Evolving Trends in Bank-Owned Life Insurance

Complimentary Edition – 2026-Q1

June 2026

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Economic Backdrop

Economic Updates

Federal Reserve & Yield Curve

- The Fed held rates at its two meetings during the quarter, but treasury yields rose overall.

Sector Returns

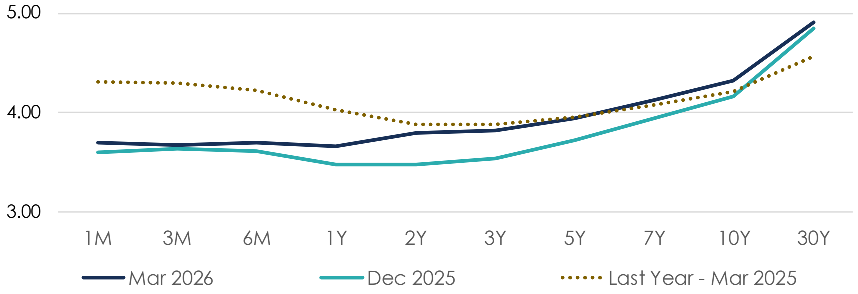
- The US/Iran conflict elicited heightened volatility during the quarter
- While underperforming by 28bps in March, Agency MBS outperformed like-duration treasuries by 16bps in Q1
- The S&P 500 gave back some of it's strong 2025, falling -4.33%, despite the energy sector returning over 38%
  - Consumer Discretionary, IT, and Financial Sectors of the index each fell over 9%

US Economy

- High gas prices stemming from the Iran conflict slowed consumer spending, but Real GDP growth hit 2%, an increase from 2025 backed by heavy business spending on AI technologies
- Mortgage rates in the US increased slightly to 6.48% from 6.25%

Financial Markets Update

US Treasury Yields



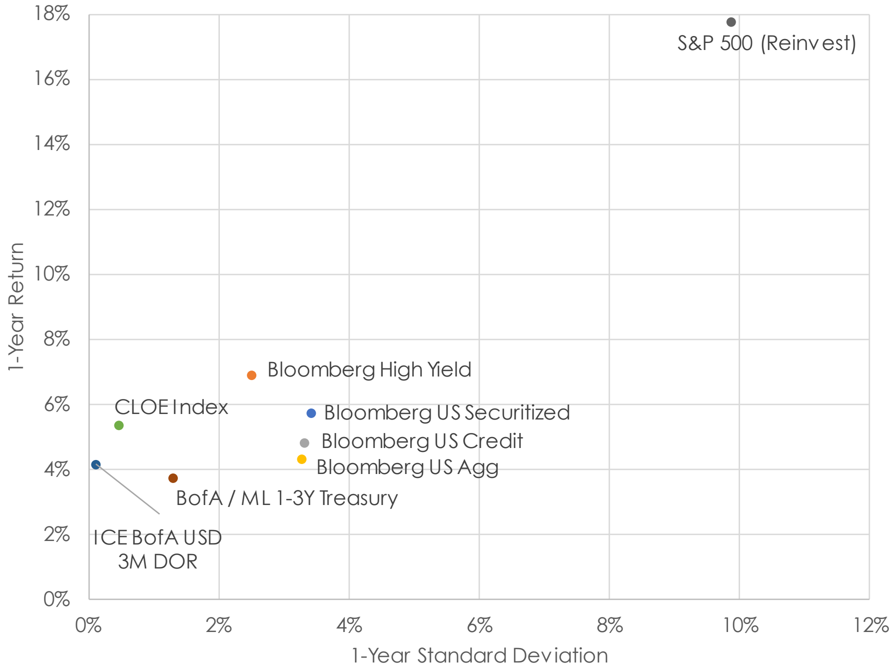
	1M	3M	6M	1Y	2Y	3Y	5Y	7Y	10Y	30Y
Mar 2026	3.69	3.68	3.70	3.66	3.80	3.82	3.94	4.13	4.32	4.91
Dec 2025	3.60	3.63	3.61	3.48	3.48	3.54	3.73	3.94	4.17	4.85
Q Change	0.10	0.04	0.09	0.19	0.32	0.28	0.22	0.19	0.15	0.07
Mar 2025	4.31	4.30	4.23	4.03	3.89	3.88	3.95	4.08	4.21	4.57
Year Change	-0.61	-0.62	-0.53	-0.37	-0.09	-0.06	-0.01	0.06	0.11	0.34

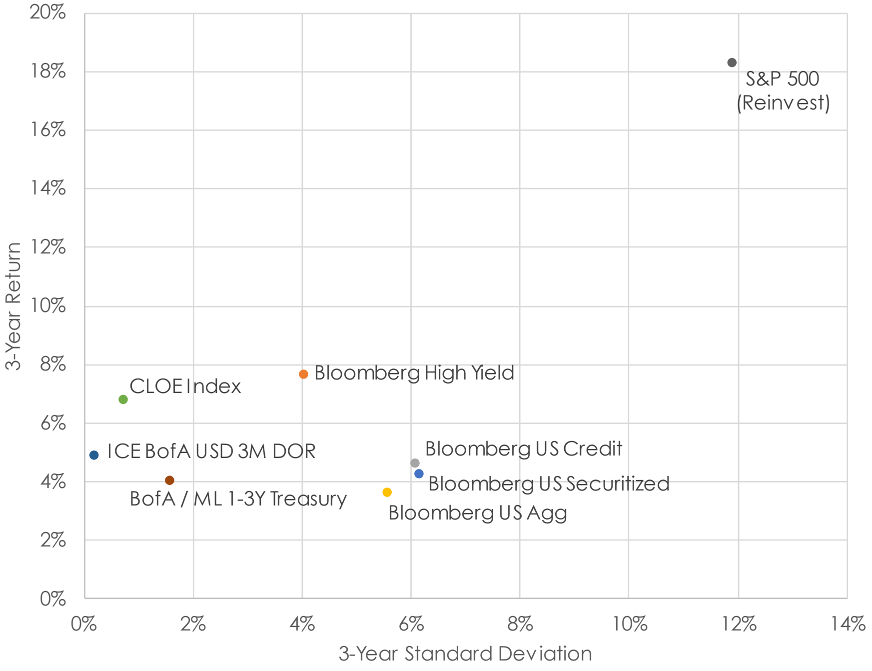
Sector Performance (As of Q1)

	YTW	Duration	OAS	3M Return	12M Return	3Y Return	5Y Return
Treasuries	4.14%	5.82	0.01%	-0.04%	3.25%	2.59%	-0.14%
Corporate	5.14%	6.78	0.89%	-0.54%	4.78%	4.70%	0.76%
CMBS	4.65%	3.79	0.71%	0.31%	5.39%	5.42%	1.46%
ABS	4.40%	2.80	0.53%	0.31%	4.66%	4.96%	2.38%
Credit Card ABS	4.17%	2.40	0.33%	0.31%	4.60%	4.96%	1.87%
Auto ABS	4.35%	1.76	0.55%	0.48%	4.71%	5.24%	2.59%
Agency MBS	4.83%	5.36	0.24%	0.40%	5.79%	4.17%	0.45%
GNMA	4.89%	5.10	0.22%	0.63%	5.51%	4.10%	0.55%
FHLHC	4.60%	5.32	0.26%	0.21%	5.90%	4.43%	0.54%
FNMA	4.82%	5.45	0.25%	0.33%	5.88%	4.19%	0.46%
Palmer CLO AAA	4.58%	0.06		1.22%	5.45%	7.05%	

	3M Return	12M Return	3Y Return	5Y Return
SP 500	**-4.33%**	**17.80%**	**18.32%**	**12.06%**
Energy	38.25%	36.32%	18.03%	25.15%
Materials	9.73%	17.97%	9.38%	6.91%
Industrials	4.61%	25.17%	18.77%	12.24%
Consumer Discretionary	-9.19%	11.72%	15.40%	6.28%
Consumer Staples	7.68%	6.31%	8.61%	8.53%
Health Care	-4.88%	2.31%	6.04%	6.46%
Financials	-9.35%	0.72%	17.37%	9.72%
IT	-9.13%	29.05%	25.89%	18.15%
Telecom	-6.94%	32.51%	31.10%	12.92%
Utilities	8.26%	19.71%	14.19%	10.87%

1 & 3-Year Benchmark Risk/Return Plots

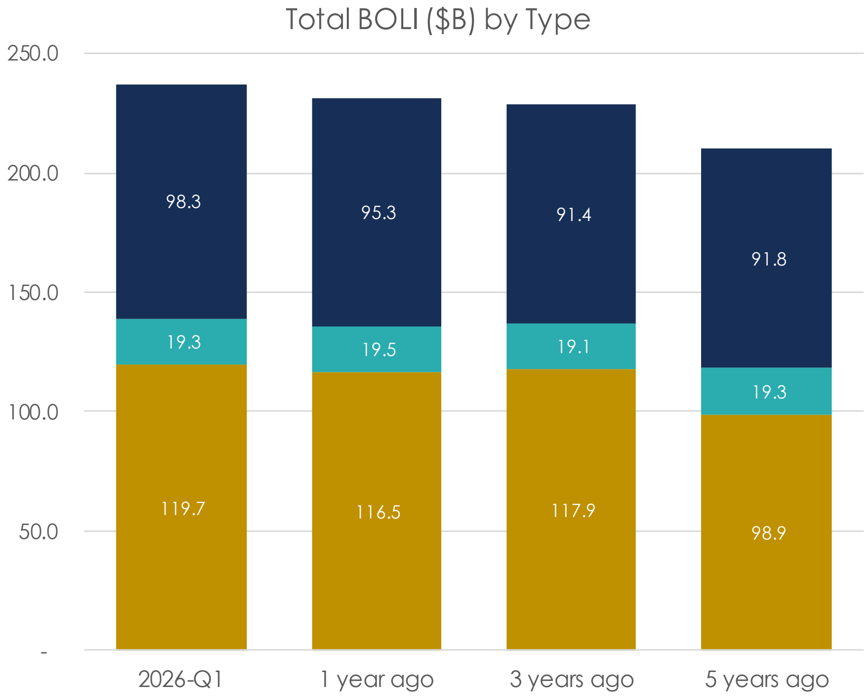


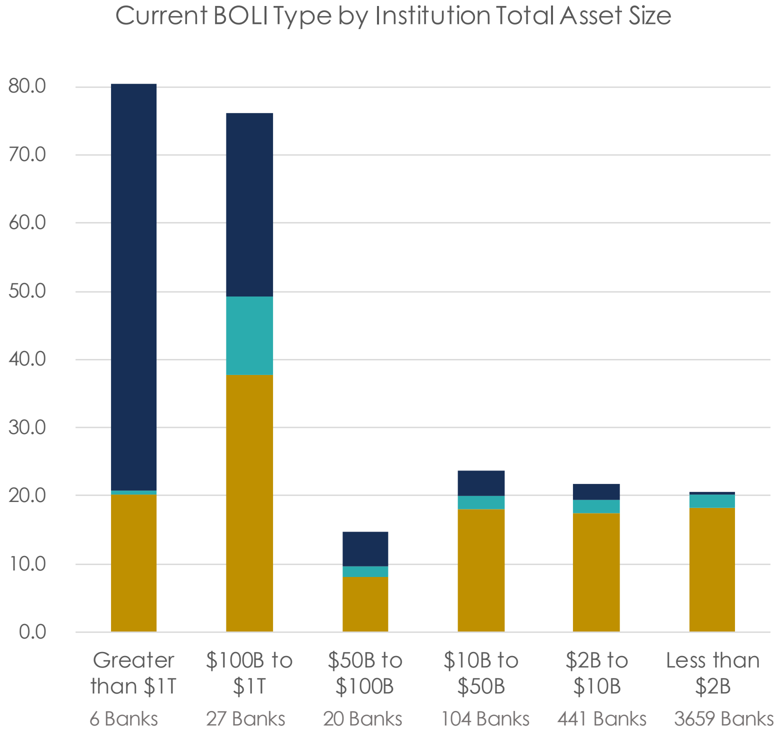


Data as of 2026-Q1

Recent Trends in BOLI

BOLI Market Overview as of 2026-Q1





Institutions represent Bank Holding Companies and Stand-Alone Savings & Loans and Banks

SA | GA | Hybrid

BOLI Market Overview as of 2026-Q1

Bank Size	Number of Banks[1]	% Owning BOLI	Total Assets (Billions)	GA BOLI (Billions)	Hybrid BOLI (Billions)	SA BOLI (Billions)	Total BOLI (Billions)	BOLI / Capital	BOLI / Assets
Greater than $1 Trillion	6	100%	17,022	20.1	0.7	59.8	80.6	7.02%	0.47%
$100 Billion to $1 Trillion	27	85%	8,330	37.8	11.4	27.0	76.2	9.58%	0.91%
$50 Billion to $100 Billion	20	95%	1,487	8.1	1.5	5.0	14.6	9.36%	0.98%
$10 Billion to $50 Billion	104	79%	2,320	18.0	2.0	3.7	23.7	8.93%	1.02%
$2 Billion to $10 Billion	441	82%	1,892	17.4	1.9	2.4	21.7	9.64%	1.15%
Less than $2 Billion	3,659	66%	1,673	18.3	1.8	0.5	20.5	9.85%	1.23%
TOTALS	**4,257**	**68%**	**32,725**	**119.7**	**19.3**	**98.3**	**237.3**	**8.48%**	**0.73%**

[1] The number of banks represents the number of Top Bank Holding Companies and Stand-Alone Savings & Loan and Banking Institutions.
A Bank Holding Company may have several subsidiary banks, but they are not counted individually in this figure.

Data Sourced from FFIEC Call Report Data

BOLI Risk-Weighted Assets Analysis

Bank Size	Number of Banks[1]	% Owning BOLI	SA Exposure ($B)	SA RWA ($B)	SA RWA / SA Exposure	Average Bank RW%
Greater than $1 Trillion	6	100%	60.5	18.3	30.3%	30.4%
$100 Billion to $1 Trillion	27	85%	33.0	14.4	43.6%	55.4%
$50 Billion to $100 Billion	20	95%	6.2	4.8	77.7%	67.1%
$10 Billion to $50 Billion	104	79%	5.3	3.4	65.0%	84.0%
$2 Billion to $10 Billion	441	82%	2.8	2.0	72.9%	88.7%
Less than $2 Billion	3,659	66%	0.3	0.3	98.5%	100.2%
Total	**4,257**	**68%**	**108.1**	**43.3**	**40.1%**	**86.9%**

Observations

- While many banks default to 100%, most large banks ($25B+) achieve SA RW% between 20%-45%, and account for over half the total SA exposure
- Banks include Hybrid BOLI when reporting SA Exposure and SA RWA in the call report values above. MB Schoen does have a method for estimating the RW% of SA BOLI only (excluding Hybrid). If interested, please reach out.

