market, it can also be exploited as an opportunity.

4. *Systemic Risk*

Systemic risk is the risk that a major failure or disruption in one institution or segment of the market will affect other institutions, leading ultimately to a breakdown of the financial system. The use of derivative transactions and the potential of failures within the derivatives markets can contribute to this overall systemic risk. Given the continued and increasing oversight of the derivatives markets, this risk is fairly remote.

5. *Operational Risk*

The use of derivative instruments is also subject to the risk of human error, mismanagement and system and control failures. To minimize its operational risks, the Companies and the Investment Manager shall have in force at all times the internal control procedures set forth in Section IV hereof, which provide multiple levels of oversight, appropriate checks and balances, and periodic audits and reviews of specific transactions and the system. Furthermore, the Companies and the Investment Manager shall utilize the knowledge of suitably qualified individuals who have knowledge and experience in the use of derivative instruments.

E. Risk/Exposure Measurement.

In order to quantify the various types of risks associated with derivative transactions, the Investment Manager shall apply industry-accepted models to every applicable derivative transaction. In that regard, the Investment Manager is authorized to use the models available through systems such as Bloomberg, Derivative Solutions or other similar industry-accepted models.

III. LIMITATIONS AND PARAMETERS

A. Quantitative and Other Limitations.

The Companies recognize the importance of diversification and credit quality. Unless otherwise provided for under the applicable law, the Companies' limits for different derivative strategies and instruments are as follows:

1. ***Limitations Relating to Strategies and Instruments (to be applied on a per-Company basis)***

In addition to the limitations relating to counterparties and the other limitations set forth in subsection 2 below, the Companies and the Investment Manager shall comply with the limitations set forth in subsections 1(a)-(c) below specifically applicable to the strategies of hedging, replication and income generation. In addition, while the Companies do not have any guidelines limiting the maximum allowed term for derivative transactions, to the extent possible, the Investment Manager generally will have the term of the derivative transaction be less than or equal to the anticipated duration of the risk.

(a) Hedging.

The Companies may engage in hedging transactions, provided that the hedge continues to be effective according to the Companies' evaluation procedures (which will incorporate certain derivative related information provided by the Investment Manager) and each Company complies with the following quantitative limitations:

- The aggregate financial statement value of options, swaptions, caps, floors and warrants not attached to another financial instrument that are *purchased* by a Company and used in hedging transactions shall not exceed 7.5% of the market value of such Company's invested assets (admitted assets for life insurance companies).
- The aggregate financial statement value of options, swaptions, caps and floors *written* by a Company for hedging transactions shall not exceed 3% of the market value of the such Company's invested assets (admitted assets for life insurance companies).
- The aggregate potential exposure of collars, swaps, swaptions, forwards and futures used in hedging transactions shall not exceed 6.5% of a Company's invested assets (admitted assets for life insurance companies).

(b) Replication.

The Companies may engage in replication transactions provided that the Companies would otherwise be authorized to invest their funds in the assets being replicated, the replication continues to be effective and each Company complies with the following quantitative limitations:

- A Company shall aggregate all replicated investment positions with their direct investments as if such Company had invested in the replicated asset directly in determining its compliance with applicable quantitative limitations.
- The aggregate financial statement value of assets being replicated shall not exceed 10% of the market value of a Company's invested assets (admitted assets for life insurance companies).

(c) **Income Generation.**

A Company may engage in income generation transactions provided that such transactions may only involve the sale of call options on securities that such Company holds (or can immediately acquire through the exercise of options, warrants or conversion rights already owned) during the entire period the option is outstanding (i.e., covered options), and each Company complies with the following quantitative limitations:

- The aggregate financial statement value of options *written* by a Company for income generation transactions shall not exceed 1% of the market value of such Company's invested assets (admitted assets for life insurance companies).

2. ***Limitations Relating to Counterparties***

The Investment Manager shall monitor the credit quality of counterparties and regularly analyze and review the Companies' counterparty exposure. The Investment Manager shall use a mark-to-market value to determine a Company's counterparty exposure, net of any collateral held. The Investment Manager will also analyze "expected values" to determine total exposure. Furthermore, a Company shall limit its individual counterparty exposure under one or more derivative transactions to (a) 1% of its market value of invested assets (admitted assets for life insurance companies) for any single counterparty rated less than AA-/Aa3 and (b) 3% of its market value of invested assets for counterparties AA-/Aa3 or better. In addition, a Company's counterparty exposure shall be deemed to be an obligation of the institution to which such Company is exposed to credit risk and shall be included in determining compliance with any single or quantitative limitation applicable to such Company's investments.

B. **Documentation of OTC Derivative Transactions.**

All OTC derivative transactions entered into by the Companies shall be documented on an appropriate form of the ISDA Master Agreement ("Master Agreement"). Each transaction shall be based upon the Master Agreement and include negotiated schedules. Prior to the execution of any OTC derivative transaction, a Master Agreement between the Company(ies) and the subject counterparty must be in place. Each derivative transaction shall be documented on a standard confirmation which references the Master Agreement between the Company(ies) and the counterparty.

IV. OVERSIGHT, INTERNAL CONTROL PROCEDURES AND REPORTING

A. Delegation of Responsibility.

The ultimate responsibility for the use of derivative transactions is vested in each Company's Board of Directors ("Board"). In discharging its duties with regard to derivative transactions, each Board shall act in good faith with that degree of care that an ordinary, prudent person in like circumstances would use under similar circumstances. This Plan may be amended only by the Board.

The Board may delegate the day-to-day oversight regarding the Company's use of derivative instruments as outlined in this Plan to an Investment Manager. The Board shall choose an Investment Manager that possesses such expertise and experience necessary to appropriately manage the day-to-day derivative operations in a prudent manner, in compliance with this Plan.

B. Day-to-Day Responsibility – Investment Manager.

All oversight of day-to-day decisions regarding a Company's use of derivative instruments will be vested in the Investment Manager. In overseeing the day-to-day derivative activities of the Companies, the Investment Manager will comply with all the terms of this Plan and the investment policy established by each Company's Board. In addition, the Investment Manager will provide certain trade date documentation and derivative modeling results (described below) to help support each Company's accounting and reporting policies and responsibilities related to derivative investments, both on a GAAP and Statutory accounting basis.

1. *Review and Documentation of Derivative Transactions*

A member of the Investment Manager authorized to initiate derivative transactions will review each potential derivative transaction entered into by the Companies in accordance with the terms of this Plan.

The Investment Manager shall prepare reports pursuant to Section D hereof for the purpose of facilitating the Companies' review of such derivative transactions.

C. Internal Control Procedures – Process for Approval and Monitoring of Individual Transactions.

The Investment Manager will maintain a list of personnel authorized to initiate derivative transactions. In examining whether a Company should engage in a particular derivative transaction, an authorized member of the Investment Manager will consider (i) the guidelines set forth herein, (ii) the intended purpose of the transaction, (iii) the incremental risk to the Company caused by engaging in such derivative transaction, and (iv) alternative mechanisms for achieving the same purpose. All proposed derivative transactions will be documented on the trade date on a Derivative Transaction Control Sheet ("Control Sheet"), substantially in the form attached hereto as Exhibit A. The Control Sheet may be updated from time to time to reflect changing information requirements from regulators or as best practices

evolve. A Control Sheet will not be deemed complete unless a draft of the underlying confirmation is attached thereto and the Control Sheet contains the following information:

- type of derivative instrument(s) to be used;
- type of strategy to be undertaken;
- underlying investment position or other balance sheet or income statement item to which the derivative transaction relates;
- description of the transaction, its purpose and its intended effect, including a precise identification of the risks being hedged or replicated, if applicable;
- identity of the counterparty or, with respect to exchange-traded transactions, the identity of the exchange and the name of the firm that handled the trade;
- notional amount of the transaction;
- consideration for the transaction;
- any additional collateral or other credit support taken or provided; and
- Investment Manager's recommendation for the most appropriate method for assessing effectiveness based on acceptable choices provided by a Company in the event hedge accounting is to be used (final determination to be made by a Company for accounting/tax purposes).

On the date of a derivative transaction, two members of the Investment Manager must sign the Control Sheet, one of whom is authorized by the Investment Manager to initiate derivative transactions and the other of whom is in the Operations area responsible for settling all derivative transactions. Prior to the end of the day on which a derivative transaction has occurred, the Investment Manager will ascertain that:

- the Control Sheet is complete;
- the derivative transaction complies with this Plan, including a Company's established quantitative and qualitative limits/parameters;
- the transaction is reasonably expected to perform as intended, as demonstrated through stress testing and other techniques designed to vary market performance and conditions as appropriate;

- the counterparty is included on the Investment Manager's list of approved derivative counterparties for such Company;
- Such Company has received a copy of the completed Control Sheet so that it can complete any additional required hedge designation documentation, including the anticipated accounting and tax treatment for such derivative transactions. In the event that the transaction is not of the type where standard language has been provided to the Investment Manager by such Company, a minimum of 1 day prior notice must be given to such Company to allow adequate time to complete the derivative documentation in a timely manner. In all other cases the Control Sheet will be provided to such Company by noon on the transaction date.

The Investment Manager will be responsible for ensuring the proper monitoring of the performance of each derivative transaction during its duration to make certain that each derivative transaction continues to perform as originally intended and each such transaction remains in compliance with (i) all applicable laws and regulations, (ii) the terms of this Plan, and (iii) the underlying transaction documentation. A derivatives committee established by the Investment Manager will review the performance, potential risk and overall compliance of each derivative transaction on at least a monthly basis. Committee meeting minutes will be kept with copies provided to the Investment Manager and to the Companies. Any derivative transaction that is no longer performing in a manner consistent with its original purpose or is no longer in compliance with the aforementioned laws, regulations, Plan or underlying documentation will be terminated as soon as practicable.

The Investment Manager will be responsible for reviewing and approving its summary report information generated with respect to all derivative transactions. The Investment Manager will ensure information provided in such reports agrees with supporting documentation and systems backup information used in its risk measurement. The Investment Manager will be responsible for ensuring and assessing the effectiveness of internal controls over any models or system software used in the derivative transactions.

The Investment Manager will be responsible for providing certain information relating to derivative transactions necessary for the Companies' assessment of the effectiveness of internal controls over investment accounting and financial reporting (see Section IV.G Accounting and Financial Reporting).

Every quarter, the Investment Manager will be responsible to report any internal control weaknesses or significant deficiencies as they relate to internal controls over the derivative transaction process. The Investment Manager shall prepare and deliver to the Companies a detailed plan that is reasonably acceptable to the Companies for promptly correcting all such deficiencies and exceptions ("*Corrective Plan*"). The Investment Manager shall deliver such Corrective Plan to the Companies promptly following the identification of the internal control weakness.

In the event that either the Companies or Investment Manager identify any weaknesses in the internal controls and procedures involving any material aspect of its respective derivative responsibilities, such weaknesses will be promptly communicated to the other party and no incremental derivative exposure effected by such weaknesses will be added until both the Investment Manager and the Companies are satisfied that the weaknesses have been sufficiently addressed.

D. Management Oversight of Derivatives Program.

In order to enable the Companies and the Investment Manager to meet the Companies' management and oversight standards as set forth in this Plan or required by law, the Companies and the Investment Manager shall be responsible, through their designated personnel, for generating a detailed Derivatives Report containing information pertaining to a Company's derivative activities during the prior quarter or other relevant period. The Report will contain a summary of each derivative transaction and a copy of each Control Sheet with respect to each derivative transaction effected during the relevant period. In addition, the Report will contain the following information:

- outstanding derivative positions and unrealized gains or losses on such positions, if any;
- derivative transactions opened and/or closed during the quarter and realized gains and losses on such transactions, if any;
- a performance review of the derivative transactions;
- an evaluation of the risks and benefits of the derivative transactions, including whether a derivative transaction entered into for hedging purposes continues to be an effective hedging tool;
- an assessment of future or "potential" risk exposure;
- a review of all counterparty exposure amounts outstanding;
- a valuation of the derivative transactions, including a mechanism for compensating for any lack of independence in valuing trading positions;
- any other reports, documentation or analysis deemed necessary by a Company or the Investment Manager to ascertain whether all derivative transactions have been made in accordance with the delegations, standards, limitations and objectives contained in this Plan.

E. Records and Documentation.

The Investment Manager will ensure that original documentation is maintained with respect to each derivative transaction prior to and following the termination of each such transaction, in accordance with a Company's record retention policies and procedures. All reports and documentation maintained by a Company regarding its derivative transactions will be available for (i) review by its Board, and (ii) independent audit and regulatory examination. The Investment Manager, under Company direction, will use such records to prepare and maintain summary report information with respect to all derivative transactions, in sufficient form and detail to allow the preparation of the Companies' Annual and Quarterly Statements in compliance with applicable laws and regulations.

F. Separation of Trading and Settlement Functions.

The Investment Manager will maintain a clear separation of the trading and settlement functions as another control measure. These two functions will be performed by separate areas and personnel.

