

Holding Company Form B

Applicant Name: Symetra National Life Insurance Company

NAIC No. 90581

FEIN: 91-1079693

Item 7 –Holding Company Form “B” Registration Statement

The following exhibits have been submitted in connection with the UCAA Primary Application filed by Applicant’s affiliate, Symetra Life Insurance Company, as Exhibits 7-A and 7-B, and are incorporated into this application as Item 7 by reference:

2012 Annual Form B Insurance Holding Company System Registration Statement as of December 31, 2012 filed with the Washington State Office of the Insurance Commissioner by Symetra Life Insurance Company on behalf of itself and Symetra National Life Insurance Company

Amendment No. 1 to 2012 Annual Form B Insurance Holding Company System Registration Statement as of November 13, 2013 filed with the Washington State Office of the Insurance Commissioner by Symetra Life Insurance Company on behalf of itself and Symetra National Life Insurance Company

Statutory Membership

Applicant Name: Symetra National Life Insurance Company

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Item 8 – Statutory Memberships

Applicant will become a member of the Iowa Life and Health Insurance Guaranty Association upon becoming licensed to transact business in Iowa.

**SEC Filings or Consolidated GAAP
Financial Statement**

Applicant Name: Symetra National Life Insurance Company

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Item 9 – SEC Filings or Consolidated GAAP Financial Statement

Symetra National Life Insurance Company (“Applicant”) is a direct, wholly-owned subsidiary of Symetra Life Insurance Company (“Symetra Life”). Symetra Life is a direct, wholly-owned subsidiary of Symetra Financial Corporation (“Symetra Financial”), a publicly traded holding company (NYSE: SYA). Symetra Financial filed a registration statement on Form S-1 with the Securities and Exchange Commission (SEC) on January 15, 2010 in connection with a public offering. The registration statement is available electronically from the SEC at: <http://www.sec.gov/Archives/edgar/data/1403385/000095012310003041/v53541a6sv1za.htm>. All supplements and amendments thereto, as well as each of Symetra Financial’s filings on Form 8-K, 10-K and 10-Q are also available electronically from the SEC at: <http://www.sec.gov/cgi-bin/browse-edgar?CIK=sya&owner=exclude&action=getcompany>.

Debt to Equity Ratio Statement

Applicant Name: Symetra National Life Insurance Company

NAIC No. 90581
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Item 10 – Debt to Equity Ratio Statement

A Debt to Equity Ratio Statement has been submitted in connection with the UCAA Primary Application filed by applicant's affiliate, Symetra Life Insurance Company, and is incorporated into this application by reference.

Custody Agreements

Item 11 – Custody Agreements

Excluding items shown in the Schedules of Special and Other Deposits in the applicant's Annual Statement, real estate, mortgage loans and investments held physically in the Applicant's offices, vaults or safety deposit boxes, all stocks, bonds and other securities, are held pursuant to a custodial agreement with JP Morgan Chase. The written agreement includes appropriate safeguards for the handling of the securities, in accordance with those specified in the NAIC Financial Examiners' Handbook.

Prior to effectuating the redomestication, the applicant will engage with JP Morgan Chase to amend its in-force custody agreements to comply with Iowa Code § 511.8 and implementing regulations.

Copies of the applicant's in-force custody agreements are included with Item 11:

Exhibit 11-A Domestic Custody Agreement between Symetra National Life Insurance Company and JPMorgan Chase Bank, N.A., dated December 22, 2011

Exhibit 11-B Global Custody Rider between Symetra National Life Insurance Company and JPMorgan Chase Bank, N.A., dated December 22, 2011