Recent BOLI Transaction Counts & Totals

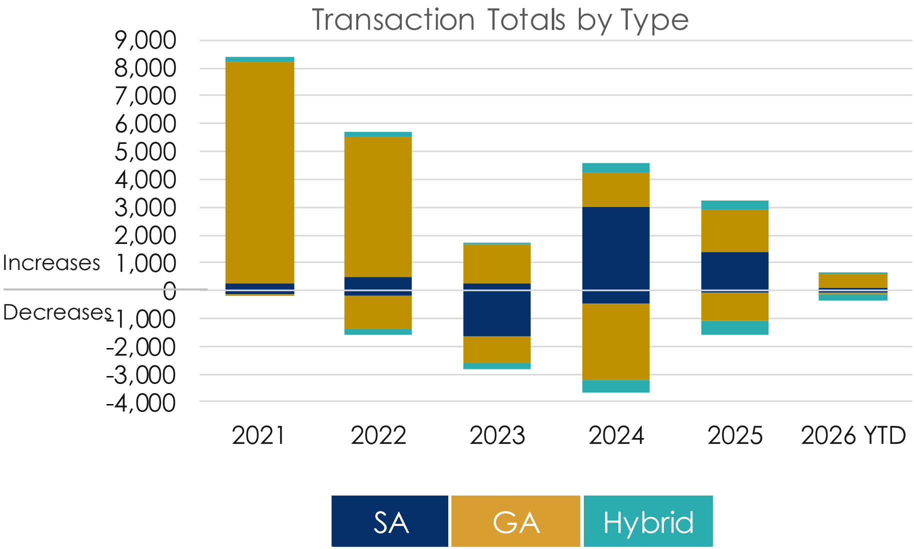
Movement or Transactions of $10M or More

Time Period	Confirmed Purchases	Amount (Millions)	Likely Purchases	Amount (Millions)	Total Purchases	Amount (Millions)	Confirmed Surrenders	Amount (Millions)	Other Large Decreases	Amount (Millions)	Total Decreases	Amount (Millions)
TOTAL												
2026-Q1	8	91	70	554	**78**	**645**	0	0	26	-369	**26**	**-369**
1-Year	28	493	165	2,462	**193**	**2,955**	6	-195	65	-1,468	**71**	**-1,664**
3-Year	61	2,843	280	6,565	**341**	**9,409**	37	-1,512	147	-6,784	**184**	**-8,296**
5-Year	158	9,788	476	12,952	**634**	**22,740**	42	-2,363	179	-7,714	**221**	**-10,076**
SA												
2026-Q1	0	0	5	72	**5**	**72**	0	0	3	-58	**3**	**-58**
1-Year	2	41	21	1,060	**23**	**1,101**	0	0	5	-68	**5**	**-68**
3-Year	11	1,446	53	3,263	**64**	**4,709**	5	-296	18	-1,940	**23**	**-2,236**
5-Year	15	1,533	70	3,947	**85**	**5,480**	6	-307	29	-2,213	**35**	**-2,520**
GA												
2026-Q1	8	91	51	441	**59**	**532**	0	0	15	-81	**15**	**-81**
1-Year	24	424	122	1,247	**146**	**1,672**	3	-161	38	-753	**41**	**-914**
3-Year	44	1,218	191	2,762	**235**	**3,979**	22	-1,040	84	-3,682	**106**	**-4,722**
5-Year	135	7,961	360	8,254	**495**	**16,215**	25	-1,870	93	-4,126	**118**	**-5,995**
HYBRID												
2026-Q1	0	0	14	41	**14**	**41**	0	0	8	-230	**8**	**-230**
1-Year	2	28	22	155	**24**	**183**	3	-35	22	-647	**25**	**-682**
3-Year	6	179	36	541	**42**	**720**	10	-176	45	-1,162	**55**	**-1,338**
5-Year	8	294	46	751	**54**	**1,045**	11	-186	57	-1,375	**68**	**-1,561**

Listings of activity by institution are available upon request
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Recent BOLI Transactions

Movement or Transactions of $10M or More



Activity in Millions | **Bolded** values are confirmed/noted in filings

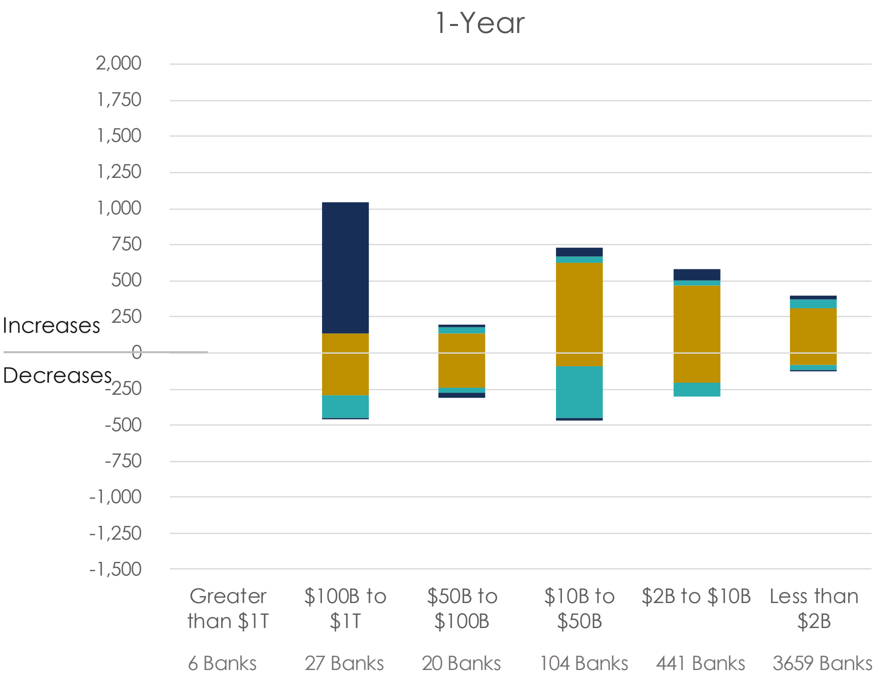
Current Quarter Notable		SA	GA	HY
2026-Q1	WesBanco	($22)	$128	($103)
2026-Q1	M&T Bank Corp		$81	($86)
2026-Q1	First Citizens	$56	($34)	($25)
2026-Q1	Capitol Federal Financial		**$45**	
2026-Q1	UMB Financial	($35)	$35	

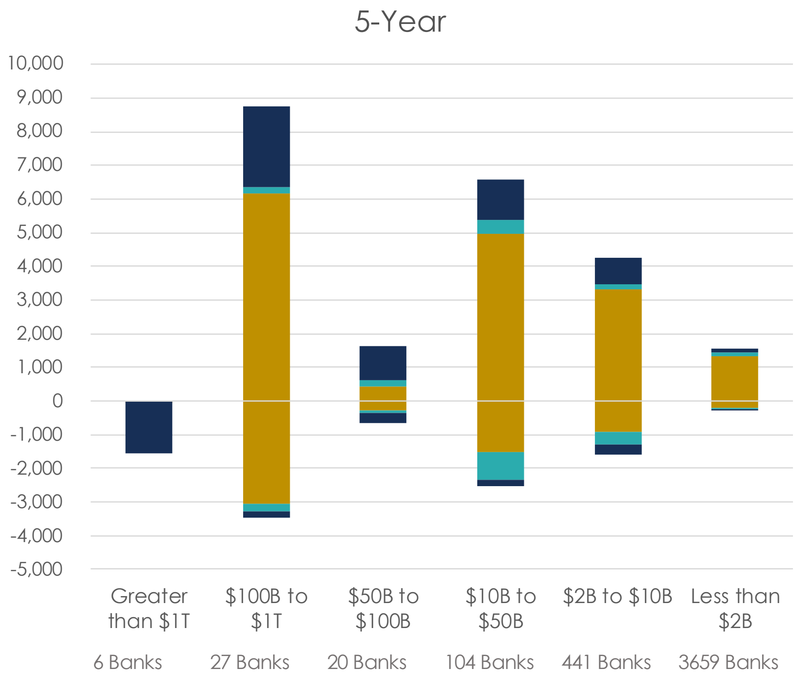
Recently Notable		SA	GA	HY
2025-Q4	Truist	$600		
2025-Q4	Synovus		($195)	($20)
2025-Q3	Servisfirst Bancshares		**$125**	
2025-Q2	Truist	$260	($260)	
2025-Q2	City National Bank of Florida		$215	($215)
2025-Q1	Eagle Bcorp	**$200**		
2024-Q4	Truist	$1,139	($1,120)	
2024-Q4	Banc of California	$218	($200)	($20)

Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

BOLI Transactions by Type and Bank Size

Movement or Transactions of $10M or More





SA | GA | Hybrid

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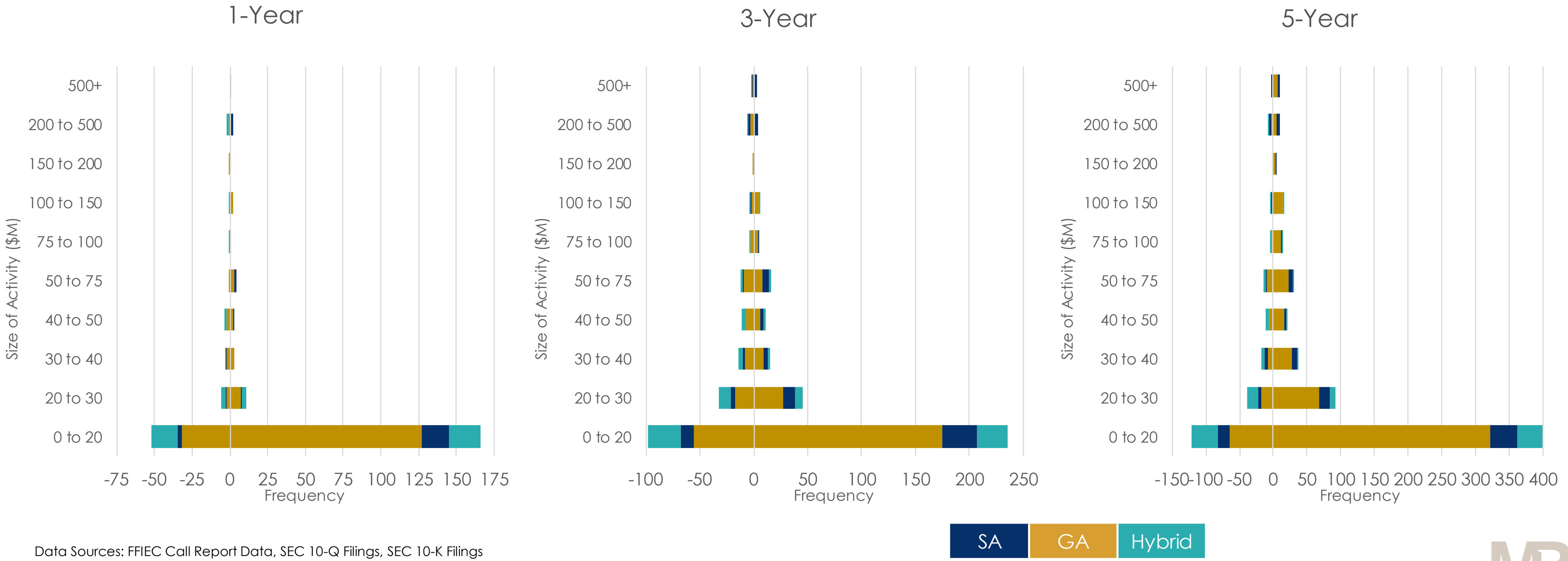
Frequency of BOLI Transaction Sizes

Movement or Transactions of $1M or More

- Over the past 5 years, 76% of transactions have been below $30 Million, while 6% are over $100 million



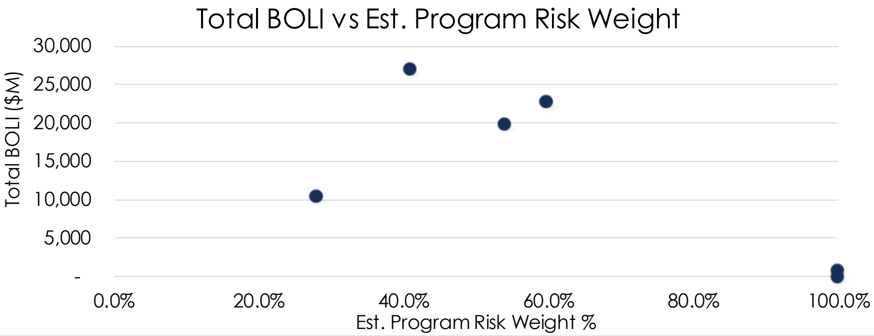
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Market Analytics By Bank Size

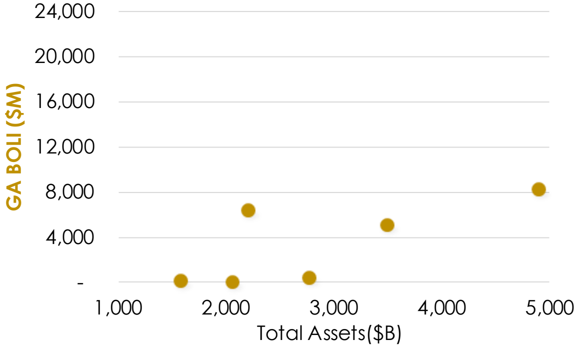
Banks with over $1T in Total Assets

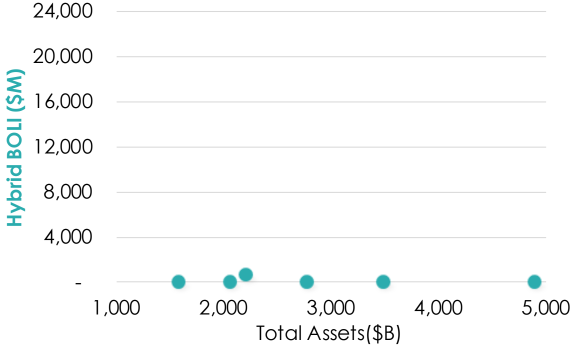
6 of 6 banks own BOLI

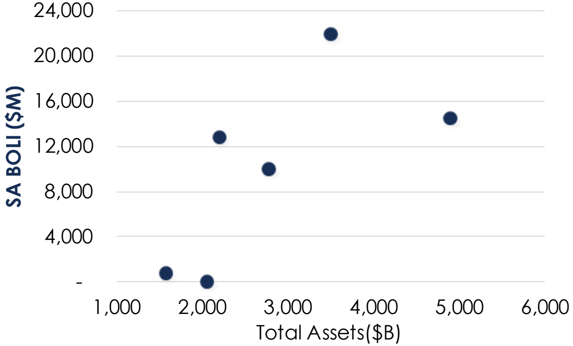
	GA ($M)	Hybrid ($M)	SA ($M)	Total BOLI ($M)	BOLI / Capital
Total	**20,093**	**674**	**59,795**	**80,562**	**7%**
Average	3,349	112	9,966	13,427	6%
Last Q # of Increases	-	-	-	-	
Increase Total ($M)	-	-	-	-	
Last Q # of Decreases	-	-	-	-	
Decrease Total ($M)	-	-	-	-	