G. Accounting and Financial Reporting.

The Companies will have responsibility for Accounting and Financial Reporting relating to derivatives. The Companies will provide the Investment Manager with accounting and tax wording for some of the more probable types of derivatives that will be used. This information will be included in the Control Sheet. The Investment Manager will provide certain derivative related information to the Companies to support these activities as outlined below:

- The Investment Manager will prepare and provide the Companies, on the trade date, with copies of the completed Control Sheet (see Exhibit A) relating to each derivative transaction. The Companies will use the information on the Control Sheet as part of their hedge designation documentation. The designation documentation supporting the hedge must be formal, be contemporaneous (i.e., prepared at inception of the hedge), identify the hedged item, the hedging instrument, the nature of the hedging relationship (e.g. fair value, cash flow, net investment), the Companies' overall risk management objectives and strategy for undertaking the hedge. The Investment Manager will suggest the most appropriate method for determining how hedge effectiveness will be assessed. As part of the Financial Reporting designated documentation, a statement must be included that identifies the hedging transaction for tax purposes. This will be provided by the Companies.
- The designation documentation must include support provided by the Investment Manager (e.g., correlation statistics such as r-squared using statistical analysis or observations of how effectively the hedging instrument achieved the dollar offset with the hedged item in the income statement) for why the hedge is expected to be "highly effective" at inception and on a go-forward basis.

- To be determined to be a “highly effective” hedging transaction, such transaction must be measured on a dollar offset approach and recorded within an 80-125% effectiveness range.
- The designation documentation must define and document the method the Companies (provided by the Companies) will use to assess the hedge effectiveness for both prospective considerations and retrospective considerations: either a dollar-offset approach or a regression or other statistical analysis approach. However, when it comes to actually recording the amount of ineffectiveness during a period, the dollar-offset method must be used.
- Investment Manager will provide the Companies with the data supporting the amount of ineffectiveness and the ongoing assessment.
- The Companies will prepare a summary similar to Exhibit C summarizing the measurement of hedge effectiveness / ineffectiveness on quarterly basis. See Exhibit C.
- Investment Manager will provide the Companies, when reasonably requested, a quantitative and sensitivity analysis of the hedge transaction and market risk (equity and interest risks) as required in Management Discussion and Analysis.

EXHIBIT A

**SAMPLE DERIVATIVE TRANSACTION
CONTROL SHEET**

Attached Documentation

Attach a copy of the draft confirmation (attach final as soon as it is available) of the derivative transaction to this Control Sheet. Also attach any documentation specific to this transaction that is in addition to the Master Agreement, schedule thereto and any credit support agreement.

Description of the Transaction

Please provide an appropriate answer to the information requested below regarding the subject derivative transaction

1. Describe the derivative transaction, including the purpose (i.e., strategy) for engaging in the derivative transaction and the intended effect. _____

- a. Describe the underlying investment position or other balance sheet or income statement item to which the derivative transaction relates. _____

- b. If the derivative transaction is entered into for hedging purposes, describe the precise risk being hedged or replicated. _____

2. Indicate the type of derivative instrument(s) used. _____

3. Indicate the notional amount of the derivative transaction. _____

4. Indicate the consideration paid/received in connection with the derivative transaction. _____

5. Identify the counterparty to the derivative transaction, or, if the derivative instrument is exchange traded, identify the exchange and the brokerage firm that handled the trade. _____

6. Describe any collateral or credit support given or received in relation to the derivative transaction that is in addition to collateral required by the standard CSA.

7. Investment Manager's recommendation for most appropriate method for assessing hedge effectiveness from Companies' list of approved methods (Companies will make the final determination of the method to be used for accounting/tax purposes)

Performance of the Derivative Transaction

Attach any analysis or testing performed regarding the anticipated performance of the derivative transaction.

Investment Manager Approval

The undersigned (i) certify that, to the best of his/her knowledge, all of the statements provided herein are true and correct in all material respects, (ii) certifies that the derivative transaction is within the undersigned's authority level to approve, and (iii) approves the derivative transaction described herein and set forth in the documentation attached hereto.

Authorized Trader's signature

Member of Operations/Compliance Area

EXHIBIT B

LIST OF COMPANIES

DATE ADOPTED BY THE BOARD

Symetra Life Insurance Company

December 5, 2006

EXHIBIT C

SAMPLE EFFECTIVENESS SUMMARY

| | | | | |
|--|----|----|----|----|
| Company reporting date: (Effectiveness must be assessed whenever financial statements or earnings are reported, but at least every 3 months) | | | | |
| Company Calculation of: | | | | |
| Hedged Item Fair Value | \$ | \$ | \$ | \$ |
| Hedging Instrument Fair Value | \$ | \$ | \$ | \$ |
| Retrospective Effectiveness | | | | |
| Prospective Effectiveness | | | | |
| For cash flow hedge of a forecasted transaction, is the hedged item still probable of occurring? (yes or no) | | | | |
| Company performed and documented assessment of hedge effectiveness in accordance with the method defined in the hedge designation documentation? (yes or no) | | | | |
| Company concluded that hedge meets criteria for hedge accounting? (yes or no) | | | | |
| Comments/working paper reference | | | | |

Supplementary Investment Guidelines
Symetra Life Insurance Company
Adopted by the Board of Directors on December 6, 2005, as last amended 1/20/2009

This supplement to the Company's Statement of Investment Policy is to promote compliance with statutory requirements for purchases or acquisitions of investments by life insurers domiciled in the state of Washington and to incorporate other Company investment policies as may be approved from time to time by the Company's Board of Directors. Statutory restrictions or investment limits are in addition to any restrictions or limitations already required under the Company's general investment policies.

Chart of Statutory Investment Limits:

The Chart is intended as a summary only of the laws currently in force and does not obviate the Company's obligation to comply fully with all applicable laws at the time of each transaction.

| Security | Requirement/Restriction | RCW |
|---|---|--|
| General Qualifications: Interest bearing or accruing or dividend or income paying securities that are not in default and not priced above market value. | 100% of securities purchased or acquired must satisfy these requirements. (Limited exceptions may apply.) | 48.13.020 |
| One Entity: Any combination of investments in or loans upon the security of the obligations, property, and securities of any one person, institution, or municipal corporation. | Limited to 4% of assets without prior consent from OIC. (Limit does not apply to general obligations of the U.S. government or U.S. state governments.) | 48.13.030(1) (See 48.13.273 for limits on medium and lower grade obligations.) |
| Depository Institutions: Voting securities of a depository institution or any company which controls a depository institution. | Limited to 5% of admitted assets without prior consent from OIC. | 48.13.030(2) |
| Public Obligations: Bonds or other evidences of debt, not in default as to principal or interest, that are obligations issued, assumed or guaranteed by the U.S. or by any U.S. state or by any U.S. territory or possession, or by the District of Columbia or by any county, city, town, village, municipality or district therein or by any political subdivision thereof or by any civil division or public instrumentality of one or more of the foregoing. | Funds may be invested in public obligations payable (1) from taxes levied or required to be levied upon all taxable property or all taxable income within the jurisdiction of such governmental unit or, (2) from adequate special revenues, but <u>not</u> including any obligation payable solely out of special assessments on properties benefited by local improvements unless adequate security is evidenced. | 48.13.040 |
| Corporate Obligations: Obligations issued, assumed, or guaranteed by any solvent institution created or existing under the laws of the U.S. or of any state, district or territory thereof, and are qualified under any of the following: (1) Obligations which are secured by adequate collateral security and bear fixed interest. (2) Fixed interest bearing obligations. (3) Adjustment, income or other contingent interest obligations. | Section not applicable to mortgage related investments authorized under RCW 48.13.110. In determining the adequacy of collateral security, not more than 1/3 of the total value of such required collateral shall consist of stock other than stock meeting the requirements of RCW 48.13.080 (preferred or guaranteed stocks). Eligible corporate obligations are subject to issuer earnings requirements under RCW 48.13.050(1), (2) or (3).. | 48.13.050 See limits under 48.13.273, for medium and lower grade obligations. See 48.13.060 and .070 for definition of "net earnings" and application of net earnings test on securities of merged/reorganized institutions. |
| Preferred or Guaranteed Stocks: Qualified preferred or guaranteed stocks or shares (other than common stock) of solvent U.S. institutions. Stocks or shares are qualified if they meet the requirements of RCW 48.13.080(1)(a) for preferred stocks, or (b) for guaranteed stocks. In addition, as of the date of acquisition, all of the prior obligations and prior preferred stocks of the institution must be eligible investments. | Limited to 10% of assets. Institutions must satisfy net earnings requirements for preferred stock and RCW 48.13.050 for guaranteed stock. Subject to limitations of RCW 48.13.030 (single issuer), investment in preferred stock with voting rights plus common stock in same issuer (other than investment in certain subsidiaries of the insurer) is limited to 15% of issuer's outstanding shares having voting rights. | 48.13.080 |

| Security | Requirement/Restriction | RCW |
|---|---|--|
| <p>Trustees' or Receivers' Obligations: Certificates, notes or other obligations issued by trustees or receivers of U.S. institutions which, or the assets of which, are court administered and which are adequately secured as to principal and interest.</p> | <p>Limited to 2% of assets.</p> | <p>48.13.090</p> |
| <p>Equipment Trust Certificates: Equipment trust obligations or certificates which are adequately secured, or in other adequately secured instruments evidencing an interest in transportation equipment wholly or in part within the U.S. and the right to receive determined portions of rental, purchase or other fixed obligatory payments for the use or purchase of such transportation equipment.</p> | <p>Limited to 10% of assets.</p> | <p>48.13.100</p> |
| <p>Mortgages, Deeds of Trust, Mortgage Bonds, Notes, Contracts: (1)(a) Bonds or evidences of debt which are secured by first mortgages or deeds of trust on improved unencumbered real property located in the U.S.; (1)(b) chattel mortgages in connection therewith; (1)(c) the equity of the seller of any such property in the contract for a deed, covering the entire balance due on a bona fide sale of such property. (2) Money mortgages or like securities received upon the sale or exchange of real property acquired pursuant to RCW 48.13.160. (3) Bonds or notes secured by mortgage or trust deed guaranteed or insured by the FHA. (4) Bonds or notes secured by mortgage or trust deed guaranteed or insured as to principal in whole or in part by the VA. (5) Evidences of debt secured by first mortgages or deeds of trust upon leasehold estates, except agricultural leaseholds executed pursuant to RCW 79.11.010. (6) Evidences of debt secured by first mortgages or deeds of trust upon agricultural leasehold estates executed pursuant to RCW 79.11.010.</p> | <p>(1)(b) Chattel mortgages are subject to requirements of RCW 48.13.150. (1)(c) Seller's equity in any one such deed covering the balance due on sale of such property is limited to the greater of \$10,000 or the amount permissible under RCW 48.13.030.</p> <p>(5) Leasehold estates must run for at least 15 years beyond the maturity of the loan as made or as extended, in improved real property, be otherwise unencumbered, and the mortgagee must be entitled to be subrogated to all the rights under the leasehold.</p> <p>(6) Agricultural leasehold estates must be otherwise unencumbered, and the mortgagee must be entitled to be subrogated to all the rights under the leasehold.</p> <p>Except for investments made under (3) and (4) and guaranteed by FHA or VA, investments are limited to 75% of the fair value of the property as of the date of investment (80% of market value for certain loans secured by first mortgages on single-family residential buildings). RCW 48.13.120</p> <p>Exceptions for certain securities received on the sale or exchange of real property acquired under RCW 48.13.160.</p> | <p>48.13.110</p> <p>See 48.13.125 for limitation on amortization of loans on one-family dwellings.</p> <p>See 48.13.130 for definition of encumbrance.</p> <p>See 48.13.140 for appraisal of property, insurance requirements and the limit on loans upon the security of any one parcel of real property (the greater of \$25,000 or the amount permissible under 48.13.030.</p> <p>See 48.13.265 for limits on investments secured by real estate.</p> |

| Security | Requirement/Restriction | RCW |
|--|---|--|
| <p>Real Property Owned – Home Office Building: (1) insurer home and branch office buildings; (2) real property acquired in satisfaction or on account of loans, mortgages etc. previously owing to the insurer in the course of its business; (3) real property (a) required for convenient transaction of business; (b) acquired by gift or devise; (c) acquired in exchange for real property owned by insurer; (d) acquired through a lawful merger or consolidation with it of another insurer, (e) requisite or desirable for the protection or enhancement of the value of other real property owned by the insurer; (4) income-producing property.</p> | <p>(1) OIC approval required if investment in home office etc. exceeds 10% of assets.</p> <p>(3) Investment in real property can include repair, alteration, furnishing, or improvement thereof and is subject to the requirements of RCW 48.13.160(3). See statute for complete description, including when OIC approval may be required.</p> <p>(4) Investment in income producing property is subject to the requirements of RCW 48.13.160(4). See statute for complete description with respect to insurer asset size, capital and surplus, and other conditions for investment that must be met.</p> | 48.13.160 |
| <p>Disposal of Real Property - Time Limit: Real property acquired by an insurer pursuant to loans, mortgages, liens, judgments, or other debts, or under RCW 48.13.160(3)(a);(b), (c), (d), and (e).</p> | <p>Property acquired under RCW 48.13.160(3)(a) must be disposed of within 5 years of ceasing to be of use in the transaction of business.</p> <p>Property acquired pursuant to loans, mortgages, liens, judgments, or other debts, or under RCW 48.13.160(3)(b), (c), (d), and (e) must be disposed of within 5 years of acquisition, unless OIC approves a longer time.</p> | 48.13.170 |
| <p>Foreign Securities: Obligations of foreign governments including provinces, counties, municipalities, or similar entities, and obligations and securities of foreign corporations, which have not been in default during the five years next preceding date of acquisition, and if the foreign jurisdiction has a sovereign debt rating of SVO 1.</p> | <p>Limited to 10% of assets.</p> <p>Investment made in any one foreign country is limited to 5% of assets.</p> | 48.13.180 |
| <p>Policy Loans: Loans to policyholders upon the pledge of the policy as collateral.</p> | <p>Amount of respective loan cannot exceed the legal reserve maintained on the policy.</p> | 48.13.190 |
| <p>Savings and Share Accounts: Share or savings accounts of savings and loan associations or savings accounts of banks.</p> | <p>Amount deposited in any one institution is limited to amount insured by FSLIC or FDIC.</p> | 48.13.200 |
| <p>Insurance Stocks: Stocks of U.S. domiciled insurers that also meet the qualifications for stocks under RCW 48.13.220.</p> | <p>Limited to the lesser of 5% of assets or 25% of surplus over its capital stock and other liabilities. Unless a subsidiary, investment is limited to 5% of the voting stock of any one insurer and RCW 48.13.030.</p> | 48.13.210 Note: Limits do not apply to OIC approved mergers and stock dividends on shares already owned. |
| <p>Limitation on Insurer Loans or Investments (Investment in Non-Insurer Subsidiaries): Common stock, preferred stock, debt obligations, and other securities of one or more subsidiaries as defined in RCW 48.31B.005.</p> | <p>Limited to the lesser of 10% of assets, or 50% of its surplus as regards policyholders.</p> | 48.13.218 Note: Subsidiaries that are insurers, healthcare service providers and HMOs are excluded. |