Types of BOLI by Bank Asset Size







Recent BOLI Transaction Counts & Totals

Banks with over $1T in Total Assets

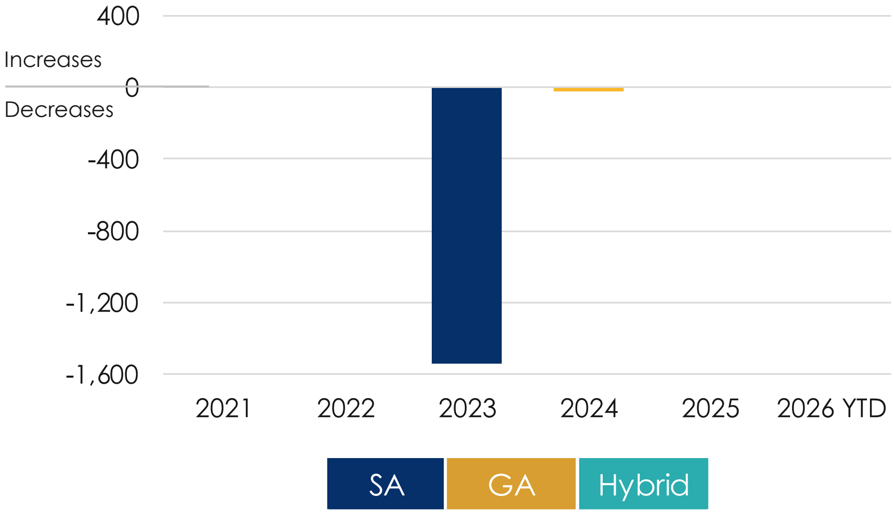
Time Period	Confirmed Purchases	Amount (Millions)	Likely Purchases	Amount (Millions)	Total Purchases	Amount (Millions)	Confirmed Surrenders	Amount (Millions)	Other Large Decreases	Amount (Millions)	Total Decreases	Amount (Millions)
TOTAL												
2026-Q1	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
1-Year	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
3-Year	0	0	0	0	**0**	**0**	0	0	3	-1,558	**3**	**-1,558**
5-Year	0	0	0	0	**0**	**0**	0	0	3	-1,558	**3**	**-1,558**
SA												
2026-Q1	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
1-Year	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
3-Year	0	0	0	0	**0**	**0**	0	0	2	-1,540	**2**	**-1,540**
5-Year	0	0	0	0	**0**	**0**	0	0	2	-1,540	**2**	**-1,540**
GA												
2026-Q1	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
1-Year	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
3-Year	0	0	0	0	**0**	**0**	0	0	1	-18	**1**	**-18**
5-Year	0	0	0	0	**0**	**0**	0	0	1	-18	**1**	**-18**
HYBRID												
2026-Q1	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
1-Year	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
3-Year	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
5-Year	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**

Listings of activity by institution are available upon request
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Recent BOLI Transactions

Banks with over $1T in Total Assets

Transaction Totals by Type



Activity in Millions | **Bolded** values are confirmed/noted in filings

Current Quarter		SA	GA	HY

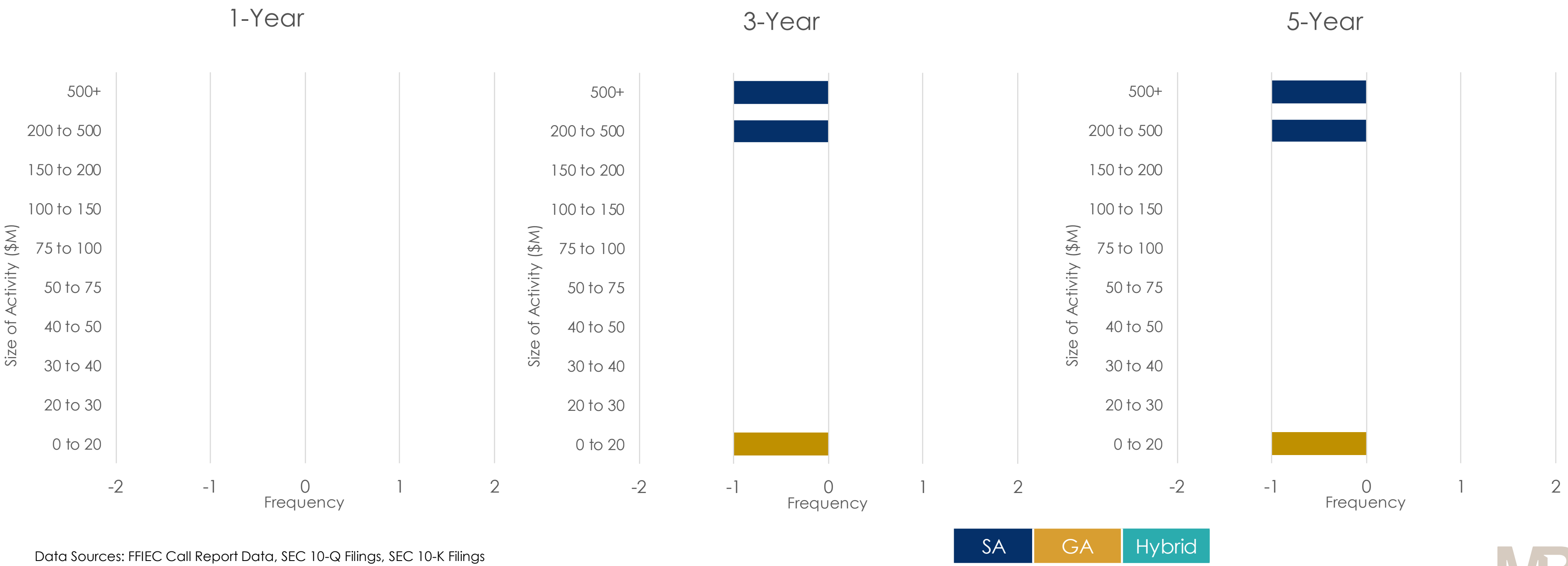
Recently Notable		SA	GA	HY
2024-Q2	Morgan Stanley		($18)	
2023-Q4	Morgan Stanley	($311)		
2023-Q3	Wells Fargo	($1,230)		

Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Frequency of BOLI Transaction Sizes

Banks with over $1T in Total Assets

- While they own over a third of all BOLI, MB Schoen has only tracked 3 transactions (not related to M&A) over the last 5 years



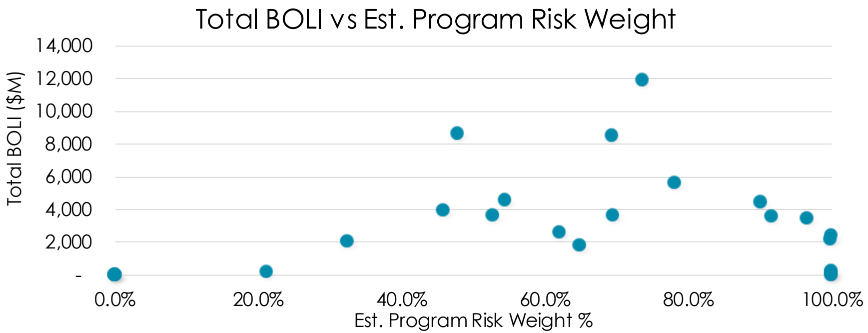
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Market Analytics By Bank Size

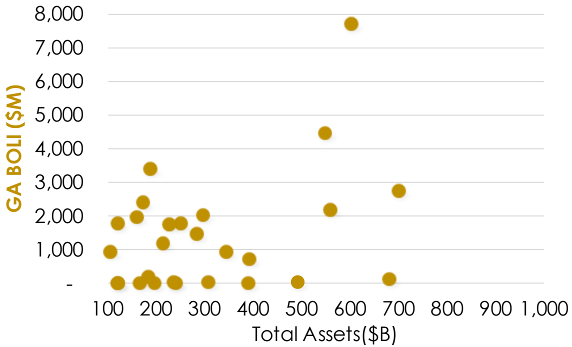
Banks with $100B to $1T in Total Assets

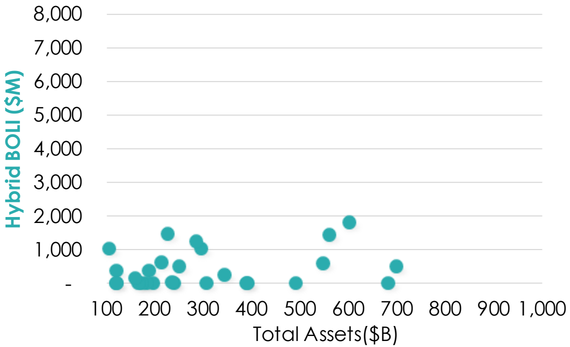
23 of 27 banks own BOLI

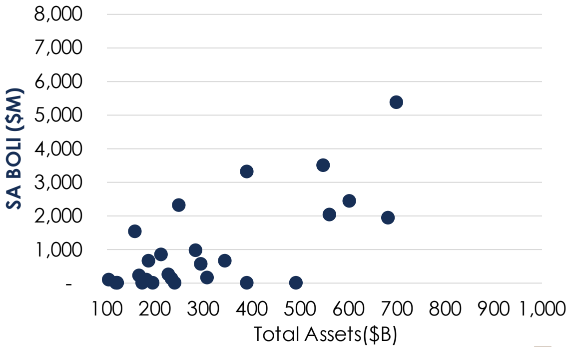
	GA ($M)	Hybrid ($M)	SA ($M)	Total BOLI ($M)	BOLI / Capital
Total	**37,793**	**11,397**	**26,965**	**76,155**	**10%**
Average	1,400	422	999	2,821	27%
Last Q # of Increases	1	-	1	2	
Increase Total ($M)	81	-	56	137	
Last Q # of Decreases	1	2	-	3	
Decrease Total ($M)	(34)	(111)	-	(145)	



Types of BOLI by Bank Asset Size







Recent BOLI Transaction Counts & Totals

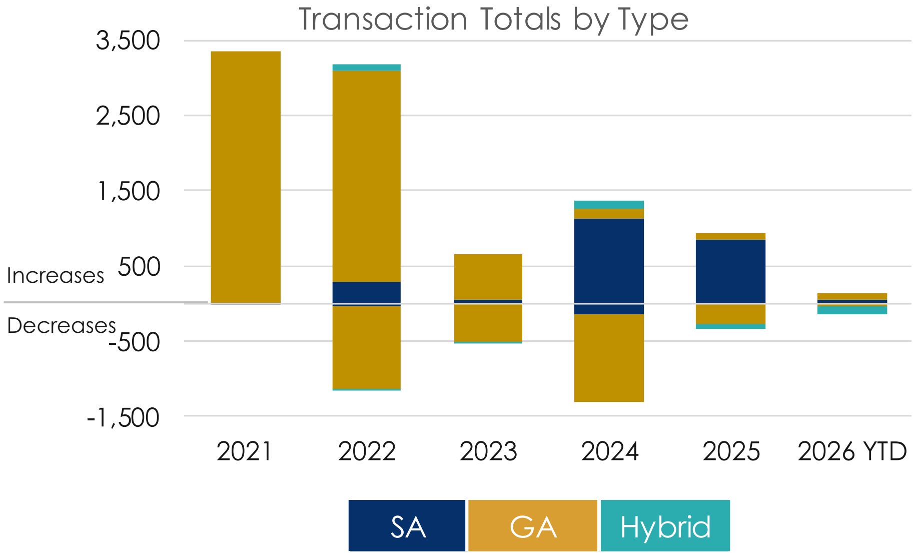
Banks with $100B to $1T in Total Assets

Time Period	Confirmed Purchases	Amount (Millions)	Likely Purchases	Amount (Millions)	Total Purchases	Amount (Millions)	Confirmed Surrenders	Amount (Millions)	Other Large Decreases	Amount (Millions)	Total Decreases	Amount (Millions)
TOTAL												
2026-Q1	0	0	2	137	**2**	**137**	0	0	3	-145	**3**	**-145**
1-Year	0	0	5	1,047	**5**	**1,047**	0	0	6	-455	**6**	**-455**
3-Year	1	10	13	2,478	**14**	**2,488**	0	0	15	-2,254	**15**	**-2,254**
5-Year	13	3,809	20	4,942	**33**	**8,751**	2	-815	18	-2,641	**20**	**-3,456**
SA												
2026-Q1	0	0	1	56	**1**	**56**	0	0	0	0	**0**	**0**
1-Year	0	0	3	916	**3**	**916**	0	0	1	-4	**1**	**-4**
3-Year	0	0	5	2,078	**5**	**2,078**	0	0	2	-137	**2**	**-137**
5-Year	2	52	7	2,350	**9**	**2,402**	0	0	3	-174	**3**	**-174**
GA												
2026-Q1	0	0	1	81	**1**	**81**	0	0	1	-34	**1**	**-34**
1-Year	0	0	2	131	**2**	**131**	0	0	2	-294	**2**	**-294**
3-Year	1	10	5	311	**6**	**321**	0	0	8	-1,918	**8**	**-1,918**
5-Year	11	3,757	9	2,421	**20**	**6,178**	2	-815	9	-2,244	**11**	**-3,059**
HYBRID												
2026-Q1	0	0	0	0	**0**	**0**	0	0	2	-111	**2**	**-111**
1-Year	0	0	0	0	**0**	**0**	0	0	3	-157	**3**	**-157**
3-Year	0	0	3	90	**3**	**90**	0	0	5	-199	**5**	**-199**
5-Year	0	0	4	171	**4**	**171**	0	0	6	-223	**6**	**-223**

Listings of activity by institution are available upon request
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Recent BOLI Transactions

Banks with $100B to $1T in Total Assets



Activity in Millions | **Bolded** values are confirmed/noted in filings

Current Quarter		SA	GA	HY
2026-Q1	First Citizens	$56	($34)	($25)
2026-Q1	M&T Bank Corp		$81	($86)

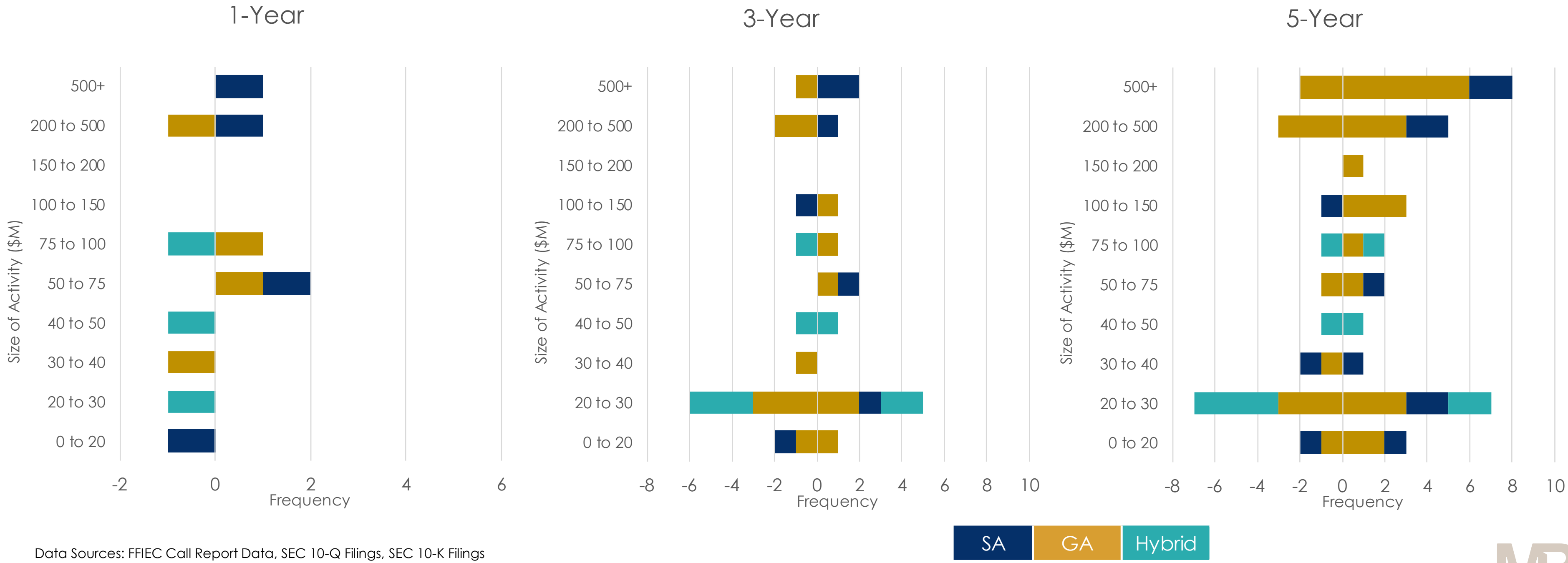
Recently Notable		SA	GA	HY
2025-Q4	Truist	$600		
2025-Q2	Truist	$260	($260)	
2025-Q2	Regions	($4)	$50	($46)
2025-Q1	Citizens Financial		$20	($20)
2024-Q4	Truist	$1,139	($1,120)	
2024-Q1	Truist	($133)	$133	
2024-Q1	Citizens Financial		($23)	$43
2024-Q4	New York Community Bcorp		($10)	$20
2023-Q4	New York Community Bcorp		$27	($22)
2023-Q3	BMO	$23	($23)	
2023-Q2	First Citizens		($427)	
2023-Q1	First Citizens		**($55)**	
2023-Q1	First Republic	$25	$575	

Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Frequency of BOLI Transaction Sizes

Banks with $100B to $1T in Total Assets

- Many recent deals have been over $200 million, and are trending from General to Separate Account



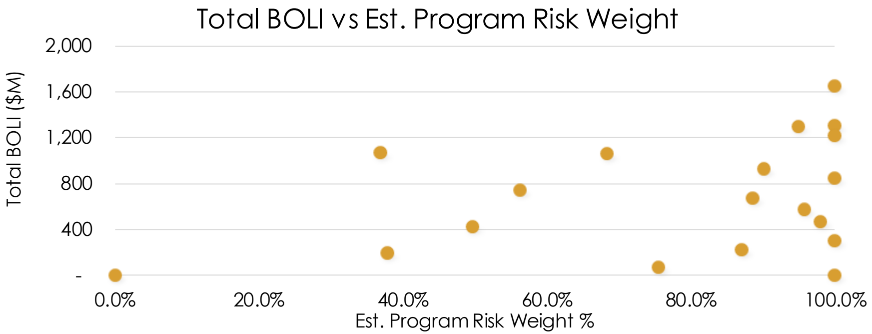
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Market Analytics By Bank Size

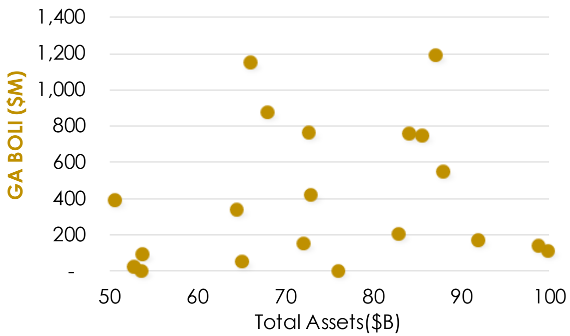
Banks with $50B to $100B in Total Assets

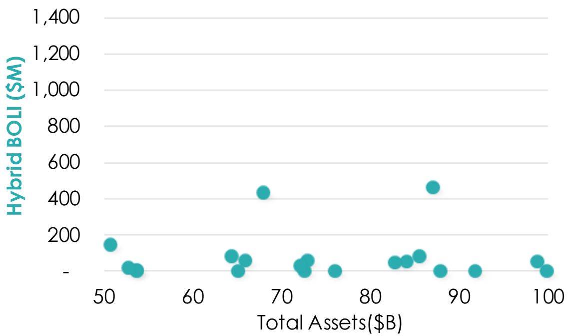
19 of 20 banks own BOLI

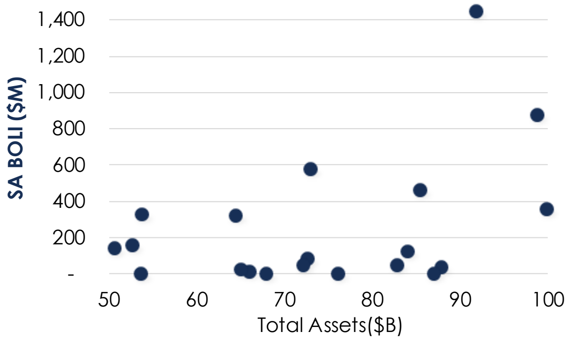
	GA ($M)	Hybrid ($M)	SA ($M)	Total BOLI ($M)	BOLI / Capital
Total	**8,102**	**1,522**	**5,016**	**14,641**	**9%**
Average	405	76	251	732	10%
Last Q # of Increases	1	-	-	1	
Increase Total ($M)	35	-	-	35	
Last Q # of Decreases	-	-	1	1	
Decrease Total ($M)	-	-	(35)	(35)	



Types of BOLI by Bank Asset Size







Recent BOLI Transaction Counts & Totals

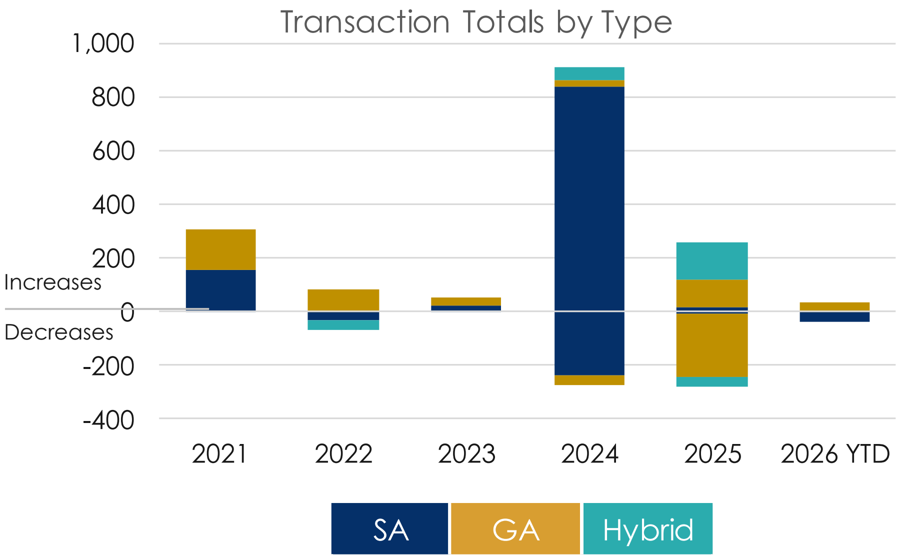
Banks with $50B to $100B in Total Assets

Time Period	Confirmed Purchases	Amount (Millions)	Likely Purchases	Amount (Millions)	Total Purchases	Amount (Millions)	Confirmed Surrenders	Amount (Millions)	Other Large Decreases	Amount (Millions)	Total Decreases	Amount (Millions)
TOTAL												
2026-Q1	0	0	1	35	**1**	**35**	0	0	1	-35	**1**	**-35**
1-Year	4	102	4	94	**8**	**196**	0	0	7	-315	**7**	**-315**
3-Year	8	1,068	8	190	**16**	**1,258**	2	-253	8	-338	**10**	**-591**
5-Year	9	1,218	16	414	**25**	**1,632**	2	-253	11	-408	**13**	**-661**
SA												
2026-Q1	0	0	0	0	**0**	**0**	0	0	1	-35	**1**	**-35**
1-Year	0	0	1	16	**1**	**16**	0	0	2	-41	**2**	**-41**
3-Year	1	800	3	74	**4**	**874**	1	-215	3	-64	**4**	**-279**
5-Year	1	800	7	214	**8**	**1,014**	1	-215	4	-93	**5**	**-307**
GA												
2026-Q1	0	0	1	35	**1**	**35**	0	0	0	0	**0**	**0**
1-Year	4	102	1	35	**5**	**137**	0	0	3	-238	**3**	**-238**
3-Year	5	130	2	61	**7**	**191**	1	-38	3	-238	**4**	**-276**
5-Year	6	280	6	145	**12**	**425**	1	-38	3	-238	**4**	**-276**
HYBRID												
2026-Q1	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
1-Year	0	0	2	43	**2**	**43**	0	0	2	-36	**2**	**-36**
3-Year	2	138	3	55	**5**	**193**	0	0	2	-36	**2**	**-36**
5-Year	2	138	3	55	**5**	**193**	0	0	4	-77	**4**	**-77**

Listings of activity by institution are available upon request
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Recent BOLI Transactions

Banks with $50B to $100B in Total Assets



Activity in Millions | **Bolded** values are confirmed/noted in filings

Current Quarter		SA	GA	HY
2026-Q1	UMB Financial	($35)	$35	

Recently Notable		SA	GA	HY
2025-Q4	UMB Financial		**$36**	
2025-Q4	Columbia Banking	($6)	**$13**	
2025-Q4	Synovus		($195)	($20)
2025-Q4	Cadence		($25)	$25
2025-Q2	Pinnacle Finl Partners		**$50**	
2025-Q2	Synovus		($18)	$18
2025-Q2	Wintrust Financial Corp	$16		($16)
2025-Q1	Pinnacle Finl Partners			**$100**
2024-Q4	Synovus		**($38)**	**$38**
2024-Q3	Western Alliance Bcorp	**$800**		
2024-Q2	Valley National	($23)	$26	
2024-Q1	First Horizon	**($215)**		

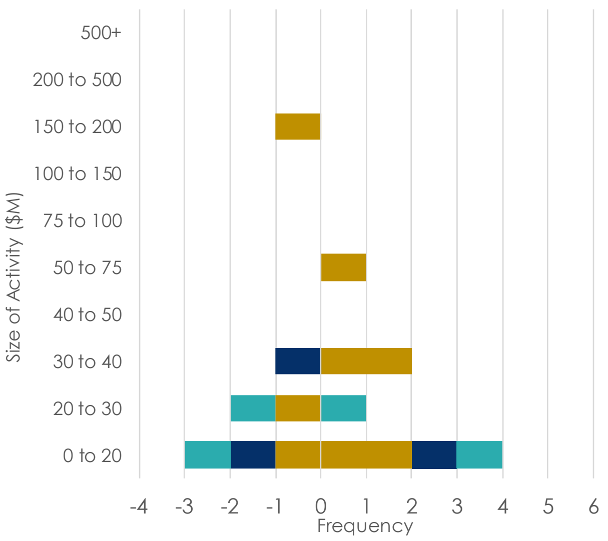
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Frequency of BOLI Transaction Sizes

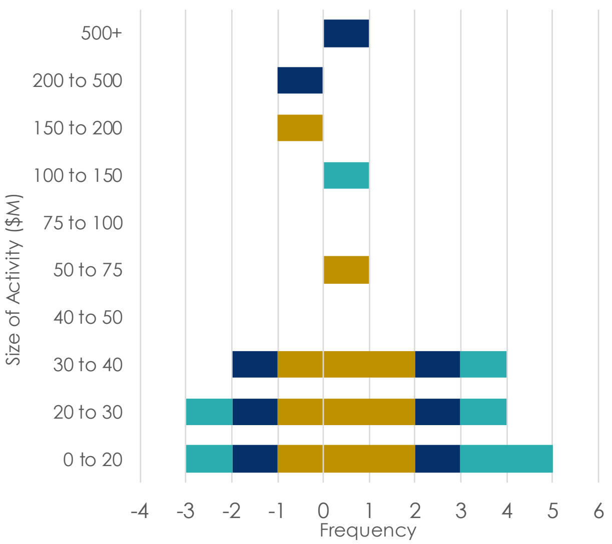
Banks with $50B to $100B in Total Assets

- Recent purchases have been mostly under 50 million with a few outliers

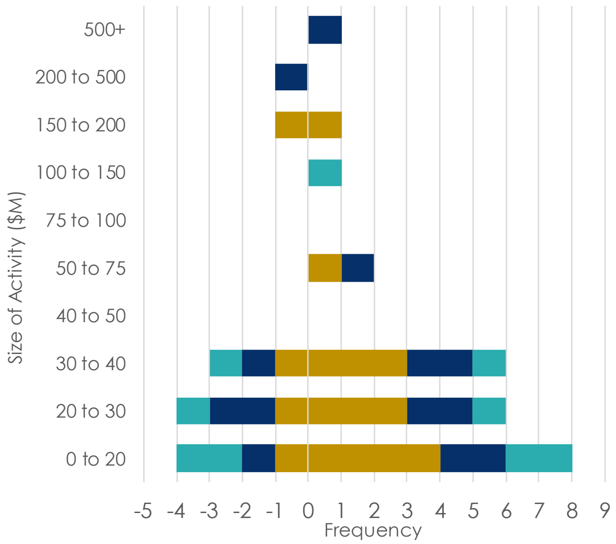
1-Year



3-Year



5-Year



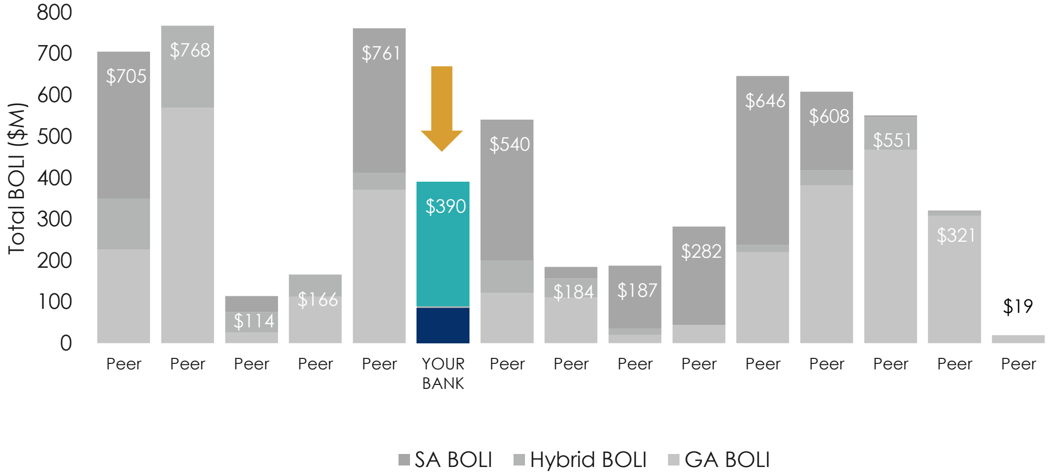
SA | GA | Hybrid

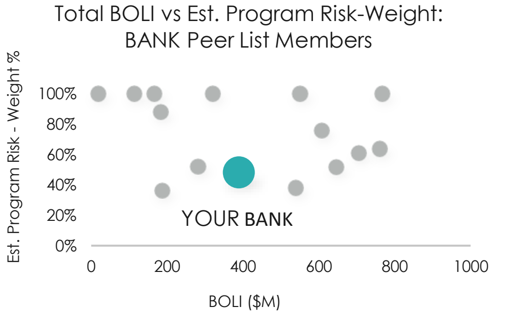
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

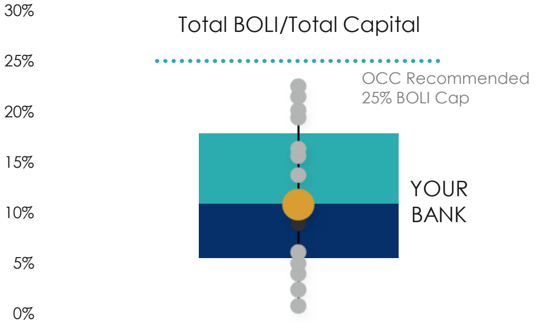
SUBSCRIPTION SERVICES

CUSTOM PEER BANK REPORTS

- ✓ Customizable— Create your peer group & choose which banks to include
- ✓ Risk Management— Extensive peer BOLI monitoring
- ✓ Comprehensive Updates— Quarterly review of BOLI market activity