| Security | Requirement/Restriction | RCW |
|--|---|--|
| <p>Common Stocks: Common shares of stock in solvent U.S. corporations that qualify as a "sound investment."</p> | <p>Must first satisfy requirements of RCW 48.13.260 for investment of capital and reserves.</p> <p>Limited to 50% of surplus over the minimum required surplus.</p> <p>Subject to limitations of RCW 48.13.030 (single issuer), investment is limited to 10% of the outstanding common stock of same issuer (exception for stock of certain subsidiaries of the insurer).</p> | <p>48.13.220</p> <p><u>Note:</u> 90 days notice to OIC is required prior to acquisition of a majority of the total outstanding common shares of any corporation.</p> |
| <p>Collateral Loans: Loans upon the pledge of securities or evidences of debt eligible for investment.</p> | <p>Limited to 90% of the market value of such collateral pledged, except that loans upon pledges of U.S. government bonds may be equal to the market value of the bonds pledged, subject to the maximums under RCW 48.13.030.</p> | <p>48.13.230</p> |
| <p>Miscellaneous Investments: Loans or investments not otherwise eligible for investment and not specifically prohibited by RCW 48.13.270 and not described in RCW 48.12.020 (non-allowable assets).</p> | <p>Limited to the lesser of 10% of assets or 50% of surplus over capital and other liabilities.</p> <p>Investment in or loan upon the security of any one entity is limited to the lesser of the limit described above or 1% of assets. [Exceptions require special consent order from OIC.]</p> | <p>48.13.240</p> <p><u>Note:</u> The insurer shall keep a separate record of all "miscellaneous" investments.</p> |
| <p>Special Consent Investments: Investments not otherwise eligible, but still qualified under RCW 48.13.020 (general qualifications) and for which advance approval from the OIC is obtained.</p> | <p>The approval from the OIC will specify whether the investment may be credited to required minimum capital or surplus investments, or to investments of reserves.</p> | <p>48.13.250</p> |
| <p>Required Investments for Capital and Reserves:</p> <p>for Capital: Cash or investments eligible under RCW 48.13.040 (public obligations), and mortgage loans on real property located <u>within this state</u>, pursuant to RCW 48.13.110.</p> <p>for Reserves: Cash or premiums in course of collection or investments under RCW 48.13:</p> <ul style="list-style-type: none"> .040 (public obligations), .050 (corporate obligations), .080 (preferred or guaranteed stocks), .090 (trustees' or receivers' obligations), .100 (equipment trust certificates), .110 (mortgages, loans and contracts), .150 (auxiliary chattel mortgages), .160 (real property home office bldg. etc.), .180 (foreign securities), .190 (policy loans), .200 (savings and share accounts), .220 (common stocks), .230 (collateral loans), .250 (special consent investments). | <p>Not less than 100% of the investments required for capital and reserves.</p> | <p>48.13.260</p> |
| <p>Investments Secured by Real Estate - Amount Restricted: real estate, real estate contracts, and notes, bonds and other evidences of debt secured by mortgage on real estate as described in RCW 48.13.110 and .160.</p> | <p>Limited to 65% of assets-all investments in mortgage-backed securities qualifying under the secondary mortgage market enhancement act of 1984 are included in determining if an insurer has exceeded the 65% limit.</p> | <p>48.13.265</p> |

| Security | Requirement/Restriction | RCW |
|---|---|---|
| <p>Acquisition of Medium and Lower Grade Obligations: Medium obligations are rated 3 by the NAIC's securities valuation office. Lower grade obligations are rated 4, 5 or 6 by the NAIC's securities valuation office.</p> | <p>Investment in medium and lower grade obligations is limited to 20% of admitted assets. (Limited to 1% in obligations issued, guaranteed, or insured by one institution.)</p> <p>Investment in lower grade obligations is limited to 10% of admitted assets. (Limited to 0.5% in obligations issued, guaranteed, or insured by 1 institution.)</p> <p>Investment in lower grade obligations rated 5 or 6 is limited to 3% of admitted assets.</p> <p>Investment in lower grade obligations rated 6 is limited to 1% of admitted assets.</p> | <p>48.13.273</p> <p>Note: If insurer intends to invest more than 2% of admitted assets in medium and lower grade obligations, the BOD must approve a written plan for making those investments.</p> |
| <p>Obligations Rated by the Securities Valuation Office: Obligations rated 1 or 2 by the NAIC's securities valuation office.</p> | <p>Investment subject to the limitations under RCW 48.13.030 (single issuer).</p> | <p>48.13.275</p> |
| <p>Derivative Transactions: Options, warrants used in hedging transactions and not attached to another financial instrument, caps, floors, collars, swaps, forwards, futures, and any other agreements, options, or instruments substantially similar thereto or any series or combination thereof and any agreements, options, or instruments permitted under rules adopted by the OIC.</p> <p>Income generation transactions: (1) Sales of covered call options on noncallable fixed income securities, callable fixed income securities; (2) Sales of covered call options on equity securities, (3) Sales of covered puts on investments that the insurer is permitted to acquire under Chapter 13, (4) Sales of covered caps or floors.</p> | <p>Aggregate statement value ("ASV") of options, caps, floors, and warrants not attached to a financial instrument purchased and used in hedging transactions is limited to 7.5% of admitted assets. (ASV of options, caps, and floors written in hedging transactions is limited to 3% of admitted assets.) The aggregate potential exposure of collars, swaps, forwards, and futures used in hedging transactions is limited to 6.5% of admitted assets.</p> <p>For income generation transactions, the ASV of fixed income assets subject to call or that generate cash flows for payments under the caps or floors, plus the face value of fixed income securities underlying a derivative instrument subject to call, plus the amount of the purchase obligations under the puts, is limited to 10% of admitted assets.</p> <p>(1) Permitted if the option expires by its terms prior to the end of the noncallable period, or derivative instruments based on fixed income securities. (2) Permitted if the insurer holds or can immediately acquire through the exercise of options, warrants, or conversion rights already owned, the equity securities subject to call during the complete term of the call option sold. (3) Permitted if the insurer has escrowed, or entered into a custodian agreement segregating, cash or cash equivalents with a market value equal to the amount of its purchase obligations under the put during the complete term of the put option sold. (4) Permitted if the insurer holds the investments generating the cash flow to make the required payments under the caps or floors during the complete term that the cap or floor is outstanding.</p> | <p>48.13.285</p> <p>Note: Permitted only to engage in hedging transactions and certain income generation transactions, not for speculation.</p> <p>Insurer must be able to demonstrate to the OIC the intended hedging characteristics and the ongoing effectiveness of the derivative transaction(s) through cash flow testing or other appropriate analysis.</p> |

| | |
|--|-----------|
| <p>Prohibited Investments:</p> <p>(1) Issued shares of its own capital stock.</p> <p>(2) Securities issued by any corporation if a majority of its stock having voting power is owned directly or indirectly by or for the benefit of any one or more of the insurer's officers and directors.</p> <p>(3) Any investment or loan ineligible under the provisions of RCW 48.13.030 (single issuer or depository institution).</p> <p>(4) Securities issued by any insolvent corporation.</p> <p>(5) Obligations contrary to the provisions of RCW 48.13.273 (medium and lower grade obligations).</p> <p>(6) Any investment or security found by the OIC to be designed to evade prohibition of the Insurance Code.</p> | 48.13.270 |
| <p>Securities Underwriting, Agreements to Withhold or Repurchase – Prohibited:</p> <p>No insurer shall:</p> <p>(1) participate in the underwriting of the marketing of securities in advance of their issuance or enter into any transaction for such underwriting for the account of such insurer jointly with any other person; or</p> <p>(2) enter into any agreement to withhold from sale any of its property, or to repurchase any property sold by it.</p> | 48.13.280 |
| <p>Disposal of Ineligible Property or Securities:</p> <p>(1) Any ineligible personal property or securities acquired by an insurer may be required to be disposed of within the time not less than six months specified by order of the commissioner, unless before that time it attains the standard of eligibility, if retention of such property or securities would be contrary to the policyholders or public interest in that it tends to substantially lessen competition in the insurance business or threatens impairment of the financial condition of the insurer.</p> <p>(2) Any personal property or securities acquired by an insurer contrary to RCW 48.13.270 shall be disposed of forthwith or within any period specified by order of the commissioner.</p> <p>(3) Any property or securities ineligible only because of being excess of the amount permitted under Chapter 13 to be invested in the category to which it belongs shall be ineligible only to the extent of such excess.</p> | 48.13.290 |
| <p>Authorization of Investments:</p> <p>No investment, loan, sale or exchange thereof shall, except as to the policy loans of a life insurer, be made unless authorized or approved by the insurer's board of directors or by a committee charged by the board of directors or the bylaws with the duty of making such investment, loan, sale or exchange. The minutes of any such committee shall be recorded and reports thereof shall be submitted to the board of directors for approval or disapproval.</p> | 48.13.340 |
| <p>Record of Investments:</p> <p>A written record in permanent form showing the authorization of each investment or loan shall be made and signed by an officer of the insurer or by the chair of such committee authorizing the investment or loan. Records shall contain:</p> <p>(a) In the case of loans: the name of the borrower; the location and legal description of the property; a physical description, and the appraised value of the security; the amount of the loan, rate of interest and terms of repayment.</p> <p>(b) In the case of securities: the name of the obligor; a description of the security and the record of earnings; the amount invested, the rate of interest or dividend, the maturity and yield based upon the purchase price.</p> <p>(c) In the case of real estate: the location and legal description of the property; a physical description and the appraised value; the purchase price and terms.</p> <p>(d) In the case of all investments:</p> <p>(i) the amount of expenses and commissions if any incurred on account of any investment or loan and by whom and to whom payable if not covered by contracts with mortgage loan representatives or correspondents which are part of the insurer's records;</p> <p>(ii) the name of any officer or director of the insurer having any direct, indirect, or contingent interest in the securities or loan representing the investment, or in the assets of the person in whose behalf the investment or loan is made, and the nature of such interest.</p> | 48.13.350 |

Policy for Investment in Affiliates:

The Company will not invest in affiliates to the extent that such investment would be reportable under the Insurer Holding Company Act or the Disclosure of Material Transactions Model Law, or to the extent that such investment might, in the opinion of management, materially affect the overall liquidity of the Company's assets.

Approval Procedures for Mortgage Loans:

Subject to any statutory restrictions, any two members of the Mortgage Loan Committee may approve mortgage loans less than or equal to \$10 million.

Mortgage loans greater than \$10 million and less than or equal to \$20 million require the approval of all Committee members.

Loans in excess of \$20 million must be approved by the Company's shareholder (in addition to the general requirement of Board approval for all investments).

Applicant Name: Symetra Life Insurance Company

NAIC No. 68608
FEIN: 91-0742147

6-24

Exhibit 6-24

| SLIC Employees Licensed in Iowa | | | |
|--|-----------------|-----------------------|---------------------------|
| Name | Position | License Number | License Expiration |
| Bronder, Stephen A. | Employee | 0001717957 | 12/31/2016 |
| Cho, William W. | Employee | 0016557965 | 05/31/2015 |
| Dray, Jason D | Employee | 0009722687 | 09/30/2014 |
| Farrell, Andrew M. | Vice President | 0016388938 | 01/31/2015 |
| Guihan, Ashley A. | Employee | 0016847134 | 08/31/2015 |
| McDaniels, Marc R. | Employee | 0001954997 | 02/29/2016 |
| Murray III, John B. | Employee | 0006140246 | 08/31/2014 |
| Reynolds, Richard C. | Officer | 0007819147 | 08/31/2015 |
| Ruther, Michelle S. | Employee | 0009555041 | 05/31/2015 |
| Spaulding, Courtney L. | Employee | 0010944163 | 06/30/2015 |
| Sung, Matthew B. | Employee | 0011529342 | 03/31/2015 |
| Symonds, Kelley A. | Employee | 0004881845 | 10/31/2014 |

6.26.1



Symetra True

Variable Annuity®

Are you a **True** investor?



| | |
|--|--|
| Not a bank or credit union deposit or obligation | Not insured by any federal government agency |
| Not FDIC or NCUA/NCUSIF insured | Not guaranteed by any bank or credit union |
| | May lose value |

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What does a
true investor
look like?