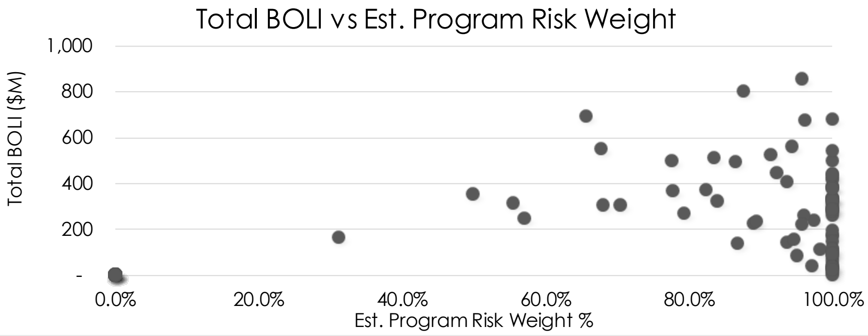
To request a subscription or more information; contact tharemy.hopkins@mbschoen.com or call 701-205-3571

Market Analytics By Bank Size

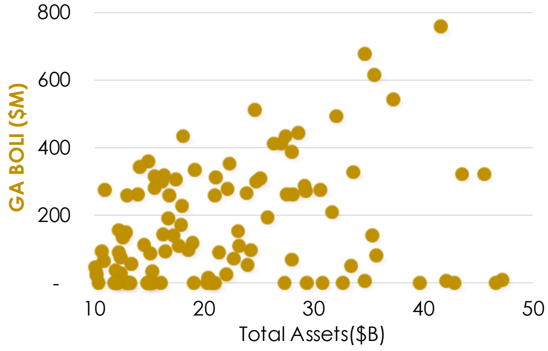
Banks with $10B to $50B in Total Assets

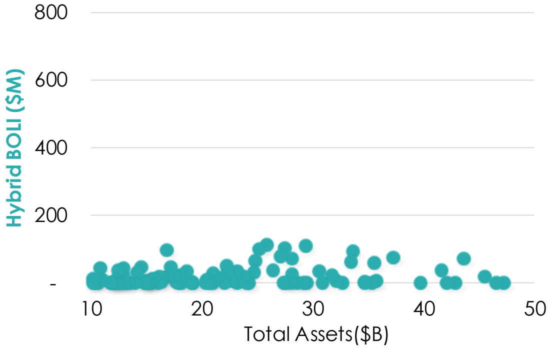
82 of 104 banks own BOLI

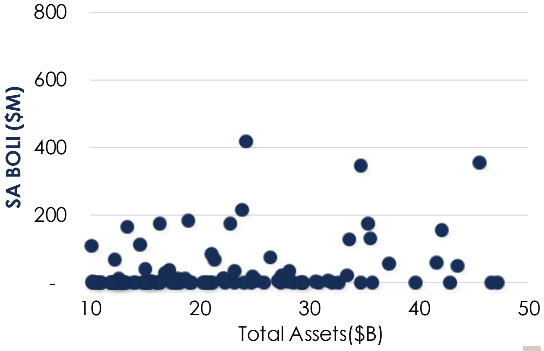
	GA ($M)	Hybrid ($M)	SA ($M)	Total BOLI ($M)	BOLI / Capital
Total	**18,017**	**2,017**	**3,676**	**23,709**	**9%**
Average	173	19	35	228	89%
Last Q # of Increases	2	1	-	3	
Increase Total ($M)	136	15	-	151	
Last Q # of Decreases	-	1	1	2	
Decrease Total ($M)	-	(103)	(22)	(125)	



Types of BOLI by Bank Asset Size







Recent BOLI Transaction Counts & Totals

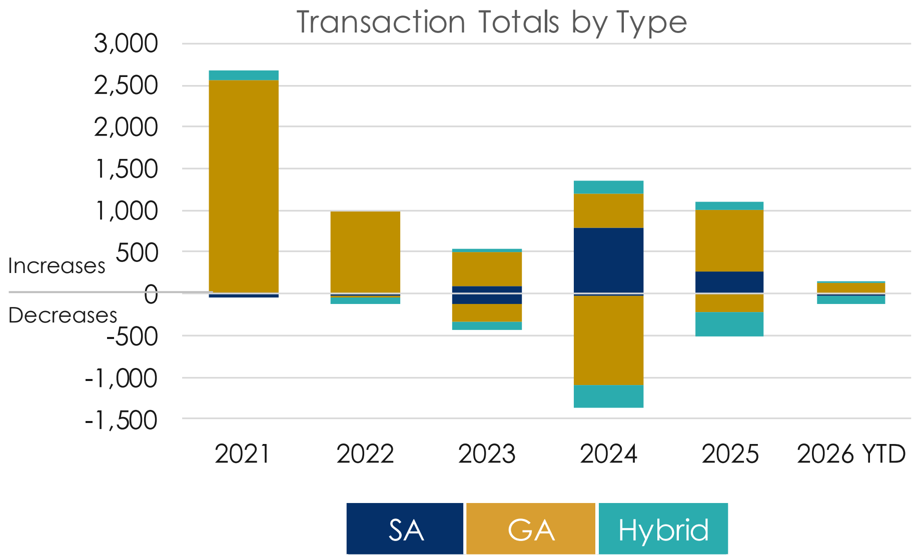
Banks with $10B to $50B in Total Assets

Time Period	Confirmed Purchases	Amount (Millions)	Likely Purchases	Amount (Millions)	Total Purchases	Amount (Millions)	Confirmed Surrenders	Amount (Millions)	Other Large Decreases	Amount (Millions)	Total Decreases	Amount (Millions)
TOTAL												
2026-Q1	0	0	3	151	**3**	**151**	0	0	2	-125	**2**	**-125**
1-Year	2	165	14	566	**16**	**731**	2	-54	8	-416	**10**	**-470**
3-Year	14	1,071	53	1,984	**67**	**3,056**	18	-678	43	-1,706	**61**	**-2,384**
5-Year	49	3,170	88	3,398	**137**	**6,568**	18	-678	53	-1,865	**71**	**-2,543**
SA												
2026-Q1	0	0	0	0	**0**	**0**	0	0	1	-22	**1**	**-22**
1-Year	1	40	2	23	**3**	**63**	0	0	1	-22	**1**	**-22**
3-Year	4	433	14	693	**18**	**1,125**	2	-37	4	-102	**6**	**-139**
5-Year	4	433	17	738	**21**	**1,171**	2	-37	6	-148	**8**	**-185**
GA												
2026-Q1	0	0	2	136	**2**	**136**	0	0	0	0	**0**	**0**
1-Year	1	125	10	499	**11**	**624**	1	-40	3	-49	**4**	**-89**
3-Year	8	625	30	1,022	**38**	**1,647**	10	-545	23	-959	**33**	**-1,504**
5-Year	42	2,624	60	2,351	**102**	**4,974**	10	-545	25	-988	**35**	**-1,533**
HYBRID												
2026-Q1	0	0	1	15	**1**	**15**	0	0	1	-103	**1**	**-103**
1-Year	0	0	2	45	**2**	**45**	1	-14	4	-345	**5**	**-358**
3-Year	2	13	9	270	**11**	**283**	6	-96	16	-646	**22**	**-742**
5-Year	3	113	11	309	**14**	**423**	6	-96	22	-730	**28**	**-826**

Listings of activity by institution are available upon request
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Recent BOLI Transactions

Banks with $10B to $50B in Total Assets



Activity in Millions | **Bolded** values are confirmed/noted in filings

Current Quarter		SA	GA	HY
2026-Q1	WesBanco	($22)	$128	($103)
2026-Q1	Hancock Whitney			$15
2026-Q1	Bankunitied		$8	

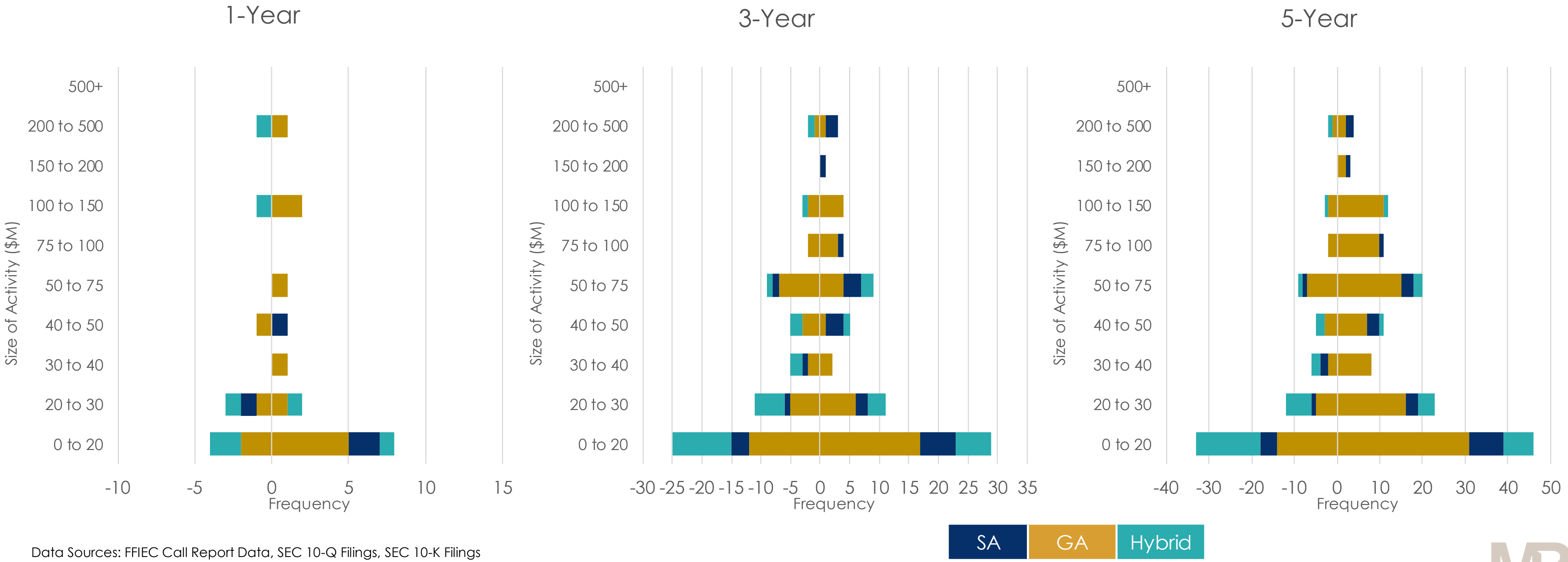
Recently Notable		SA	GA	HY
2025-Q4	City National Bank of Florida		$24	($24)
2025-Q4	Dollar Mutual Bcorp		($30)	$30
2025-Q3	Servisfirst Bancshares		**$125**	
2025-Q3	Dollar Mutual Bcorp		$30	
2025-Q2	City National Bank of Florida		$215	($215)
2025-Q2	Spend Life Wisely Co		$65	
2025-Q2	First Hawaiian	**$40**	**($40)**	
2025-Q1	Eagle Bcorp Inc	**$200**		
2025-Q1	DIME Community Bancshares		**$97**	**($6)**
2025-Q1	City National Bank of Florida		($65)	$65
2024-Q4	Banc of California	$218	($200)	($20)
2024-Q4	Axos Financial Inc		**$100**	
2024-Q3	City National Bank of Florida		($110)	($54)

Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Frequency of BOLI Transaction Sizes

Banks with $10B to $50B in Total Assets

- Most purchases for these sized banks have been under $75 million, and many a reverse action from a decrease of another type of BOLI (restructuring)



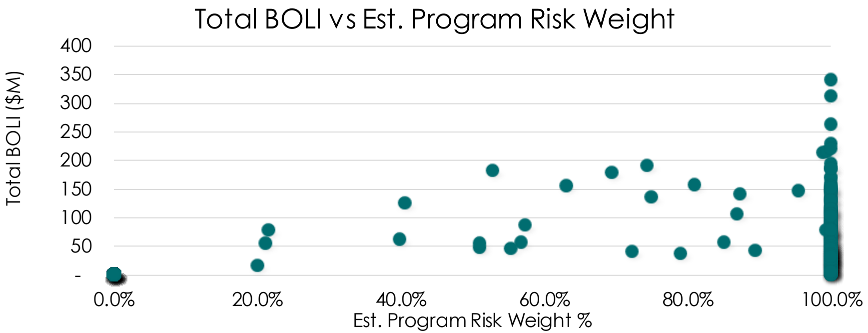
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Market Analytics By Bank Size

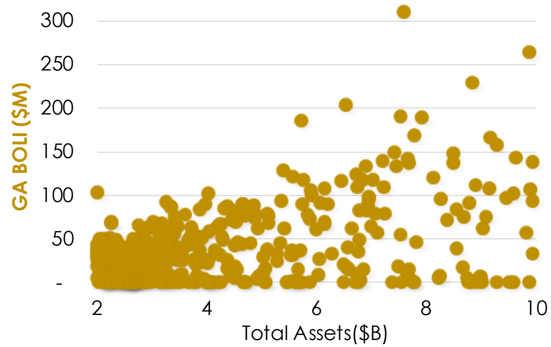
Banks with $2B to $10B in Total Assets

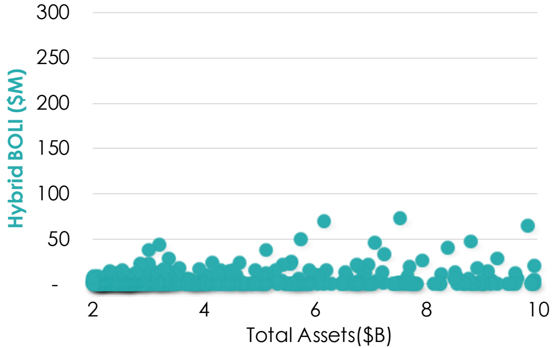
363 of 441 banks own BOLI

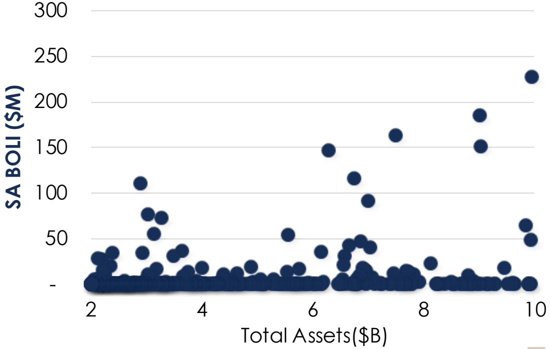
	GA ($M)	Hybrid ($M)	SA ($M)	Total BOLI ($M)	BOLI / Capital
Total	**15,236**	**1,733**	**2,244**	**19,213**	**10%**
Average	45	5	7	56	10%
Last Q # of Increases	17	1	-	18	
Increase Total ($M)	159	2	-	160	
Last Q # of Decreases	1	3	-	4	
Decrease Total ($M)	(2)	(11)	-	(13)	



Types of BOLI by Bank Asset Size







Recent BOLI Transaction Counts & Totals

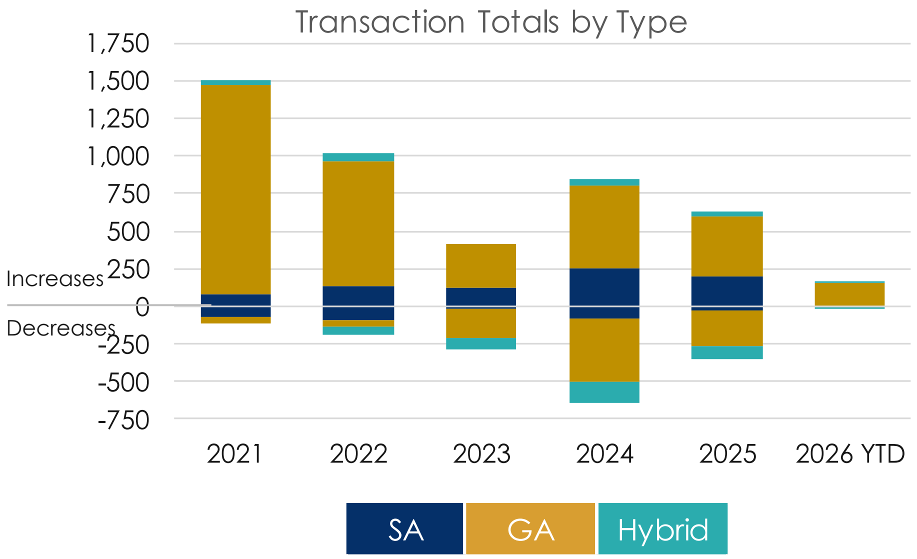
Banks with $2B to $10B in Total Assets

Time Period	Confirmed Purchases	Amount (Millions)	Likely Purchases	Amount (Millions)	Total Purchases	Amount (Millions)	Confirmed Surrenders	Amount (Millions)	Other Large Decreases	Amount (Millions)	Total Decreases	Amount (Millions)
TOTAL												
2026-Q1	7	86	11	74	**18**	**160**	0	0	4	-13	**4**	**-13**
1-Year	19	205	37	378	**56**	**582**	4	-142	16	-163	**20**	**-305**
3-Year	34	637	87	1,345	**121**	**1,983**	17	-581	44	-700	**61**	**-1,281**
5-Year	78	1,485	159	2,754	**237**	**4,239**	20	-617	56	-968	**76**	**-1,584**
SA												
2026-Q1	0	0	0	0	**0**	**0**	0	0	0	0	**0**	**0**
1-Year	1	1	8	76	**9**	**77**	0	0	0	0	**0**	**0**
3-Year	6	214	22	338	**28**	**551**	2	-44	5	-77	**7**	**-122**
5-Year	8	249	28	526	**36**	**774**	3	-55	11	-229	**14**	**-284**
GA												
2026-Q1	7	86	10	73	**17**	**159**	0	0	1	-2	**1**	**-2**
1-Year	17	191	25	280	**42**	**471**	2	-121	9	-86	**11**	**-207**
3-Year	27	411	59	945	**86**	**1,356**	11	-457	24	-395	**35**	**-852**
5-Year	68	1,209	120	2,096	**188**	**3,305**	12	-471	27	-448	**39**	**-919**
HYBRID												
2026-Q1	0	0	1	2	**1**	**2**	0	0	3	-11	**3**	**-11**
1-Year	1	13	4	22	**5**	**34**	2	-21	7	-77	**9**	**-98**
3-Year	1	13	6	63	**7**	**76**	4	-80	15	-227	**19**	**-307**
5-Year	2	28	11	132	**13**	**160**	5	-90	18	-291	**23**	**-381**

Listings of activity by institution are available upon request
Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Recent BOLI Transactions

Banks with $2B to $10B in Total Assets



Activity in Millions | **Bolded** values are confirmed/noted in filings

Current Quarter		SA	GA	HY
2026-Q1	Capitol Federal Financial		**$45**	
2026-Q1	First Citizens Community Bank		$22	
2026-Q1	ChoiceOne		**$11**	
2026-Q1	United National Corp		$15	
2026-Q1	Avidia Bank		**$10**	
2026-Q1	Big Poppy		$10	
2026-Q1	Primis Financial		**$8**	
2026-Q1	Pathward Financial			($8)
2026-Q1	Greene County		**$6**	

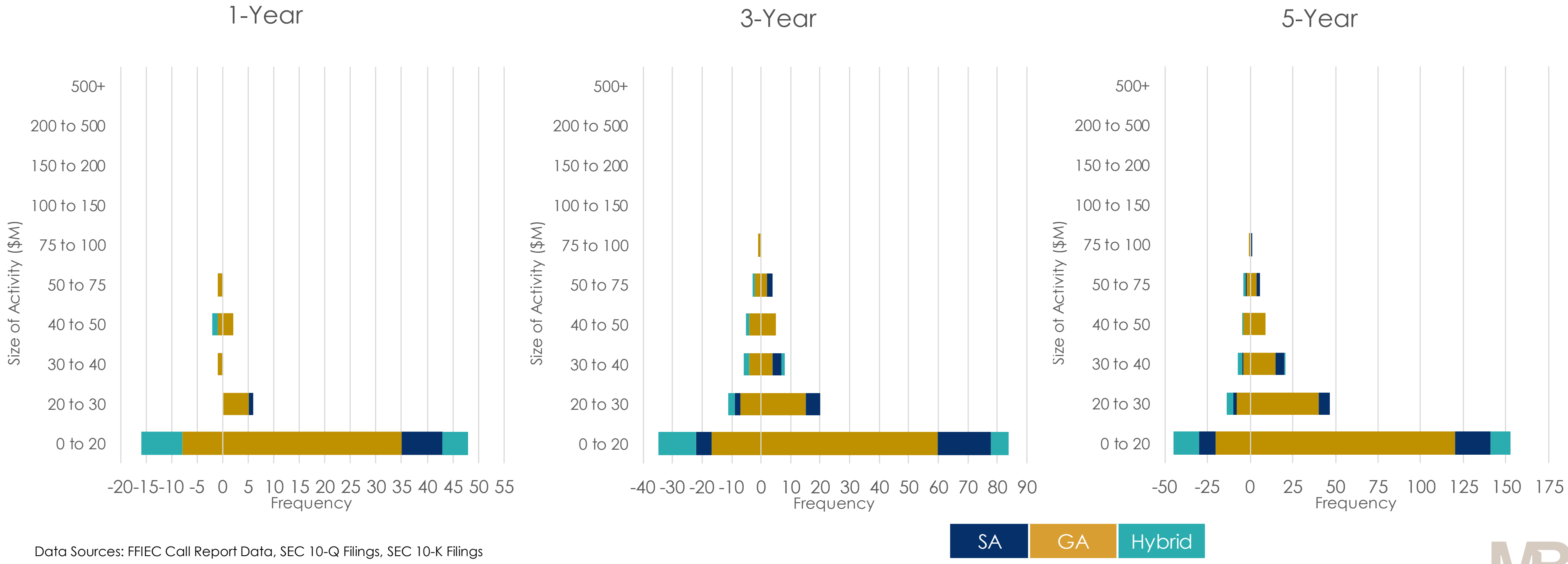
Recently Notable		SA	GA	HY
2025-Q4	Pathward Financial		($32)	($10)
2025-Q3	Midwest BankCentre	$21	($11)	($10)
2025-Q2	Financial Institutions Inc (NY)		**($73)**	
2025-Q2	NB Bcorp		**($48)**	
2025-Q2	Flushing Financial Corp		$43	($43)
2025-Q1	Financial Institutions Inc	**$73**		

Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

Frequency of BOLI Transaction Sizes

Banks with $2B to $10B in Total Assets

- This bank tier has only seen one recent purchase over $75 million, with the majority under $30 million
- Over the last two years, many transactions appear to be restructuring related



Data Sources: FFIEC Call Report Data, SEC 10-Q Filings, SEC 10-K Filings

BOLI Industry Allocations & Analytics

MBSA BOLI Industry Allocations Study

Our ongoing study attempts to track how SA BOLI is allocated over time

Gathered SA BOLI AUM data is categorized into portfolio types

- Multi-Sector / Capital Efficient / Target RW / "Dynamic"
- Core Fixed Income

(includes immaterial dedicated high yield and credit portfolios)

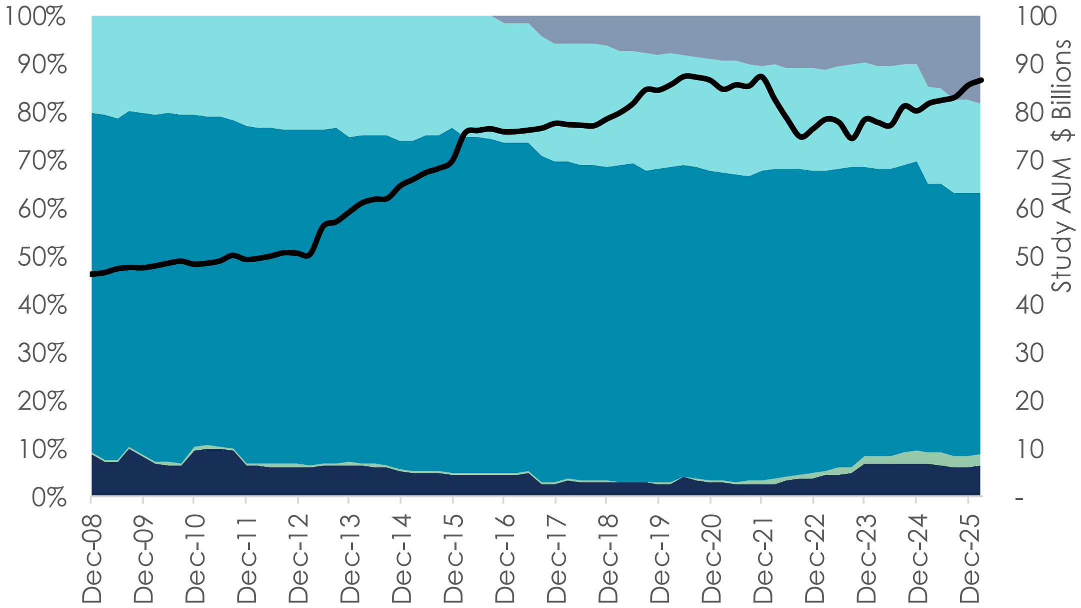
- MBS / Securitized (ABS / CMBS)
- CLO / Bank Loan
- Short Duration / Government

Portfolio types represent full portfolio MVs and do not look through to the holdings sector weights

The study currently aggregates $87 billion of SA – a massive share of the industry

SA BOLI Industry Allocations

SA BOLI Allocations Over Time



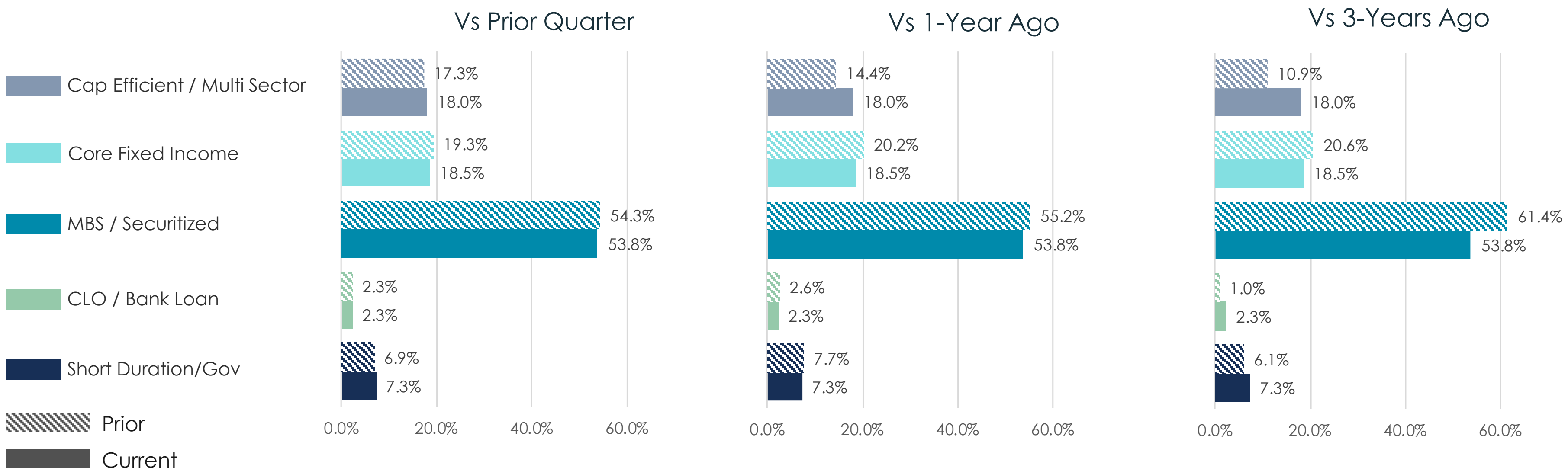
2026-Q1 Weights

Multi Sector / Dynamic	18.0%
Core Fixed Income	18.5%
MBS / Securitized	53.8%
CLO / Bank Loan	2.3%
Short Duration / Gov	7.3%

Black line (right axis) shows aggregate assets comprised in our study (number of participants have grown over time)

The aggregate assets black line decreases in 2022 due to the study's assets reported at MV which suffered losses while wrapped BOLI is reported as BV on Bank Call Reports

Recent Allocation Changes



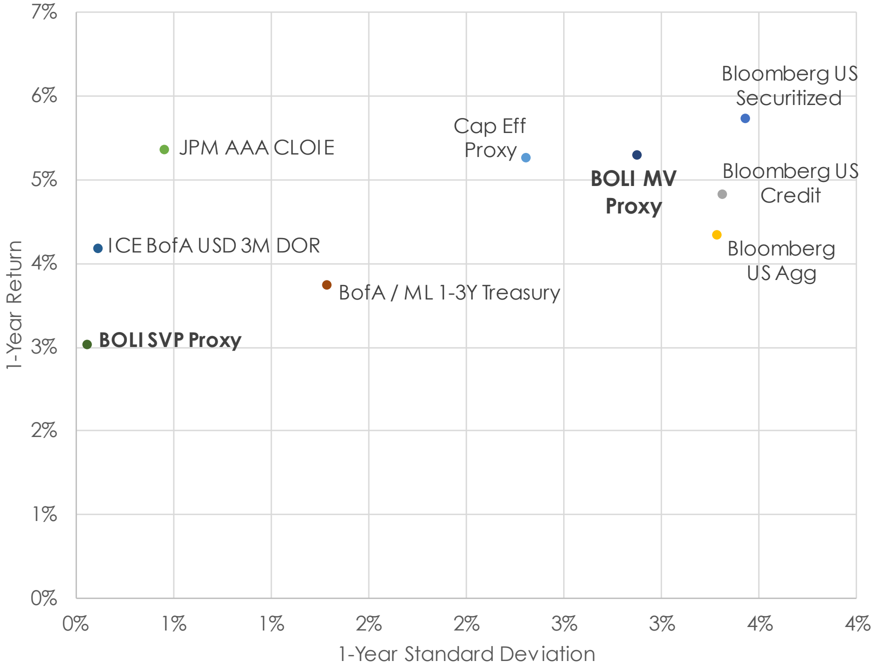
Investment Performance Proxy

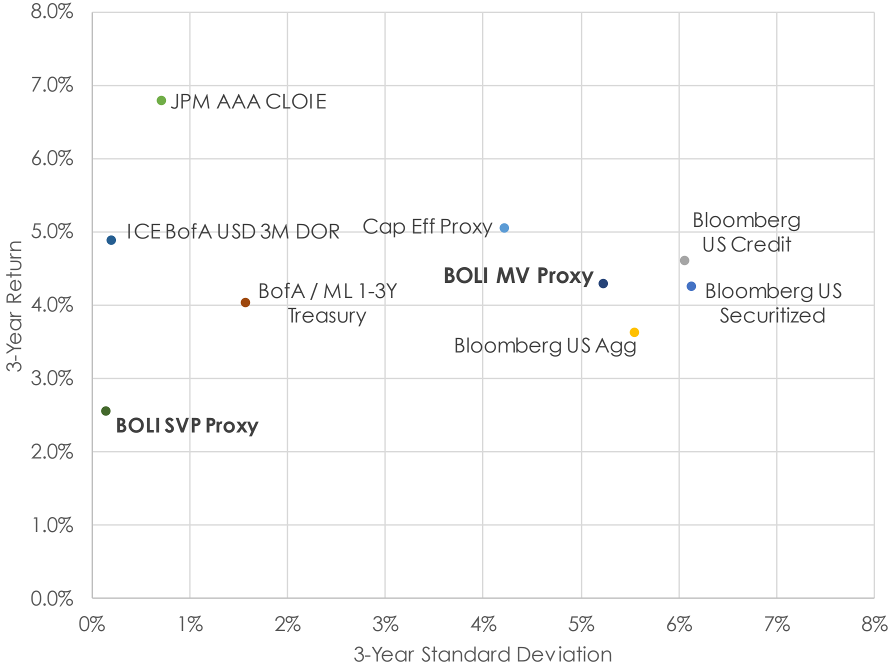
Using common benchmarks for the categories, a proxy for the industry's SA Q1 MV performance is estimated at 0.35%