True investors want to maximize growth potential and manage risk. They look to improve tax efficiency as long as it doesn't limit flexibility or create unnecessary costs ...

and they demand value.

Symetra True VA may be appropriate if you seek:

- > Low fees and flexibility
 - > Tax deferral
 - > Premier money managers and broad investment choices
 - > Automated sell strategies
 - > Wealth Transfer Benefit
 - > Flexible income options
-

True VA was built with flexibility in mind and not all of the benefits will be appropriate or attractive to you. Your investment professional can help you determine if True VA might help you meet your investment objectives.

Investment Objectives

Symetra True Variable Annuity (True VA) equips your investment professional with a financial planning solution that may meet many of your investment objectives.

Consider the following as you set your investment objectives:

Taxes

As a variable annuity, True VA allows for tax-deferred growth which can, over time, provide for a larger contract value. Keep in mind that a qualified account such as an IRA already provides tax deferral, so you should only consider True VA for IRAs if the other benefits are important to you.

Market volatility

One risk may be that your portfolio drops in value just as you retire or while you're taking income. True VA can't eliminate market volatility, but it does provide you and your investment professional with tools to help manage volatility in your portfolio.

True VA is worth a closer look.

Keeping up with inflation

In order for your money to have the opportunity to grow, it's important to consider the quality of the investment managers and overall diversification. Although diversification does not ensure a profit or guarantee against loss, True VA gives you access to a wide selection of premier money managers and asset classes to provide your investment portfolio a chance to beat inflation and potentially grow over time.

Your legacy

Over the long term, your hope is that your investments grow. In a variable annuity, if you have a gain your beneficiaries will have to pay taxes on that growth. True VA offers a solution that pays an enhancement at death which can be used to help cover part of the tax burden. It's an optional benefit that you can select when you purchase the contract. It carries an additional cost, but may be appropriate if you're looking to defray some of the tax bill.

True VA includes features to help your investment professional manage your money—and defer your tax bill along the way. It's a client-centric variable annuity with low fees,* no surrender charges and a transparent investment structure.

*Source: Morningstar survey of 482 open individual variable annuities on 3/31/2013. The total mortality and expense, administrative, and distribution expense fees for True VA equal 0.60%, placing it in the lowest quartile of variable annuities. If the maximum sub-account fund facilitation fee of 0.15% (which is not currently charged) were included in total expenses, True VA would still be in the lowest quartile of variable annuities. The comparison of total expenses does not include fees associated with the underlying funds.

Low fees, flexibility and transparency, without sacrificing quality >

Low Fees and Flexibility

The median cost of True VA, including underlying investment options, is between 0.86% and 1.39% of your contract value on an annual basis.¹

Mortality and Expense Charge

The mortality and expense charge (M&E) is the fee that pays for the annuity contract, including expenses to administer the contract and our obligation to make annuity payments. This charge has been set at a low annual rate of 0.60% of contract value and our sub-accounts only include institutional share classes for our funds, as we pay no retail commissions.

Flexibility without the cost

Variable annuities have often been criticized for surrender charges that lock investors into the contract for extended periods of time.

For a \$25,000 minimum investment, True VA offers flexibility *without* surrender charges. With True VA, you have the flexibility to move out of a contract that no longer fits your needs. For nonqualified contracts you can enjoy the benefits of tax deferral for as long as you like and when you're ready to withdraw, pay ordinary income taxes at your applicable rate. You only pay taxes on the gains above your original basis. Additionally, a 10% federal tax penalty may apply to withdrawals on gains made before age 59½.

¹ Total costs are calculated by adding the mortality and expense fee to the median fund expense ratio for sub-accounts investing in both active and passive underlying funds as of 12/31/12.

A key to effectively implement any investment strategy is to control the total cost of a product. With True VA, costs have been significantly reduced utilizing institutional share classes for our investment options, lowering certain distribution expenses.

| Symetra True VA | | |
|---------------------------|---------------|--------------|
| | Passive Funds | Active Funds |
| Mortality & Expense (M&E) | 0.60% | 0.60% |
| Median Fund Expenses | 0.26% | 0.79% |
| Total² | 0.86% | 1.39% |

"Passive Funds" refers to Symetra True VA sub-accounts that simply seek to mimic the performance of a specific index.

"Active Funds" refers to Symetra True VA sub-accounts that apply a portfolio management strategy with the goal of outperforming or otherwise adding value relative to an investment benchmark.

² This total expense excludes fees for the optional rider as well as any applicable fees for transfers of contract value between sub-accounts. Symetra may impose a fund facilitation fee on the sub-accounts. We currently do not assess this fee. The fee is set at a maximum annual rate of 0.15% of contract value. We will provide written notification in advance if we choose to assess this fee.

Tax Deferral

The power of tax-deferred growth means you can keep more of your money working for you.

Defer taxes on your portfolio

Taxes are an inevitable reality of accumulating wealth. Everyone who earns income is expected to pay their fair share in taxes. The “drag” created as the government takes its share along the way leaves less money working for you each year.

If you have substantial holdings in tax-inefficient assets, you may want to consider an investment in True VA. What makes an investment tax-inefficient? One that delivers most or all of its total return in forms that are heavily taxed.

With True VA, all investment activity occurs within a platform that defers taxation on interest income, dividends or capital gains. When you eventually withdraw money, taxes will be due on investment gains at your ordinary income tax rate. Additionally a 10% federal tax penalty may apply to withdrawals on gains made before age 59½.

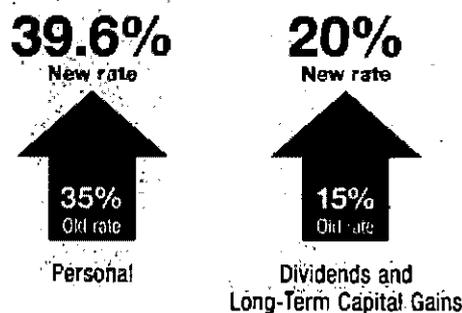
And, unlike an IRA, there are no mandatory distributions required with a nonqualified variable annuity which means you have more control over when you pay taxes.

The need for tax control

The new higher tax rates for 2013 mean even more tax drag for high income investors. Saving for retirement without taking advantage of deferring taxes on interest income, dividends and capital gains can seriously erode your portfolio's growth potential. So who stands to benefit the most from tax deferral?

- Those with a substantial amount of assets earmarked for retirement, sitting in nonqualified accounts
- Top bracket wage earners—\$400K (single) and \$450K (joint filers) annually
- People living in high income tax states
- Investors who actively trade within their investment portfolios
- Those earning \$250k per year with net investment income
- Investors who are likely to be in a lower tax bracket at the time they take withdrawals

Higher “Top Rate” Marginal Tax Rates in 2013

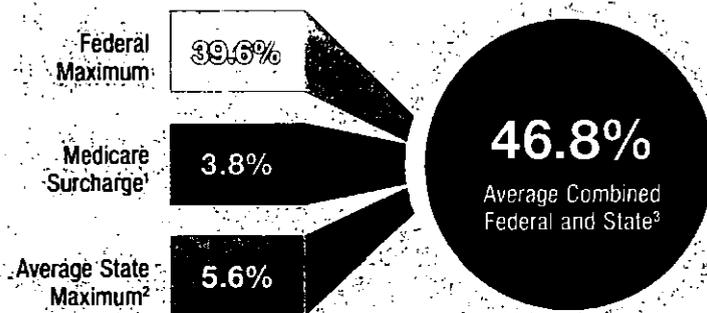


Why consider tax deferral?

In many cases, an investment with earnings that grow tax-deferred may create more value, after tax, than one that is taxed annually. Accordingly, in the world of taxable investing, asset location may be as important as asset allocation. Why? Because while asset allocation deals with *what* investments you should own, asset location is about *where* you should own them. Once you've reached your qualified account limits, considering an investment vehicle that defers taxes on nonqualified money starts to make a lot of sense.

When you combine all the federal and state taxes that come into play, and even take into account that state taxes are deductible from federal taxable income, investors in the top marginal tax bracket may be losing almost half of their interest earnings to taxes.

2013 Top Marginal Tax Rates on Interest Earnings



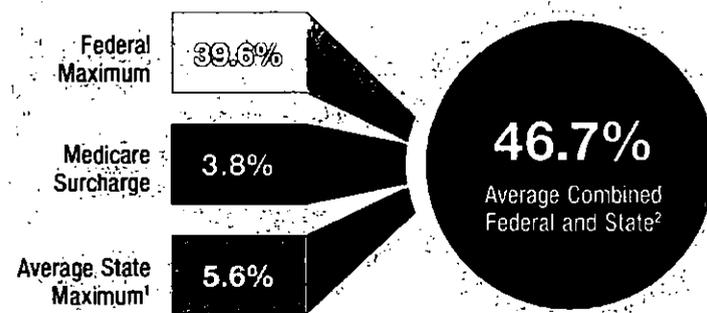
¹ Beginning in 2013, a federal tax on investment income for households earning more than \$250,000. Source: 2013 Federal Tax Update, May 23, 2012, by James N. Phillips and Timothy C. Smith.

² Source for average state maximum rate – Federation of Tax Administration 2012; average includes Washington D.C. as well as 7 states with no state income tax.

³ Takes into account that state taxes are deductible from federal taxable income.

Frequent turnover of assets can lead to short term capital gains which are taxed at ordinary income rates. This means a combined marginal tax rate of over 46% for top-bracket investors and even more states with high income tax rates.

2013 Top Marginal Tax Rates on Short-Term Capital Gains



¹ Federation of Tax Administrators 2012; average includes Washington D.C. as well as nine states with no state tax on capital gains.

² Takes into account that state taxes are deductible from federal taxable income.

Choose from a broad array of investments >

Investment Choices



(P) Denotes a passive index portfolio

Large Cap

Large Cap Value

American Century® VP Value Fund
 DFA VA US Large Value Portfolio
 Invesco V.I. Comstock Fund
 Mutual Shares Securities Fund—Class 1
 Symetra Yacktman Focused Fund
 T. Rowe Price Equity Income Portfolio
 Vanguard® VIF – Equity Income Portfolio

Large Cap Growth

American Funds Insurance Series Growth Fund
 BlackRock Capital Appreciation V.I. Fund
 Fidelity® VIP Contrafund® Portfolio – Initial Class
 MFS® Growth Series
 T. Rowe Price Blue Chip Growth Portfolio
 T. Rowe Price New America Growth Portfolio
 Vanguard VIF – Capital Growth Portfolio

Large Cap Blend

American Funds Insurance Series Growth-Income Fund
 Dreyfus VIF Appreciation Portfolio – Initial Shares
 Franklin Rising Dividends Securities Fund
 Invesco V.I. Core Equity Fund
 Pioneer Fund VCT Portfolio
 Sentinel VP Common Stock Fund
 Vanguard VIF – Equity Index Portfolio (P)
 Vanguard VIF – Total Stock Market Index Portfolio (P)
 Virtus Premium AlphaSector Series

Mid Cap

Mid Cap Value

AllianceBernstein VPS Small/Mid Cap Value Portfolio Class A
 American Century VP Mid Cap Value Fund
 Janus Aspen Perkins Mid Cap Value Portfolio
 JPMorgan Insurance Trust Mid Cap Value Portfolio

Mid Cap Growth

Columbia VP Mid Cap Growth Fund
 Delaware VIP® Smid Cap Growth Series, Standard Class
 Fidelity VIP Mid Cap Portfolio – Initial Class
 Janus Aspen Enterprise Portfolio

Mid Cap Blend

Invesco V.I. Mid Cap Core Equity Fund
 Vanguard VIF – Mid-Cap Index Portfolio (P)

Small Cap

Small Cap Value

Columbia VP Small Cap Value Fund
 Delaware VIP Small Cap Value Series, Standard Class
 DFA VA US Targeted Value Portfolio

Small Cap Growth

MFS® New Discovery Portfolio
 Sentinel VP Small Company Fund
 Vanguard VIF – Small Company Growth Portfolio
 Virtus Small-Cap Growth Series

Small Cap Blend

Calvert VP Russell 2000 Small Cap Index Portfolio (P)
 Invesco V.I. Small Cap Equity Fund
 Royce Capital Fund – Micro-Cap Portfolio
 Royce Capital Fund – Small-Cap Portfolio

International/Foreign Equities

Foreign Large Cap Value

Delaware VIP International Value Equity Series, Standard Class
DFA VA International Value Portfolio
Templeton Foreign Securities
MFS® International Value Portfolio

Foreign Large Cap Growth

Invesco V.I. International Growth Fund
MFS® International Growth Portfolio
T. Rowe Price International Stock Portfolio
Vanguard VIF – International Portfolio

Foreign Large Cap Blend

American Funds Insurance Series International Fund
Calvert VP EAFE International Index Portfolio (P)
Columbia VP International Opportunity Fund
Janus Aspen Overseas Portfolio
Virtus International Series

Foreign Small and Mid Cap

DFA VA International Small Portfolio

Fixed Income

Emerging Markets Bond

PIMCO Emerging Markets Bond Portfolio Institutional
Symetra DoubleLine® Emerging Markets Income Fund

Government Bond

Franklin U.S. Government Fund
MFS® Government Securities Portfolio
PIMCO Long-Term U.S. Government Portfolio Institutional

High Yield Bond

BlackRock High Yield V.I. Fund
Columbia VP Income Opportunities Fund
Vanguard VIF – High Yield Bond Portfolio