	Benchmark	Quarter	1-Year	3-Year	5-Year	Weights
Cap Efficient / Multi Sector	[Proxied by a sector blend]	0.34%	5.28%	4.98%	2.12%	18.04%
Core Fixed Income	*Bloomberg US Agg*	-0.05%	4.35%	3.63%	0.31%	18.54%
MBS / Securitized	*Bloomberg US Securitized*	0.40%	5.75%	4.26%	0.54%	53.80%
CLO / Bank Loan	*CLOE Index*	1.01%	5.38%	6.79%	4.80%	2.33%
Short Duration / Gov	*ICE BofA USD 3M DOR*	0.89%	4.19%	4.89%	3.41%	7.30%
Industry Proxy MV Performance using rolling weights:		**0.35%**	**5.31%**	**4.29%**	**0.85%**	
Industry Proxy Stable Value Performance:		0.79%	3.04%	2.55%	2.30%	

Stable Value performance represents book value growth of the industry proxy under a standard crediting rate formula beginning (MV=BV) in 2013

1 & 3-Year Risk/Return Plots with BOLI



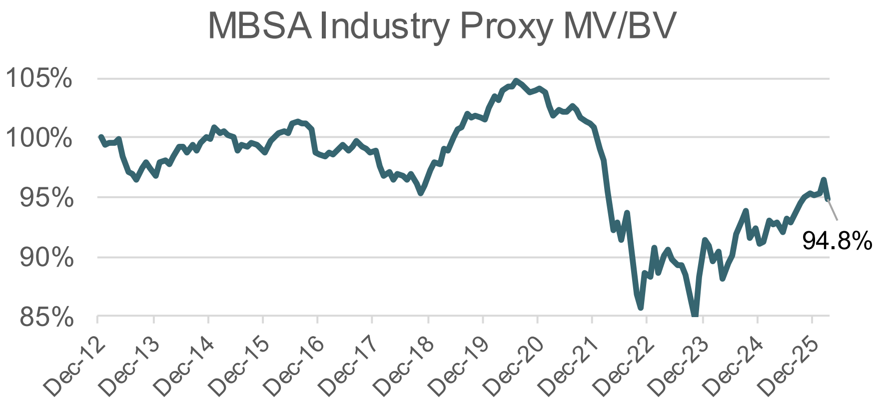


Data as of 2026-Q1

Industry MV/BV Ratio Developments

Using our proxy MV and BV performance monitoring from the prior page, we calculate a proxy MV/BV ratio for the industry.

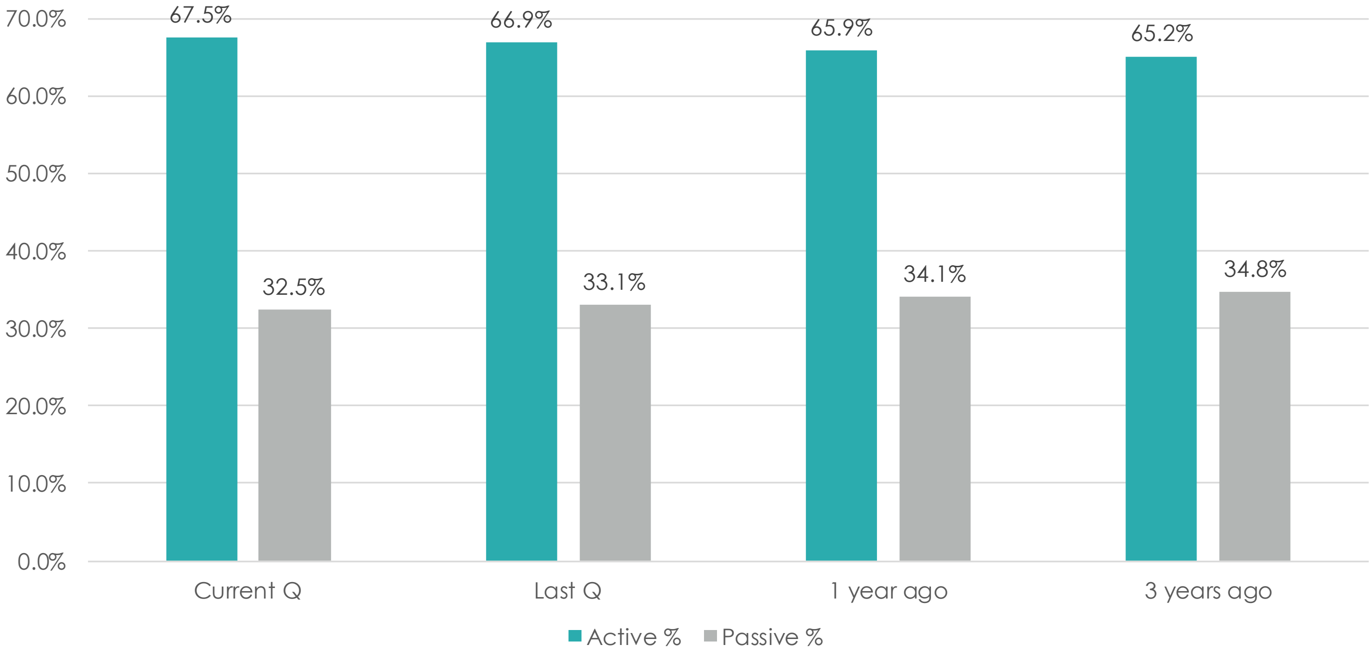
- Markets had a negative Q1, starting with a neutral January and a strong February, but ending with a poor March. Overall, the proxy ratio decreased ~0.4% from Q4 to Q1.



- Compared against aggregate carrier data, the proxy matches well.

Stable Value performance represents book value growth of the industry proxy under a standard crediting rate formula beginning (MV=BV) in 2013

Active / Passive Management Breakdown



Legislative, Regulatory, Judicial, Tax and Accounting Updates

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Noteworthy Judicial Developments

[No Judicial Items Covered This Quarter]

- To view prior quarter topics, please visit the LRA Library on our website.

Noteworthy Tax Developments

[No Tax-Related Items Covered This Quarter]

- To view prior quarter topics, please visit the LRA Library on our website.

Noteworthy Accounting Developments

[No Accounting-Related Items Covered This Quarter]

- To view prior quarter topics, please visit the LRA Library on our website.

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Noteworthy Regulatory Developments

Basel III Endgame – Regulators Release Proposed Regulatory Capital Rules (Mar)

- The FDIC, Federal Reserve Board, and the OCC jointly announced the release of three separate regulatory capital rule proposals concerning the following:
    - Basel III Regulatory Capital Framework (Regulatory Capital Rule: Category I and II Banking Organizations, Banking Organizations with Significant Trading Activity, and Optional Adoption for Other Banking Organizations);
    - Standardized Approach for Risk-weighted Assets (Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-weighted Assets); and
    - GSIB Surcharge (Regulatory Capital Rule: Risk-Based Capital Surcharges for Global Systemically Important Bank Holding Companies; Systemic Risk Report (FR Y-15)).
- The proposals are open for comment until June 18. We have reviewed the proposals in detail. Attached is a summary that has three sections:
    - High Level Comparison of Proposed Rule to Current Rules
    - In Depth Review of Proposal for Certain Exposure Types
    - Overall Discussion Topics for BOLI
- ...Continued

Noteworthy Regulatory Developments

Basel III Endgame – Regulators Release Proposed Regulatory Capital Rules (Mar) continued

Standardized Approach Highlights

- Corporate exposures drop from 100% to 95%
- Securitizations become subject to SEC-SA
    - ❖ This is very similar to current SSFA
    - ❖ The floor drops to 15% from 20%
    - ❖ The "p" parameter is not increased, so overall, we anticipate lower RWs for exposures at the top of the capital structure
    - ❖ Calculating the Kg parameter under this proposal could be a little more challenging (though more so for the largest banks)
        - Residential real estate RWs are proposed to be based on LTV and whether or not the exposure is dependent on cash flows from the real estate
- Derivatives and Cleared Transactions – banks can either continue using the CEM or switch to the SA-CCR approach
- Investment fund exposures (which includes SA BOLI) are unchanged for Standardized Approach

- ...Continued

Noteworthy Regulatory Developments

Basel III Endgame – Regulators Release Proposed Regulatory Capital Rules (Mar) continued

Highlights for Advanced Approach Banks (“ERBA”)

- Proposes to only require banks to use the ERBA (not also calculate RWA under standardized approach)
- Investment grade corporate exposures drop from 100% to 65%
- Depository institution RWs generally increase from 20% to 30-40% (depending on specified factors)
- Equity exposures and investment fund exposures (which includes SA BOLI) are largely unchanged
- Investment fund exposures are subject to a 20% RW floor
- The proposal explicitly excludes SA BOLI from scope of the Market Risk Capital rules

Overall, we anticipate the proposal would result in slightly lower overall RWA for BOLI assets. The most significant impacts would be for large banks’ General Account exposures (dropping from 100% to 65%) and senior securitization exposures within SA BOLI (dropping from 20% to 15%).

Noteworthy Regulatory Developments

Agencies Issue Final Rule to Prohibit Use of Reputation Risk by Regulators (Apr)

- On April 7 the OCC and FDIC jointly issued a final rule that codifies the elimination of reputation risk from their supervisory programs. Under the final rule, the agencies will not criticize, formally or informally, or take adverse action against an institution on the basis of reputation risk. The rule defines "reputation risk" as follows:
  - Reputation risk means any risk, regardless of how the risk is labeled by the institution or regulators, that an action or activity, or combination of actions or activities, or lack of actions or activities, of an institution could negatively impact public perception of the institution for reasons not clearly and directly related to the financial or operational condition of the institution.
- The final rule includes several specific conforming edits that remove "reputation risk" and related sentences from existing regulations. However, this final rule does not appear to expressly change existing supervisory guidance. We suspect that such portions of guidance are effectively moot given the overarching prohibition on regulators' use of reputation risk in the supervisory process.
- The final rule is set to become effective on June 9 (i.e., 60 days after publication in the Federal Register).

Noteworthy Regulatory Developments

Agencies Issue Updated Model Risk Management Guidance (Apr)

- On April 17 the OCC (OCC Bulletin 2026-13), FDIC (FIL-15-2026) and Federal Reserve Board (SR 26-2) jointly issued updated model risk management guidance. The updated guidance serves in part to rescind prior model risk management guidance (including OCC 2011-12, among others) and to clarify that model risk management practices should be risk-based, tailored, and commensurate with a banking organization's size, complexity, and extent of model use.
- Under the updated guidance, the term "model risk" refers to the potential for adverse financial consequences associated with models, which may result from decisions made based on model output.
- The guidance describes considerations and best practices relating to Model Development, Model Use, Model Validation and Monitoring, and Governance.
- According to the press release, the updated guidance does not set forth enforceable standards or prescriptive requirements, and non-compliance will not result in supervisory criticism.

Noteworthy Legislative Developments

Louisiana Proposed Legislation for BOLI 1035 Exchanges (Apr)

- A bill has been introduced in the Louisiana state senate (SB 509) that is directed toward BOLI exchanges – particularly exchanges of policies covering former employees. While we support the bill's aim of clarifying that exchanges of policies covering former employees are permissible, as drafted, the bill has the following problems:
  - It requires the replacement policy to be "of the same type";
  - It requires the replacement policy to have the same "death benefit amount"; and
  - It requires written consent of the former employee.
- Same Type of Insurance
  - The bill doesn't clarify what would be meant by being the "same type" of life insurance. One possible interpretation within BOLI would be the same structure (e.g., General Account, Hybrid, or Separate Account). Another possibility would be whole life versus universal life. In any event, this restriction doesn't make sense, particularly since the IRS has specific regulations addressing what types of contracts can be exchanged under Section 1035.
- Same Death Benefit Amount
  - A provision requiring the same death benefit amount is unworkable. Unless a policy has a death benefit that is greater than the amount required under IRC 7702, the policy's death benefit will change based on the contract's cash surrender value. Similarly, in a 1035 exchange, the new policy's death benefit must comply with IRC 7702. Simply complying with IRC 7702 oftentimes results in a different death benefit (either higher or lower) amount under a 1035 exchange.
  - We suspect the drafter sought to ensure that a permissible exchange wasn't being conducted to materially increase the amount of life insurance coverage on a former employee. We agree that such an action would be improper without the affirmative consent of the insured
- Continued...