Short Term Bond

DFA VA Short-Term Fixed Portfolio
PIMCO Low Duration Portfolio Institutional
Vanguard VIF – Short-Term Investment-Grade Portfolio

Intermediate Term Bond

Fidelity VIP Investment Grade Bond Portfolio – Initial Class
Janus Aspen Flexible Bond Portfolio
PIMCO Total Return Portfolio Institutional
Sentinel VP Bond
Symetra DoubleLine® Total Return Fund
Vanguard VIF – Total Bond Market Index Portfolio (P)

World Bond

DFA VA Global Bond Portfolio
PIMCO Foreign Bond Portfolio (Unhedged) Institutional
PIMCO Global Bond Portfolio (Unhedged) Institutional
Templeton Global Bond Securities Fund

Multi-Sector Bond

Fidelity VIP Strategic Income – Initial Class
Franklin Strategic Income Securities Fund
PIMCO Unconstrained Bond Portfolio Institutional
Pioneer Strategic Income VCT Portfolio
Virtus Multi-Sector Fixed Income Series

Specialty

Commodities

PIMCO CommodityRealReturn® Strategy Portfolio Institutional

Real Estate

AllianceBernstein VPS Real Estate Investment Portfolio Class A
Fidelity VIP Real Estate – Initial Class
Vanguard VIF – REIT Index Portfolio (P)
Virtus Real Estate Securities Series

Natural Resources

Van Eck VIP Global Hard Assets

Inflation Protection Bond

PIMCO Real Return Portfolio Institutional

Sector

Technology

Fidelity VIP Technology – Initial Class

Utilities

MFS® Utilities Series

Financials

Fidelity VIP Financial Services – Initial Class

Energy

ALPS/Alerian Energy Infrastructure Portfolio
Fidelity VIP Energy – Initial Class

Health Care

T. Rowe Price Health Sciences Portfolio

World Allocation

BlackRock Global Allocation V.I. Fund
Invesco V.I. Balanced-Risk Allocation Fund I
PIMCO All Asset Portfolio Institutional
PIMCO Global Multi-Asset Portfolio Institutional

Money Market

Vanguard VIF – Money Market Portfolio

Balanced

Vanguard VIF – Balanced Portfolio

Conservative Allocation

Franklin Income Securities Fund – Class 1

Global Real Estate

Invesco V.I. Global Real Estate Fund

Global Equities – World Stock

American Funds Insurance Series Global Growth & Income Fund
Mutual Global Discovery Securities Fund
PIMCO EqS Pathfinder Portfolio™ Institutional Class

Emerging Markets

American Funds Insurance Series New World Fund
Templeton Developing Markets Securities Fund
Delaware VIP Emerging Markets Series, Standard Class

Multi-Alternative

DWS Alternative Asset Allocation VIP A
Van Eck VIP Multi-Manager Alternatives

Market Neutral

The Merger Fund VL

Investment
Objectives

Low Fees
& Flexibility

Tax
Deferral

Investment
Choices

Automated
Sell Strategies

Wealth
Transfer Benefit

Automated Sell Strategies

An optional tool to help manage risk.¹

Set sell strategies based on your risk tolerance.

Behavioral finance research confirms what investment professionals have said for years: an ad hoc investment strategy is prone to emotional decisions made largely on the basis of fear, greed and trying to gain a sense of control during times of market turmoil.²

Long-term success requires discipline and a sophisticated rebalancing strategy. Although the strategy itself cannot ensure a profit or guarantee against a loss, this automated tool gives your investment professional a way to implement sell strategies based on your risk tolerance, for both rising and falling markets. Depending on your investment professional's service offering to you, this may or may not be something he or she would want to utilize.

Normally, an investor's risk tolerance is tied to the overall investment portfolio. You might say you are comfortable with a portfolio that goes down 20% and up 40%. The problem is that sometimes one or more of the investments within the portfolio goes down (or up) a lot more than that. Your investment professional can now institute automated sell strategies so you can put limits on the individual sub-accounts/asset classes in the portfolio.

You decide when it's time to lock in your gains and when to stop the losses for each of your sub-accounts.

Here's how it works:

The gains and losses on your investments will be monitored individually based on your strategy. When you reach a predetermined percentage gain within a sub-account, that sub-account will be liquidated and the proceeds transferred into another investment of your choice. Likewise, when one of your sub-accounts drops to a predetermined level you choose, it's automatically sold and the proceeds move to another sub-account according to your instructions.

When choosing the destination sub-account(s), you may want to take the opportunity to transfer to the money market fund instead and give yourself time before reinvesting. Alternatively, you may choose to reallocate the money to other sub-accounts, or later reinvest back into the same sub-account.

Hypothetical Illustration of Automated Sell Strategies at Work³

01 Set Trigger Point

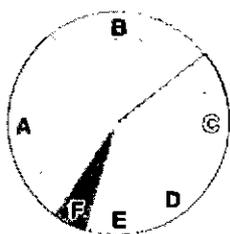
Establish individual sub-account trigger points for portfolio

02 Trigger Point Hits

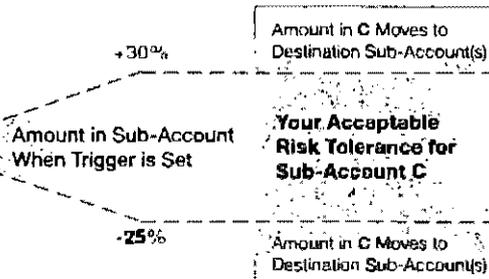
Trigger point based on value of sub-account on day trigger is set

03 Proceeds Transfer

Money moves to chosen destination sub-account(s)



| Sub-Account | Gain Trigger | Loss Trigger |
|-------------|--------------|--------------|
| A | +50% | -20% |
| B | +45% | -30% |
| C | +30% | -25% |
| D | none | -30% |
| E | none | -25% |
| F | none | none |



All of this trading occurs inside the variable annuity itself, so your risk management decisions aren't hindered by short-term tax consequences.⁴ There are no applicable fees or restrictions for these transactions, and you are free to change your strategy/percentage trigger at any time.

¹ Symetra Life Insurance Company does not give investment, tax or legal advice.

² The Research Foundation of CFA Institute Literature Review, 2008.

³ Hypothetical results are for illustrative purposes only and not intended to represent past performance, or to predict the future performance of any specific investment.

⁴ Transfers of contract value between sub-accounts, including those resulting from implementing automated sell strategies, generally do not have federal income tax consequences. Please consult your tax advisor for more information. Please note: since orders are executed after the close of the business day, the actual trade will not occur until the following business day. Consequently, the gain or loss may vary from the target sell price. Orders automatically terminate after 18 months, but can be renewed at any time.

Offset the impact of taxes for your beneficiaries >

Wealth Transfer Benefit

Symetra True VA offers an optional Wealth Transfer Benefit rider that provides an additional benefit to help pay taxes at death.

While federal tax law does not provide a step-up in tax basis for annuities at death, Symetra has created a Wealth Transfer Benefit (WTB) rider that may offset some of the tax burden for your beneficiaries when they withdraw money from the contract.¹

This cost-effective death benefit provides your beneficiaries with an additional amount of 50% of your accumulated earnings in your contract at the time of death to help cover taxes or other costs.

As you age, the annual rate used to calculate your WTB rider charge will increase and could cause the WTB rider charge applicable to you to also increase. The increase could be significant. And it's possible that although you may pay for the benefit over time, you may never receive it should your account drop in the future.

Additionally, a spouse who continues the contract may also be able to continue the WTB rider if he or she is younger than age 76. Other restrictions apply, so please review the prospectus for more information.

You are free to remove the WTB rider at any time, but it cannot be reinstated once removed.

¹ This information is not complete and is not intended as tax advice. You should consult a competent tax advisor about the possibilities of tax law changes and your individual circumstances.

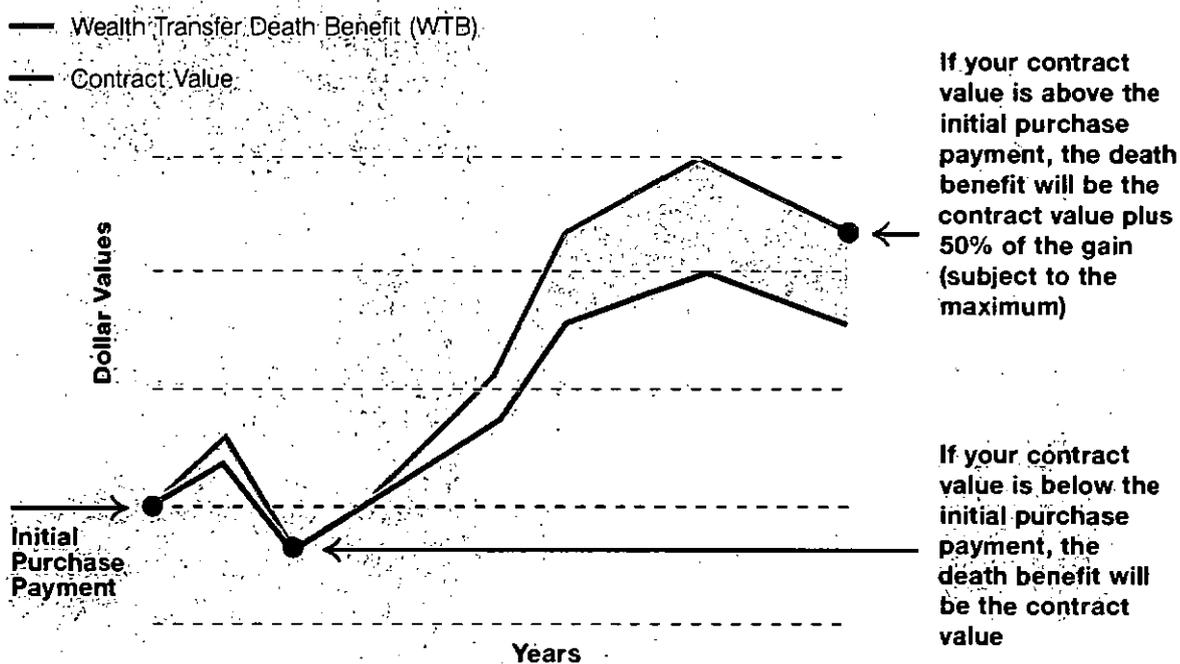
² If you elect this rider, we will deduct an additional charge on the first business day of each contract month when there is a gain in your contract. Gender is not factored into the cost of the rider in the state of Montana, nor for employer plans (SEP and SIMPLE).

Pay for the Wealth Transfer Benefit only when there is a gain in the contract.

A True Wealth Transfer Benefit

- Pays 50% of the gain in the contract, up to 500% of the total purchase payments (as measured on the first business day of each month).
- This optional rider must be selected at time of purchase.
- Charges are based on age and gender as well as the gain above your total purchase payments at the time the fee is assessed. Please consult the prospectus for the current fee schedules.²
- Withdrawals will reduce gains on a dollar-for-dollar basis.

Here's how it works:



*Assumes that only the initial purchase payment is paid and no withdrawals are made.

Plus: Guaranteed Income

You won't outlive your retirement savings.¹

With our guaranteed income options, anytime after the first contract year and before your 95th birthday, you can convert all or part of your annuity's contract value into an income stream that lasts for a specified period of time or your lifetime. You have the option of waiting until your 101st birthday (subject to approval); however if you have elected the Wealth Transfer Benefit Rider it will be terminated.

Annuitizing, or converting the contract value into a stream of income, can have several advantages:

- **Stability** You enjoy guaranteed, regular payments for as brief as five years or as long as a lifetime.
- **Inflation protection** At the time of annuitization, you can choose to have your payments increased annually, by as little as 0.10% or as much as 6.5% per year, to help offset the impact of inflation. You may select any increase amount between these two numbers, in increments of 0.10%.
- **Tax advantages** If the money is nonqualified, a portion of each payment is a non-taxable return of purchase payment. The proportion of each payment that is considered a return of purchase payment and is therefore not taxed is called the Exclusion Ratio. In addition to the exclusion ratio, there are tax benefits, for those who want to withdraw funds gradually as well. While currently taxable products will generate a tax bill on the value of all taxable events taking place in the product (such as dividends, and short/long term capital gains), earnings from a nonqualified variable annuity are only taxed once they are withdrawn from the contract. The remaining contract value continues to enjoy the benefits of tax-deferral.
- **Flexibility** You don't have to annuitize your entire contract value. You can opt to have only a portion of the contract value applied to an annuity payment option. This means the contract value would be divided into two parts. The non-annuitized portion would remain in the accumulation phase, while the annuitized portion would be moved to the income phase.

¹ If lifetime payout option is selected.

Consider Symetra True VA for:

- > Low fees and flexibility
- > Improved tax efficiency by investing a greater portion of your portfolio in a tax-deferred vehicle
- > Access to premier money managers and a broad investment selection
- > Sophisticated risk management tools
- > Wealth Transfer Benefit for legacy planning
- > Guaranteed income options

Please talk to your investment professional to see if True VA may be right for you.

Important Disclosures

Before investing, carefully consider the investment objectives, risks, charges and expenses. This and other information is contained in the contract prospectus and the underlying portfolio prospectuses. Please call or write your Registered Representative or Symetra for free copies of the prospectus or visit www.symetra.com for online copies and read them carefully before investing.

An investment in the Money Market Portfolio is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Although the Portfolio seeks to preserve the value of your investment at \$1.00 per share, it is possible to lose money by investing in the Portfolio.

Securities are offered through Symetra Securities, Inc. (SSI). Symetra True Variable Annuity is a flexible premium deferred variable annuity issued by Symetra Life Insurance Company (SLIC). Contract form number is ICC12_RC1 and WTB rider form number is ICC12_RE1 in most states and is not available in all states or any U.S. territory. SSI and SLIC are affiliates and are both located at 777 108th Avenue NE, Suite 1200, Bellevue, WA 98004-5135.

Guarantees and benefits are subject to the claims-paying ability of Symetra Life Insurance Company.

Withdrawals may be subject to federal income tax and a 10% IRS early withdrawal tax penalty may also apply to amounts withdrawn prior to age 59½. Consult your attorney or tax advisor for more information.

Variable annuities, which are suitable for long-term investing, are subject to market risks, including the potential loss of principal invested. Like many variable annuities, this contract has terms and limitations for keeping it in force. Please contact your Registered Representative for complete details.

A rider is a provision of the annuity with benefits and features that should never be confused with the annuity itself. Before evaluating the benefits of a rider, carefully examine the annuity to which it is attached.

Certain conditions, restrictions and limitations are associated with the Wealth Transfer Benefit rider. If contract owners elect this rider, they may not realize the benefits if they experience no gain or consistently negative rates of return.

Funds in which the sub-accounts invest may have their own policies and procedures regarding short-term investments and may impose fees or restrictions on short-term trading. If these fees apply, they will be deducted from the contract value.

There are special risks associated with investing in certain underlying funds. Examples may include small company, geographic, international, emerging markets and sector focus. See your prospectus(es) before investing.

The PIMCO All Asset Portfolio – Institutional Class, is a “fund of funds” and is subject to the risks of the underlying funds, including the volatility of the financial markets in the U.S. and abroad, as well as the additional risks associated with investing in high yield, small-cap and foreign securities.

While nonqualified annuities offer the added benefit of tax deferral, in the case of qualified annuities, the tax deferral is provided by the retirement plan itself. Investors should focus on the benefits offered by a variable annuity to assess if a variable annuity is right for them.

Nothing in this brochure is intended to be investment, tax or legal advice.

Annuity contracts have terms and limitations for keeping them in force. Please contact your Registered Representative for complete details.

DoubleLine® is a registered trademark of DoubleLine Capital LP.

Vanguard is a trademark of The Vanguard Group, Inc.

Symetra is a diversified, well-capitalized company on the rise, as symbolized by our brand icon—the swift. We’ve operated on a foundation of financial stability, integrity and transparency for more than half a century, providing solutions that clients need through investment professionals, financial institutions, benefit consultants and independent agents. Symetra Financial Corporation trades as “SYA” on the NYSE. Symetra Life Insurance Company is a wholly owned subsidiary of Symetra Financial Corporation.

To learn more about us, visit www.symetra.com or www.trueva.com



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www.symetra.com

Symetra® and True Variable Annuity® are registered service marks of Symetra Life Insurance Company.



Symetra True

Variable Annuity®

Fact Sheet and Fund Reference Guide

| | | |
|--|--|----------------|
| Not a bank or credit union deposit or obligation | Not insured by any federal government agency | |
| Not FDIC or NCUA/NCUSIF insured | Not guaranteed by any bank or credit union | May lose value |

Fact Sheet

Symetra True Variable Annuity®

| | |
|---|--|
| Issue Ages | 0–85 |
| Account Type | Nonqualified Qualified: IRA, Roth IRA, SIMPLE IRA, SEP IRA |
| Minimum Initial Purchase Payment | \$25,000 |
| Minimum Subsequent Purchase Payments | Electronic: \$250 Check: \$1,000 |
| Maximum Purchase Payments | \$2 million. Amounts above \$2 million are subject to approval. |
| Mortality & Expense Charge | 0.60% |
| Net Total Annual Portfolio Expenses | Please see Investment Choices for individual portfolio expenses. ¹ |
| Sub-Account Fund Facilitation Fee | 0% with a possible maximum of 0.15%. We currently do not assess this fee. |
| Surrender Charges | None |
| Annual Administration Charge | None |
| Contract Maintenance Charge | None |
| Investment Options | More than 100 sub-accounts. |
| Automated Sell Strategies | This optional automated system tool allows you or your investment professional to establish sell orders based on your personal risk tolerance level. The tool is designed to lock in gains or limit losses based on a predetermined increase/decrease percentage amount ("trigger") that you establish for any sub-account in which you are invested. ² Proceeds from liquidated sub-accounts automatically move into a sub-account preselected by you. There are no applicable fees or restrictions for these transactions, and you are free to change your strategy/percentage trigger at any time. Orders are processed on the following business day, and the gain or loss may vary from the targeted sell or trigger price. ³ |

| | |
|--|--|
| Income Options | Any time after the first contract year and before your 95th birthday, you can convert all or part of your annuity's contract value into an income stream that lasts for a specified period of time or your lifetime. You have the option of waiting to annuitize until your 101st birthday (subject to approval); however, the Wealth Transfer Benefit Rider, if elected, will be terminated. |
| Transfers | You have 25 free transfers per contract year. Additional transfers are \$25 each. All transfers on a given day will be treated as a single transfer. Minimum transfer amount is \$500 or the entire sub-account balance, whichever is less. Systematic transfer strategies are not subject to transfer fees. |
| Sub-Account Rebalancing | Sub-account allocations can be updated automatically on a monthly, quarterly, semi-annual or annual basis in order to maintain a predetermined percentage allocation. |
| Dollar-Cost Averaging | You can systematically transfer invested funds from one sub-account to another to help achieve a lower average cost per unit. Please consider your ability to continue investing during periods of low price levels. Dollar-cost averaging does not assure a profit or prevent a loss in declining markets. |
| Withdrawals | Partial or full withdrawals are available without surrender charges. Repetitive withdrawals are also available. |
| Wealth Transfer Benefit (WTB) Rider | <p>This optional death benefit rider provides an additional benefit at death equal to 50% of the gain in the contract, up to 500% of the total purchase payments. Charges are based on age and the amount of the additional benefit, as well as gender in most states. The monthly charges only occur if there is a gain in the contract value. The rider must be elected at the time you purchase your contract and can be removed at any time. Once the rider has been removed, it cannot be reinstated.</p> <p>Coverage applies to a maximum of \$1 million of purchase payments. Withdrawals will reduce the gain on a dollar for dollar basis and may significantly reduce or eliminate the value of the rider. Certain conditions, restrictions and limitations are associated with the rider. There may be no benefit if there are no earnings or consistently negative rates of return. The annual rate used to calculate your rider charge will increase as you age and could cause your rider charge to also increase. This increase could be significant. Please carefully examine the features and benefits of the rider to ensure that it meets your needs.</p> |
| Death Benefit | If the optional Wealth Transfer Benefit Rider is not elected, the benefit is the contract value. |

| Fund | Net Total Annual Portfolio Expenses ¹ | Asset Class |
|---|--|-------------------------|
| Symetra Mutual Funds Trust | | |
| Symetra DoubleLine® Emerging Markets Income Fund | 0.98% | Emerging Markets Bond |
| Symetra DoubleLine® Total Return Fund | 0.63% | Intermediate Term Bond |
| Symetra Yacktman Focused Fund | 1.07% | Large Cap Value |
| AllianceBernstein Variable Products Series Fund, Inc. | | |
| AllianceBernstein VPS Real Estate Investment Portfolio Class A | 0.84% | Real Estate |
| AllianceBernstein VPS Small Cap Growth Portfolio Class A ^A | 1.18% | Small Cap Growth |
| AllianceBernstein VPS Small/Mid Cap Value Portfolio Class A | 0.82% | Mid Cap Value |
| ALPS Variable Investment Trust | | |
| ALPS/Alerian Energy Infrastructure Portfolio | 0.80% | Energy |
| American Century® Variable Portfolios, Inc. | | |
| American Century® VR Mid Cap Value Fund | 1.01% | Mid Cap Value |
| American Century® VP Value Fund | 0.98% | Large Cap Value |
| American Funds Insurance Series | | |
| American Funds Insurance Series Global Growth & Income Fund | 0.61% | World Stock |
| American Funds Insurance Series Growth-Income Fund | 0.28% | Large Cap Blend |
| American Funds Insurance Series Growth Fund | 0.34% | Large Cap Growth |
| American Funds Insurance Series International Fund | 0.53% | Foreign Large Cap Blend |
| American Funds Insurance Series New World Fund | 0.78% | Emerging Markets |
| BlackRock Variable Series Fund, Inc. | | |
| BlackRock Capital Appreciation V.I. Fund | 0.80% | Large Cap Growth |
| BlackRock Global Allocation V.I. Fund | 0.76% | World Allocation |
| BlackRock High Yield V.I. Fund | 0.79% | High Yield Bond |
| Calvert Variable Products, Inc. | | |
| Calvert VP EAFE International Index Portfolio (P) | 0.96% | Foreign Large Cap Blend |
| Calvert VP Russell 2000 Small Cap Index Portfolio (P) | 0.75% | Small Cap Blend |
| Columbia Funds Variable Insurance Trust | | |
| Columbia VP Income Opportunities Fund | 0.71% | High Yield Bond |
| Columbia VP International Opportunity Fund | 0.99% | Foreign Large Cap Blend |
| Columbia VP Mid-Cap Growth Opportunity Fund | 0.87% | Mid Cap Growth |
| Columbia VP Small Cap Value Fund | 0.88% | Small Cap Value |
| Delaware VIP® Trust | | |
| Delaware VIP Emerging Markets Series, Standard Class | 1.40% | Emerging Markets |
| Delaware VIP International Value Equity Series, Standard Class | 1.07% | Foreign Large Cap Value |
| Delaware VIP Small Cap Value Series, Standard Class | 0.81% | Small Cap Value |
| Delaware VIP Small Cap Growth Series, Standard Class | 0.84% | Mid Cap Growth |

^A Open only to contract owners who have been continuously invested since January 31, 2013.

Investment Choices

Symetra True Variable Annuity

| Fund | Net Total Annual Portfolio Expenses ¹ | Asset Class |
|--|--|---------------------------|
| Dimensional Fund Advisors | | |
| DFA VA Global Bond Portfolio | 0.29% | World Bond |
| DFA VA International Small Portfolio | 0.63% | Foreign Small and Mid Cap |
| DFA VA International Value Portfolio | 0.50% | Foreign Large Cap Value |
| DFA VA Short-Term Fixed Portfolio | 0.30% | Short Term Bond |
| DFA VA US Large Value Portfolio | 0.30% | Large Cap Value |
| DFA VA US Targeted Value | 0.41% | Small Cap Value |
| Dreyfus Variable Investment Fund ("Dreyfus VIF") | | |
| Dreyfus VIF Appreciation Portfolio – Initial Shares | 0.81% | Large Cap Blend |
| DWS Variable Series | | |
| DWS Alternative Asset Allocation VIP A | 1.60% | Multi-Alternative |
| Fidelity® Variable Insurance Products | | |
| Fidelity VIP Contrafund® Portfolio – Initial Class | 0.64% | Large Cap Growth |
| Fidelity VIP Financial Services – Initial Class | 0.92% | Financials |
| Fidelity VIP Investment Grade Bond Portfolio – Initial Class | 0.42% | Intermediate Term Bond |
| Fidelity VIP Mid Cap Portfolio – Initial Class | 0.65% | Mid Cap Growth |
| Fidelity VIP Real Estate – Initial Class | 0.70% | Real Estate |
| Fidelity VIP Energy – Initial Class | 0.69% | Energy |
| Fidelity VIP Strategic Income – Initial Class | 0.69% | Multi-Sector Bond |
| Fidelity VIP Technology – Initial Class | 0.71% | Technology |
| Franklin Templeton Variable Insurance Products Trust | | |
| Franklin Income Securities Fund – Class 1 | 0.47% | Conservative Allocation |
| Franklin Rising Dividends Securities Fund | 0.63% | Large Cap Blend |
| Franklin Strategic Income Securities Fund | 0.59% | Multi-Sector Bond |
| Franklin U.S. Government Fund | 0.50% | Government Bond |
| Mutual Global Discovery Securities Fund | 0.99% | World Stock |
| Mutual Shares Securities Fund – Class 1 | 0.71% | Large Cap Value |
| Templeton Developing Markets Securities Fund | 1.35% | Emerging Markets |
| Templeton Foreign Securities | 0.79% | Foreign Large Cap Value |
| Templeton Global Bond Securities Fund | 0.55% | World Bond |
| AIM Variable Insurance Funds (Invesco Variable Insurance Funds) | | |
| Invesco V.I. Core Equity Fund | 0.90% | Large Cap Blend |
| Invesco V.I. Balanced-Risk Allocation Fund | 0.80% | World Allocation |
| Invesco V.I. Global Real Estate Fund | 1.14% | Global Real Estate |
| Invesco V.I. International Growth Fund | 1.01% | Foreign Large Cap Growth |
| Invesco V.I. Mid Cap Core Equity Fund | 1.05% | Mid Cap Blend |
| Invesco V.I. Small Cap Equity Fund | 1.06% | Small Cap Blend |
| Invesco V.I. Comstock Fund | 0.78% | Large Cap Value |

Investment Choices

Symetra True Variable Annuity

| Fund | Net Total Annual Portfolio Expenses ¹ | Asset Class |
|---|--|--------------------------|
| Janus Aspen Series | | |
| Janus Aspen Enterprise Portfolio | 0.69% | Mid Cap Growth |
| Janus Aspen Flexible Bond Portfolio | 0.55% | Intermediate Term Bond |
| Janus Aspen Overseas Portfolio | 0.49% | Foreign Large Cap Blend |
| Janus Aspen Perkins Mid Cap Value Portfolio | 0.58% | Mid Cap Value |
| JPMorgan Insurance Trust | | |
| JPMorgan Insurance Trust Mid Cap Value Portfolio | 0.90% | Mid Cap Value |
| Merger Fund VL | | |
| Merger Fund VL | 1.40% | Market Neutral |
| MFS® Variable Insurance Trust | | |
| MFS® Growth Series | 0.82% | Large Cap Growth |
| MFS® Government Securities Portfolio | 0.60% | Government Bond |
| MFS® International Growth Portfolio | 1.04% | Foreign Large Cap Growth |
| MFS® International Value Portfolio | 0.98% | Foreign Large Cap Value |
| MFS® New Discovery Portfolio | 0.97% | Small Cap Growth |
| MFS® Utilities Series | 0.82% | Utilities |
| PIMCO Variable Insurance Trust | | |
| PIMCO All Asset Portfolio Institutional | 1.09% | World Allocation |
| PIMCO CommodityRealReturn® Strategy Portfolio Institutional | 0.85% | Commodities |
| PIMCO Emerging Markets Bond Portfolio Institutional | 0.85% | Emerging Markets Bond |
| PIMCO EqS Pathfinder Portfolio™ Institutional | 0.99% | World Stock |
| PIMCO Foreign Bond Portfolio (Unhedged) Institutional | 0.79% | World Bond |
| PIMCO Global Bond Portfolio (Unhedged) Institutional | 0.76% | World Bond |
| PIMCO Global Multi-Asset Portfolio Institutional | 1.00% | World Allocation |
| PIMCO Long-Term U.S. Government Portfolio Institutional | 0.52% | Government Bond |
| PIMCO Low Duration Portfolio Institutional | 0.50% | Short Term Bond |
| PIMCO Real Return Portfolio Institutional | 0.55% | Inflation Protected Bond |
| PIMCO Total Return Portfolio Institutional | 0.50% | Intermediate Term Bond |
| PIMCO Unconstrained Bond Portfolio Institutional | 0.90% | Multi-Sector Bond |
| Pioneer Variable Contracts Trust | | |
| Pioneer Fund VCT Portfolio | 0.74% | Large Cap Blend |
| Pioneer Strategic Income VCT Portfolio | 1.27% | Multi-Sector Bond |
| Royce Capital Fund | | |
| Royce Capital Fund – Micro-Cap Portfolio | 1.33% | Small Blend |
| Royce Capital Fund – Small-Cap Portfolio | 1.06% | Small Blend |

Investment Choices

Symetra True Variable Annuity

(P) Denotes a passive index portfolio

| Fund | Net Total Annual Portfolio Expenses ¹ | Asset Class |
|---|--|--------------------------|
| Sentinel Variable Products Trust | | |
| Sentinel VP Bond Fund | 0.63% | Intermediate Term Bond |
| Sentinel VP Common Stock Fund | 0.70% | Large Cap Blend |
| Sentinel VP Small Company Fund | 0.75% | Small Cap Growth |
| T. Rowe Price Variable Insurance Portfolios | | |
| T. Rowe Price Blue Chip Growth Portfolio | 0.85% | Large Cap Growth |
| T. Rowe Price Equity Income Portfolio | 0.85% | Large Cap Value |
| T. Rowe Price Health Sciences Portfolio | 0.95% | HealthCare |
| T. Rowe Price International Stock Portfolio | 1.05% | Foreign Large Cap Growth |
| T. Rowe Price New America Growth Portfolio | 0.85% | Large Cap Growth |
| Van Eck Variable Insurance Products Trust | | |
| Van Eck VIP Global Hard Assets | 1.03% | Natural Resources |
| Van Eck VIP Multi-Manager Alternatives | 2.95% | Multi-Alternative |
| Vanguard® Variable Insurance Fund Portfolios | | |
| Vanguard VIF – Balanced Portfolio | 0.26% | Balanced |
| Vanguard VIF – Capital Growth Portfolio | 0.41% | Large Cap Growth |
| Vanguard VIF – Equity Income Portfolio | 0.33% | Large Cap Value |
| Vanguard VIF – Equity Index Portfolio (P) | 0.17% | Large Cap Blend |
| Vanguard VIF – High Yield Bond Portfolio | 0.29% | High Yield Bond |
| Vanguard VIF – International Portfolio | 0.49% | Foreign Large Cap Growth |
| Vanguard VIF – Mid-Cap Index Portfolio (P) | 0.26% | Mid Cap Blend |
| Vanguard VIF – Money Market | 0.06% | Money Market |
| Vanguard VIF – REIT Index Portfolio (P) | 0.28% | Real Estate |
| Vanguard VIF – Short-Term Investment-Grade Portfolio | 0.20% | Short Term Bond |
| Vanguard VIF – Small Company Growth Portfolio | 0.38% | Small Cap Growth |
| Vanguard VIF – Total Bond Market Index Portfolio (P) | 0.20% | Intermediate Term Bond |
| Vanguard VIF – Total Stock Market Index Portfolio (P) | 0.18% | Large Cap Blend |
| Virtus Variable Insurance Trust | | |
| Virtus International Series | 0.94% | Foreign Large Cap Blend |
| Virtus Multi-Sector Fixed Income Series | 0.69% | MultiSector Bond |
| Virtus Premium AlphaSector Series | 1.65% | Large Cap Blend |
| Virtus Real Estate Securities Series | 0.91% | Real Estate |
| Virtus Small-Cap Growth Series | 0.95% | Small Cap Growth |

* Information as of May 1, 2013

Before investing, carefully consider the investment objectives, risks, charges and expenses. This and other information is contained in the contract prospectus and the underlying portfolio prospectuses. Please call or write your Registered Representative or Symetra for free copies of the prospectuses or visit www.symetra.com for online copies and read them carefully before investing.

An investment in the Money Market Portfolio is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency. Although the Portfolio seeks to preserve the value of your investment at \$1.00 per share, it is possible to lose money by investing in the Portfolio.

Securities are offered through Symetra Securities, Inc. (SSI). Symetra True Variable Annuity is a flexible premium deferred variable annuity issued by Symetra Life Insurance Company (SLIC). Contract form number is ICC12_RC1 and WTB rider form number is ICC12_RE1 in most states and is not available in all states or any U.S. territory. SSI and SLIC are affiliates and are both located at 777 108th Avenue NE, Suite 1200, Bellevue, WA 98004-5135.

Guarantees and benefits are subject to the claims-paying ability of Symetra Life Insurance Company.

Withdrawals may be subject to federal income taxes and a 10% IRS early withdrawal tax penalty may also apply for amounts taken prior to age 59½. Consult your attorney or tax advisor for more information.

Variable annuities, which are suitable for long-term investing, are subject to market risks, including the potential loss of principal invested.

Funds in which the sub-accounts invest may have their own policies and procedures regarding short-term investments and may impose fees or restrictions on short-term trading. If these fees apply, they will be deducted from the Contract Value.

There are special risks associated with investing in certain underlying funds. Examples may include small company, geographic, international, emerging markets and sector focus. See the prospectus(es) before investing.

The PIMCO All Asset Portfolio – Institutional Class is a “fund of funds” and is subject to the risks of the underlying funds, including the volatility of the financial markets in the U.S. and abroad, as well as the additional risks associated with investing in high yield, small-cap, and foreign securities.

While nonqualified annuities offer the added benefit of tax deferral, in the case of qualified annuities, the tax deferral is provided by the retirement plan itself. The investor should focus on the benefits offered by a variable annuity to assess if a variable annuity is right for them.

DoubleLine® is a registered trademark of DoubleLine Capital LP.

Vanguard is a trademark of The Vanguard Group, Inc.

¹ Waivers or expense reimbursements may change and are subject to fund company board approval. Expenses are as of the most recent prospectus.

Minimum trigger is a 5% increase or decrease. Automated Sell Strategy orders will expire after 18 months.

³ Symetra Life Insurance Company does not provide investment advice.



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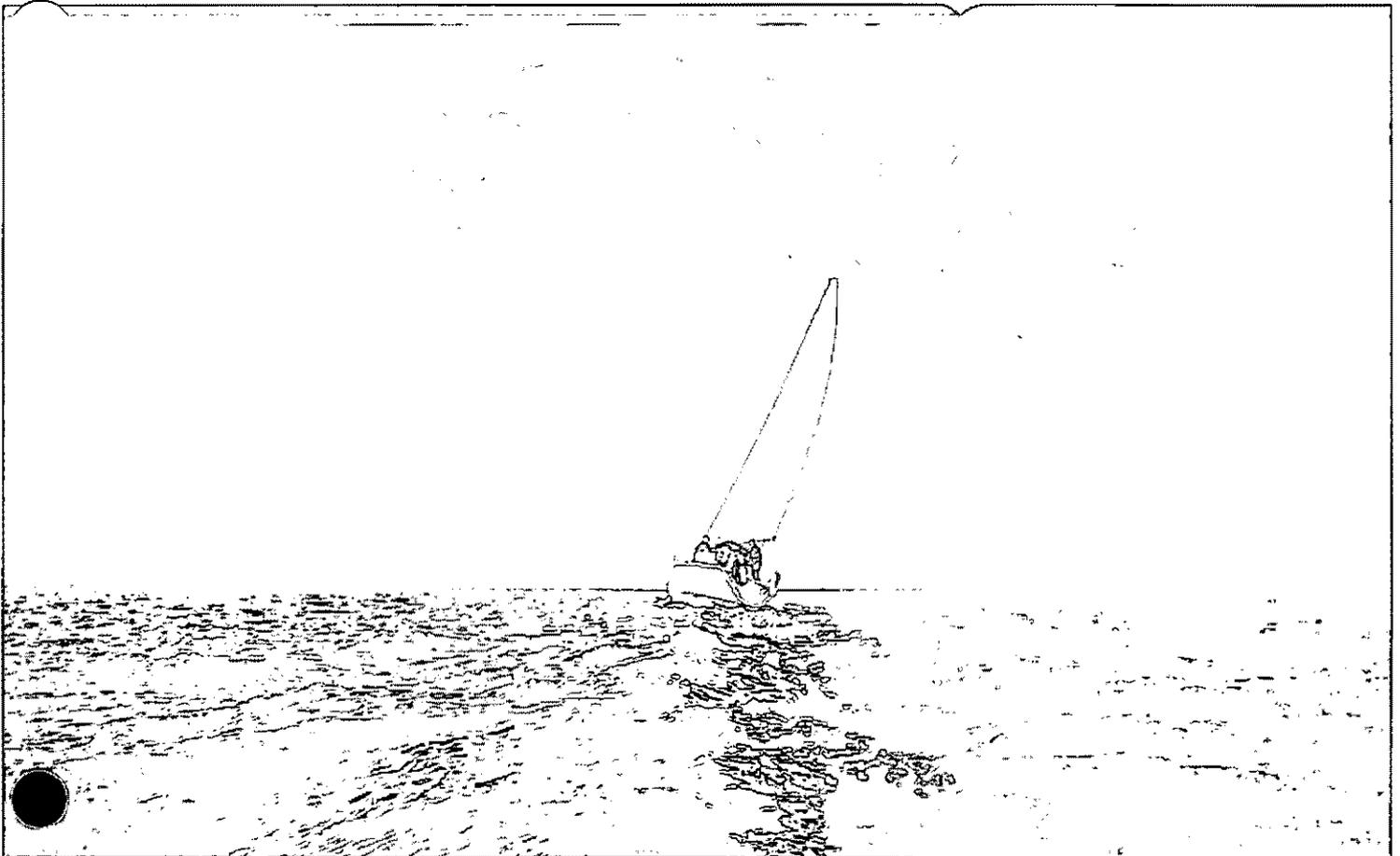
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C. H. J.



Quality portfolios, flexible access

Symetra Spinnaker® Variable Annuity



| | | |
|--|--|----------------|
| Not a bank or credit union deposit or obligation | Not insured by any federal government agency | |
| Not FDIC or NCUA/NCUSIF insured | Not guaranteed by any bank or credit union | May lose value |

Maximize your growth potential

Spinnaker Variable Annuity offers more than 60 quality portfolio options from money managers you know and trust, like American Century, Fidelity® Investments, Franklin Templeton and Pioneer Investments.



How variable annuities work

Variable annuities are long-term insurance products designed to build retirement income through tax-deferred growth.

- They're tied to market performance, so they have the most growth potential, and also the most risk. Consider them for the longer term, more aggressive part of your retirement savings plan.
- You choose how your money is allocated.
- You can receive guaranteed retirement income—for life or a specified period of time.

Spinnaker features:

- Over 60 quality portfolio options
 - Optional asset allocation models
 - Flexible income options
-

Reasons to choose Spinnaker

Four simple ways to access your money

- ➊ **Immediate** free withdrawals of up to 10% of the contract value per contract year.
- ➋ **Free withdrawals** after 30 days confinement in a hospital or nursing home.
- ➌ **Convert your assets** into an income stream after the first year, with no surrender charges. You can do this until your 96th birthday.
- ➍ **Our Systematic Withdrawal Income Plan (SWIP®)**—backed by our President's Guarantee—allows you to take distributions based on your life expectancy without premature IRS penalties.

President's Guarantee

Symetra guarantees that your retirement plan distributions such as SWIP payments or Required Minimum Distributions, are calculated to satisfy the guidelines and requirements established by the IRS. If we make a mistake, we will pay any resulting penalty.

This assurance is based on the assumption that all information provided to us is complete and accurate.

Surrender Charges

Withdrawals and accompanying surrender charges will reduce the contract value and death benefit.

| Year | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
|--------|----|----|----|----|----|----|----|----|----|
| Charge | 8% | 7% | 6% | 5% | 4% | 3% | 2% | 1% | 0% |

Mortality & Expense Risk Charge: 1.25%

Annual Administration Maintenance Charge: \$30 (waived if account value is greater than or equal to \$50,000)

Asset-Related Administration Charge: .15%

Before investing, carefully consider the investment objectives, risks, charges and expenses. This and other information is contained in the contract prospectus and the underlying portfolio prospectuses. You may call or write your Registered Representative or Symetra for free copies of the prospectuses or visit www.symetra.com for an online copy. Please read carefully before investing.

Spinnaker Variable Annuity is a flexible premium deferred annuity issued by Symetra Life Insurance Company. Contract form number in most states is LPC-1175 2/04. In Oregon, the contract form number is LPC-1175/OR 5/05. Not available in all U.S. states or any U.S. territory.

Securities are offered through Symetra Securities, Inc. (SSI). Variable annuities are issued by Symetra Life Insurance Company (SLIC) and are not available in all U.S. states or any U.S. territory. SSI and SLIC are affiliates and are both located at 777 108th Avenue NE, Suite 1200, Bellevue, WA 98004-5135.

Guarantees and benefits are subject to the claims-paying ability of Symetra Life Insurance Company.

Variable annuities, which are suitable for long-term investing, are subject to market risks, including the potential loss of principal invested.

Withdrawals may be subject to federal income tax and a 10% IRS early withdrawal tax penalty may also apply for amounts withdrawn prior to age 59½. Consult your attorney or tax advisor for more information.

The Nursing Home and Hospitalization Waiver is not available in all states. Surrender charges are waived after 30 days of confinement in a nursing home or hospital, and up to 60 days after release. There is a one-year waiting period if already confined in a hospital or nursing home on the first contract day.

Systematic Withdrawal Income Plan (SWIP) is only available for qualified contracts and allows penalty free withdrawals from retirement plans before age 59½.

Products and services vary by distributor.

Fidelity Investments® is a registered trademark of FMR Corp.



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www.symetra.com

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Symetra Spinnaker®

Variable Annuity



Spinnaker offers quality portfolios and flexible options to access your money.

Basics

| | |
|---|--|
| Client Profile | Disciplined investor comfortable with longer surrender charge periods |
| Maximum Issue Age | 85 |
| Product Type | Flexible premium |
| Minimum Initial Purchase Payment | <ul style="list-style-type: none"> • \$30 qualified. \$1,000 minimum initial purchase payment in Maine and South Carolina • \$2,000 nonqualified • \$100 for systematic investing |
| Subsequent Purchase Payments | <ul style="list-style-type: none"> • \$30 qualified • \$250 nonqualified • \$100 for systematic investing |
| First Year Additional Interest | Yes, for purchase payments greater than \$100,000. Additional interest is credited to payments that are allocated to the fixed account only. |
| Guaranteed Interest Periods | <ul style="list-style-type: none"> • 1 year • 3 year (for initial purchase payments only) • 5 year (for initial purchase payments only) <p>Interest rate may be adjusted after the completion of the initial guarantee period. If selecting the 3 or 5 year initial guaranteed interest period, your initial purchase payment must be at least \$1,000.</p> |
| Variable Portfolio Options | 61 |
| Fixed Account Guaranteed Minimum Interest Rate | 2.00% for the first eight Contract Years, 1.50% thereafter. |
| Contingent Deferred Sales Charges (CDSC) | Contract based 8-year decreasing schedule: 8%, 7%, 6%, 5%, 4%, 3%, 2%, 1% |
| Mortality & Expense Risk Charge | 1.25% |
| Annual Administration Maintenance Charge | \$30 (waived if contract value is greater than or equal to \$50,000) |
| Asset Related Administration Charge | .15% |
| Total Investment Management & Other Fees | Range between 0.49% and 1.71%; after any waivers or expense reimbursements. Range between 0.49% and 1.76% prior to waivers and expense reimbursements. Waivers or expense reimbursements may change at anytime and are subject to fund company board approval. (Fee range is based on active portfolios which are available to all contract owners.) |

| | |
|--|--|
| Not a bank or credit union deposit or obligation | Not insured by any federal government agency |
| Not FDIC or NCUA/NCUSIF insured | Not guaranteed by any bank or credit union |
| | May lose value |

Options

| | |
|--|---|
| Asset Allocation Models | Created by Symetra Investment Management, Inc. exclusively for Symetra Spinnaker Variable Annuity |
| Dollar Cost Averaging Program | Dollar Cost Averaging involves continuous investment in securities regardless of fluctuating prices. Dollar Cost Averaging does not, however, assure a profit or prevent a loss in declining markets. An investor should consider his/her ability to continue investing during low price levels. |
| Portfolio Rebalancing Program | \$10,000 minimum contract value |
| Appreciation/Interest Sweep Program | Automatically transfer earnings up to 10% during each contract year from the Fidelity® VIP Money Market Portfolio and earned interest up to 10% from the Symetra Fixed Account to the other portfolios monthly, quarterly, or annually. Cannot be used to transfer money to the Symetra Fixed Account or to the Fidelity VIP Money Market Portfolio. Minimum contract value \$10,000. |
| Transfers | Your first 12 transfers per contract year are free. After that, there is a transfer charge equal to \$10 or 2% of the amount transferred, whichever is less. If transferring from the Symetra Fixed Account, you are limited to 10% of the fixed account value per contract year. The minimum dollar amount to transfer into any investment option is \$50. The minimum dollar amount you can transfer out of any investment option is \$500 or the portfolio balance, whichever is less. |

Access

Income Options

Some income options may be available only at the end of the surrender charge period.

- Systematic withdrawal programs
- Annuitization
- Fixed and variable annuity payments
 - Single Life, with or without Period Certain
 - Joint and Survivor Life
 - Joint and Survivor Life with Period Certain
 - Period Certain, 5-year minimum
 - Payments Based on a Number of Years: This option is only available after the eighth contract year and if the contract value is \$25,000 or more at the time this option is selected.

CDSC Free Withdrawal Provisions

- 10% per contract year
 - Nursing home & hospitalization waiver
- Confinement period may differ in some states. If you are confined to a hospital or nursing home on the contract date, you are not eligible for this waiver until after the first contract year.

Withdrawal Charge

First withdrawal per contract year is free; thereafter it is \$25 or 2% of the amount withdrawn, whichever is less. Fee is waived with electronic transfer options.

Before investing, carefully consider the investment objectives, risks, charges and expenses. This and other information is contained in the contract prospectus and the underlying portfolio prospectuses. Please call or write your Registered Representative or Symetra for free copies of the prospectuses or visit www.symetra.com for online copies and read them carefully before investing.

An investment in the Money Market Portfolio is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency. Although the Portfolio seeks to preserve the value of your investment at \$1.00 per share, it is possible to lose money by investing in the Portfolio.

Securities are offered through Symetra Securities, Inc. (SSI). Spinnaker Variable Annuity is a flexible premium variable deferred annuity issued by Symetra Life Insurance Company (SLIC). Contract form numbers for Spinnaker in most states are LPC-1175 2/04, LPC-1175/OR 5/05 (Oregon), LPC-1526 5/05 (457). Not available in all U.S. states or any U.S. territory. SSI and SLIC are subsidiaries of Symetra Financial Corporation. All located at 777 108th Ave NE, Suite 1200, Bellevue, WA 98004. Each company is responsible for its own financial obligations.

Annuity contracts have terms and limitations for keeping them in force. Please contact your insurance professional for complete details.

Guarantees and benefits are subject to the claims-paying ability of Symetra Life Insurance Company.

Withdrawals may be subject to federal income tax and a 10% IRS early withdrawal tax penalty may also apply to amounts withdrawn prior to age 59½. Consult your attorney or tax advisor for more information.

Variable annuities, which are suitable for long-term investing are subject to market risks, including the potential loss of principal invested.

While non-qualified annuities offer the added benefit of tax deferral, in the case of qualified annuities, the tax deferral is provided by the retirement plan itself. The investor should focus on the benefits offered by a variable annuity to assess if a variable annuity is right for them.

Asset allocation does not assure a profit or prevent a loss.



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Symetra VCOLI/VCOLI X

Private Placement Variable Life Insurance

Basic Features

| | |
|------------------------------|---|
| Target Market | Employer and employer-sponsored trusts for tax-favored employee benefit financing or benefit expense offset. Client must be an Accredited Investor and Qualified Purchaser under federal securities laws. |
| Minimum Case Size | \$1 million in annual premium |
| Issue Guidelines | <ul style="list-style-type: none"> • Guaranteed issue only • Ages 20-65 (age last birthday as of effective date) • Top 35% of paid employees • An employee for at least last 90 days • Actively at work for at least 30 hours per week for 90 days, including effective date of the policy |
| Issue Classes | Male, Female Nicotine/Non-Nicotine |
| Minimum Lives | Subject to net amount at risk limits: 10 lives for traditional mortality and 50 lives for experience rated mortality. |
| Policy Date | No Maturity Date |
| Insurance Test | Guideline Premium Test (GPT) or Cash Value Accumulation Test (CVAT) |
| Death Benefit Options | Option A (fixed), Option B (increasing) and Option C (return of premium) |

Investment Options

| | |
|-----------------------------|--|
| Investment Divisions | Broad array of registered subaccounts. List available upon request. |
| Fixed Account | <ul style="list-style-type: none"> • Minimum Guaranteed Interest Rate of 1%. • Transfers out of fixed account are limited to one per policy year, and up to 20% of the cash value held in the fixed account. |

Additional Features

| | |
|-------------------------------------|---|
| Experience Rating | <ul style="list-style-type: none"> • Conservative design approach: Claims Stabilization Reserve (CSR) balance zeroed out annually and no claw-back if reserve is exceeded during a policy year. • Available for cases with 50 or more insureds. • CSR will be held in Symetra Fixed Account or in Fidelity VIP Money Market Portfolio (selected at issue). |
| Cash Value Enhancement Rider | <p>Included to lessen the impact of upfront sales load on policy performance in the early years. Cash Value Enhancement amount paid out in the event of a full surrender. Not paid out for loans, withdrawals or 1035 exchanges.</p> <ul style="list-style-type: none"> • Included upon request without charge. • Enhancement account will grow at 4%, which is locked in at issue. |
| Change of Insured | <ul style="list-style-type: none"> • Ability to replace one insured person for another eligible person on an existing policy. • Included automatically without charge. |

Continued on back

Charges

| | |
|--|---|
| Cost of Insurance Charges | Guaranteed 2001 CSO Ultimate |
| Premium Tax & Premium Charge (DAC Tax) | Amortized through M&E over 25 years or offset by cash value enhancement. |
| Sales Load | Percent of premium or amortized through M&E over 25 years. |
| Administration Expense | \$5.00 per month |
| Surrender Charge | If surrendered for cash, surrender charges are waived. Charges for 1035 exchanges are stated in the policy and decline over time to recover amounts amortized through M&E. |
| Commission | <ul style="list-style-type: none">• Premium-based and asset-based commission available.• Renewal commissions: a portion will be set aside as Service Fees (5-15bps) for payment of ongoing COLI servicing—after issue can be redirected by client or carrier.• Chargebacks: For policy terminations for reasons other than death:<ul style="list-style-type: none">Level Commission: During first 3 policy years, 100% charge back of any premium based commission paid in the year of termination.Standard Commission: Policy Years 1-3, cumulative premium based commission is subject to charge-backs of 100%, 70% and 40%, respectively. |

Before investing, clients should carefully consider the investment objectives, risks, charges, and expenses. This and other information is contained in the private placement memorandum and the underlying portfolio prospectuses. Clients should read them carefully before investing.

Private Placement Flexible Premium Variable Adjustable life insurance, which is suitable for long-term investing, is subject to market risks, including the potential loss of principal invested. Investment return and principal value will fluctuate, and units or shares, when redeemed, may be worth more or less than their original cost.

Securities are offered through Symetra Securities, Inc. (SSI). Variable life insurance is issued by Symetra Life Insurance Company (SLIC) and is not available in all U.S. states or any U.S. territories. SSI and SLIC are affiliates and are both located at 777 108th Avenue NE, Suite 1200, Bellevue, WA 98004-5135.

Symetra VCOLI/VCOLI X is a Private Placement Variable Adjustable Life Insurance policy. The policy form number is ICC11_LC7 in most states.

Clients should be aware that the crediting rate for amounts in the Symetra Fixed Account could drop to the Guaranteed Minimum Interest Rate shown on the policy coverage description.

Withdrawals may be subject to federal income tax and a 10% IRS early withdrawal tax penalty may also apply to amounts withdrawn prior to age 59½. Have clients consult their attorney or tax advisor for more information.

A rider is a provision of the life insurance policy with benefits and features that should never be confused with the life insurance policy itself. Before evaluating the benefits of a rider, carefully examine the life insurance policy to which it is attached.

Guarantees and benefits are subject to the claims-paying ability of Symetra Life Insurance Company.



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