Noteworthy Legislative Developments

Louisiana Proposed Legislation for BOLI 1035 Exchanges (Apr) Continued

- Written Consent Required
  - ❖ Consistent with our commentary above, we support a consent requirement if a 1035 exchange is going to include a material increase in the life insurance coverage that is validly in force on a former employee's life. However, setting that aside, we don't see any practical benefit to seeking or requiring an insured's consent on a 1035 exchange. Such a request for consent may be quite confusing to the former employee – raising questions about how the transaction may affect the person individually (when it has no effect on the person).
  - ❖ Typically, some combination of the following facts exist:
    - The insured (when employed) affirmatively consented to be insured under a BOLI policy
    - The consent explicitly states that the bank will pay all premiums and be the sole owner of the policy
    - The consent explicitly states that the bank will continue to own the policy after the employee's employment terminates for any reason
    - The BOLI policy was originally purchased in connection with supporting an employee benefit plan.
  - ❖ As such, an employee that consented to be insured fully understood that such coverage would be maintained beyond the employee's employment period. Asking for a consent to exchange existing coverage for coverage that is better suited to the policyowner's needs does not strike us as a necessary or worthwhile exercise
- Bill Status
  - ❖ As of 5/1/2026, the bill was nearing passage in the LA State Senate (potentially scheduled to be passed on 5/4/2026). Our understanding of the LA legislative process is as follows:
    - A bill that passes in the originating chamber (e.g., Senate in this instance) then gets transmitted to the other chamber (e.g., the House in this instance) for consideration.
    - The House can pass it as drafted, amend the bill, or not pass the bill.
    - If the bill is passed by the second chamber, a reconciliation process ensues.
    - A final, reconciled bill is presented to the Governor who may sign it, veto it, or allow it to become law without signature.
- We have been in contact with the Louisiana Bankers Association and others to propose amendments to the bill that would better preserve banks' rights in the state of Louisiana.
- Continued via May Update…

Noteworthy Legislative Developments

Louisiana Proposed Legislation for BOLI 1035 Exchanges (May)

- Last month, we described proposed legislation in Louisiana addressing banks' rights to execute 1035 exchanges on policies covering former employees (SB 509). We had concerns with the proposal and engaged in outreach to try to improve the legislation. Our outreach included discussions and correspondence with the Louisiana Bankers Association, the insurance agent behind the legislation, and certain insurance companies.
- After considerable discussion, an amended bill passed both the Louisiana House and Senate and was sent to Governor Landry on May 29.
- The proposed law now has two primary elements:
  - The current insurable interest statute is amended to explicitly state that a bank "shall be deemed to maintain its insurable interest in a former employee for the purposes of exchanging one bank-owned life insurance contract for another."
  - The law instructs the Louisiana insurance commissioner to "determine the method and manner in which a bank may obtain consent for the exchange."
- Louisiana's legislature posts videos of its proceedings. The following videos include discussion of this bill:
  - 2026-05-26 House discussion and passage
    - LA House On-Demand Video
    - SB 509 Coverage: 3H:35M to 4H:24M
  - 2026-05-19 House Insurance Committee Deliberation
    - LA House On-Demand Video
    - SB 509 Coverage: First 59 minutes
  - 2026-05-19 House Insurance Committee Deliberation
    - LA House On-Demand Video
    - SB 509 Coverage: From 7 min to 25 min
- Continued…

Noteworthy Legislative Developments

Louisiana Proposed Legislation for BOLI 1035 Exchanges (May) Continued

- Among the legislators that voted against the bill, the concerns raised were primarily around consent and the handling of sensitive data. Of these, some appeared to believe that the insureds were the owners of the policies (e.g., in the context of a collateral assignment split dollar arrangement) and, therefore, consent should be required.
- Among the legislators that voted for the bill, there appeared to be support for banks to be able to improve the performance of insurance assets without efforts to track down and/or reobtain consent from the insureds.
- We will continue to monitor to see if Governor Landry passes or vetoes this bill. Assuming it passes, we will monitor for clarification from the Louisiana Department of Insurance as to consent requirements for former employees.

Noteworthy Legislative Developments

Senator Wyden Releases Updated Proposed Legislation Targeting Private Placement Life Insurance (Apr)

- On April 13 Senator Wyden (re)released draft legislation targeting Private Placement Life Insurance (PPLI) contracts. Upon review, it appears to be virtually unchanged from a previous version we covered in our December 2024 LRA update.
- Summary
  - ❖ The proposal would add Section 7702C ("Treatment of Applicable Private Placement Contracts") to the Internal Revenue Code. A contract that is deemed to be a Private Placement Contract ("PPC") would not be treated as an insurance or annuity contract. Therefore, such a contract would be subject to tax on the inside build-up and on any death proceeds in excess of basis.
  - ❖ In general, a PPC is defined as any private placement contract whose underlying segregated asset account does not support at least 25 private placement contracts owned by unrelated parties. Additionally, each asset of a separate account must support each underlying contract on a pro rata basis.
  - ❖ The proposal would be effective upon the date of enactment, applying to existing contracts as well as new contracts. For existing contracts, all prior earnings must be taken into account. The proposal provides limited transition relief under which an existing contract has 180 days to be exchanged or converted to a non-PPC.
  - ❖ In total, the proposal appears highly skeletal and looks to grant broad authority to the IRS to implement the proposal in a feasible manner.
- Status
  - ❖ This legislation is not expected to progress in the current Congress.
  - ❖ A one-page summary of the proposal is available here. A section-by-section summary is available here. Legislative language is available here.

Noteworthy Legislative Developments

Florida Bill to Restrict Employer-Owned Life Insurance Dies in Committee (Apr)

- As an update to our November 2025 LRA Update, the proposed bill (HB 261) that would have been materially adverse to BOLI/COLI has "Died in Insurance & Banking Subcommittee."
- The related version of the bill in the FL Senate (SB 894) is also marked as dead

Other Noteworthy Developments

House Financial Services Committee Hearing on Financial Privacy Framework (Mar)

- On March 17, the House Committee on Financial Services held a hearing titled "Updating America's Financial Privacy Framework for the 21st Century." The discussion centered around whether the Gramm-Leach-Bliley Act (GLBA) should be updated and whether a federal financial privacy law should preempt various state privacy laws.
- Witnesses included a partner from Morrison Foerster (Nathan Taylor), whose written testimony included background information on financial privacy laws (including GLBA) and discussion of possible updates.
- The committee also discussed preliminary draft legislation that would modify title V of the GLBA. It remains unclear to us whether any of the deliberations would have a direct or indirect impact on BOLI/COLI if passed. Aspects that we think merit ongoing monitoring include:
    - ❖ Consumer Right to Access: Should individuals have a right to access (e.g., request a copy or disclosure) any non-public information that a financial institution maintains?
    - ❖ Right to Delete or "Opt Out": If individuals are granted rights under GLBA to request deletion of data, what scope and circumstances will apply?
    - ❖ Scope and Applicability: Will revised legislation be in scope for insurance companies? Will "consumer/customer" include current and/or former employees?
- The NAIC submitted a comment letter opposing the draft legislation, particularly as it relates to federal preemption. The NAIC noted that every state has adopted the NAIC's Privacy of Consumer Financial and Health Information Regulation (Model #672).
- The ACLI also released a statement. It appeared to be supportive of modernizing the GLBA but encouraged lawmakers to specifically address consumers' ability to access life insurance services and products.

Insurance Company and Counterparty Updates

Current S&P Financial Strength Ratings

Insurance Carriers Rated AAA

- None

Insurance Carriers Rated AA+

- Guardian Life Insurance Company of America
- Massachusetts Mutual Life Insurance Co.
- New York Life Insurance and Annuity Corporation
- New York Life Insurance Company
- Northwestern Mutual Life Insurance Company

Insurance Carriers Rated AA

- Canada Life Assurance Co. (US Branch)
- Empower Annuity Insurance Company of America
- USAA Life Insurance Company
- Zurich Insurance Company

Insurance Carriers Rated AA-

- John Hancock Life Insurance Company (USA)
- Metropolitan Life Insurance Company
- Metropolitan Tower Life Insurance Company
- Minnesota Life Insurance Company
- Pacific Life Insurance Company
- Protective Life Insurance Company
- Pruco Life Insurance Company
- Prudential Insurance Company of America

Insurance Carriers Rated A+

- American General Life Insurance Company
- Ameritas Life Insurance Corp
- Athene Annuity and Life Company
- Equitable Financial Life Insurance Company
- Equitable Financial Life Insurance Company of America
- Lincoln National Life Insurance Company
- Midland National Life Insurance Company
- MONY Life Insurance Company
- National Life Insurance Company of Vermont
- Nationwide Life & Annuity Insurance Company
- Nationwide Life Insurance Company
- Principal Life Insurance Company
- Reliastar Life Insurance Company
- Transamerica Life Insurance Company
- U.S. Life Insurance Company in The City of NY

Insurance Carriers Rated A

- Brighthouse Life Insurance Company
- Connecticut General Life Insurance Company
- Jackson National Life Insurance Company
- Symetra Life Insurance Company

Insurance Carriers Rated A-

- Delaware Life Insurance Company

Insurance Carriers Rated BBB+

- Talcott Resolution Life Insurance Company

Insurance Carriers Not Rated

(Rating at withdrawal)

- Everlake Life Insurance Company (A+)
- American Heritage Life Insurance Company (A)
- Zurich American Life Insurance Company (A)
- Augustar Life Insurance Company (BBB+)
- Security Life of Denver Insurance Company (BBB+)
- Lincoln Benefit Life Company (BBB)

*Categories based on S&P's Financial Strength Rating as of May 15, 2026

Current Fitch Financial Strength Ratings

Insurance Carriers Rated AAA

- New York Life Insurance and Annuity Corporation
- New York Life Insurance Company
- Northwestern Mutual Life Insurance Company

Insurance Carriers Rated AA+

- Massachusetts Mutual Life Insurance Co.

Insurance Carriers Rated AA

- Canada Life Assurance Co. (US Branch)
- Empower Annuity Insurance Company of America
- John Hancock Life Insurance Company (USA)
- Minnesota Life Insurance Company
- Zurich Insurance Company

Insurance Carriers Rated AA-

- Metropolitan Life Insurance Company
- Metropolitan Tower Life Insurance Company
- MONY Life Insurance Company
- Pacific Life Insurance Company
- Principal Life Insurance Company
- Protective Life Insurance Company
- Pruco Life Insurance Company
- Prudential Insurance Company of America

Insurance Carriers Rated A+

- American General Life Insurance Company
- Athene Annuity and Life Company
- Connecticut General Life Insurance Company
- Lincoln National Life Insurance Company
- Midland National Life Insurance Company
- Reliastar Life Insurance Company
- Security Life of Denver Insurance Company
- U.S. Life Insurance Company in The City of NY

Insurance Carriers Rated A

- Augustar Life Insurance Company
- Jackson National Life Insurance Company

Insurance Carriers Rated A-

- Brighthouse Life Insurance Company
- Delaware Life Insurance Company
- Talcott Resolution Life Insurance Company

Insurance Carriers Not Rated
(Rating at withdrawal)

- USAA Life Insurance Company (AAA)
- Guardian Life Insurance Company of America (AA+)
- West Coast Life Insurance Company (AA-)
- Symetra Life Insurance Company (A+)
- Transamerica Life Insurance Company (A+)
- American Heritage Life Insurance Company (A)
- Equitable Financial Life Insurance Company (A)
- Equitable Financial Life Insurance Co of America (A)
- National Life Insurance Company of Vermont (A)
- Nationwide Life Insurance Company (A)
- Everlake Life Insurance Company (BBB)
- Lincoln Benefit Life Company (BBB)

- Ameritas Life Insurance Corp
- Nationwide Life & Annuity Insurance Company
- Nationwide Life Insurance Company
- Zurich American Life Insurance Company

*Categories based on Fitch's Financial Strength Rating as of May 15, 2026

Current Moody's Financial Strength Ratings

Insurance Carriers Rated Aaa

- None

Insurance Carriers Rated Aa1

- Guardian Life Insurance Company of America
- New York Life Insurance and Annuity Corporation
- New York Life Insurance Company
- Northwestern Mutual Life Insurance Company
- USAA Life Insurance Company

Insurance Carriers Rated Aa2

- Zurich Insurance Company

Insurance Carriers Rated Aa3

- Canada Life Assurance Co. (US Branch)
- Empower Annuity Insurance Company of America
- John Hancock Life Insurance Company (USA)
- Massachusetts Mutual Life Insurance Co.
- Metropolitan Life Insurance Company
- Metropolitan Tower Life Insurance Company
- Minnesota Life Insurance Company
- Pacific Life Insurance Company
- Pruco Life Insurance Company
- Prudential Insurance Company of America

Insurance Carriers Rated A1

- Athene Annuity and Life Company
- Equitable Financial Life Insurance Company
- Equitable Financial Life Insurance Co. of America
- MONY Life Insurance Company
- National Life Insurance Company of Vermont
- Nationwide Life & Annuity Insurance Company
- Nationwide Life Insurance Company
- Principal Life Insurance Company
- Protective Life Insurance Company
- Symetra Life Insurance Company
- Transamerica Life Insurance Company

Insurance Carriers Rated A2

- American General Life Insurance Company
- Connecticut General Life Insurance Company
- Lincoln National Life Insurance Company
- Reliastar Life Insurance Company
- Security Life of Denver Insurance Company
- U.S. Life Insurance Company in The City of NY

Insurance Carriers Rated A3

- Brighthouse Life Insurance Company
- Jackson National Life Insurance Company

Insurance Carriers Rated Baa1

- Augustar Life Insurance Company
- Talcott Resolution Life Insurance Company

Insurance Carriers Not Rated

(Rating at withdrawal)

- American Heritage Life Insurance Company (Aa3)
- Midland National Life Insurance Company (A2)
- Everlake Life Insurance Company (A3)
- Zurich American Life Insurance Company (A3)
- West Coast Life Insurance Company (A1)
- Lincoln Benefit Life Company (Baa1)
- Delaware Life Insurance Company (Baa2)

- Ameritas Life Insurance Corp

*Categories based on Moody's Insurance Financial Strength Rating as of May 15, 2026

Ratings or Outlook Revisions

American General Life Insurance Company
Corebridge Financial Inc.
U.S. Life Insurance Company in the City of NY

- Outlook changed from stable to negative watch by S&P (Apr)
- Rating changed from stable to positive by Fitch (Apr)

Equitable Financial Life Insurance Company
Equitable Financial Life Insurance Company of America

- Outlook changed from stable to negative watch by S&P (Apr)
- Ratings placed under review for downgrade by Moody's (Apr)

Prudential Financial Corporation
Pruco Life Insurance Company
Prudential Insurance Company of America

- Fitch changed the outlook from stable to Rating Watch Negative, citing the voluntary 270-day sales suspension of Prudential Life Insurance Company, Ltd. (see following page) (May)

Industry Developments

Corebridge and Equitable Proposed Merger (Apr)

- On March 26, Corebridge and Equitable Holdings announced a proposed merger. Upon closing of the transaction, the combined company will operate under the Equitable name. The combined company has a valuation of approximately $22 billion based on the stock prices prior to the announcement of the merger. The transaction is expected to close by year-end 2026, subject to closing conditions.

AIG Announces Sale of Remaining Stake in Corebridge (May)

- On May 5, AIG announced the sale of its remaining stake in Corebridge. The sale resulted in approximately $710 million in proceeds to AIG. The sale is the final portion of a five-year planned separation between AIG and Corebridge. AIG initially spun-off Corebridge through an IPO in 2022.

Prudential of Japan Sales Suspension (May)

- On April 21, Prudential Financial and its Japanese subsidiary, Prudential Life Insurance Company, Ltd., announced a voluntary extension of the suspension of new sales activity for an additional 180 days. Prudential initially implemented a 90-day suspension on February 9, 2026. Prudential's original press release noted that the sales suspension related to misconduct involving inappropriate investment solicitations by certain Prudential of Japan employees.

S U B S C R I P T I O N   S E R V I C E S

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Custom Reports

Net Rating Changes by Period (Number of Notches)					
2022 Q1	2021 Q4	2022 YTD	2021	2020	2019
-	-	-	-	-	1
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-2	-	1
-	-	-	-1	-	-
-	-	-	-1	-	-1
			-	-	-
				-	1
			-	-	-

Custom reports show historical changes to ratings to view stability and trends over time

Insurance Carriers	Current Financial [illegible]th Ratings			Net Rating Changes by Period (Number of Notches)											
	Agency	Rating	Outlook	2019 Q4	2019 Q3	2019 YTD	2018	2017	2016	2015	2014	2013	2012	2011	2010
Carrier 1	S&P	A+	Stable	-	-	-	-	-	-	-	-	-	-	-	-1
	Fitch	A+	Positive	-	-	-	1	-	-	1	-	-	-	-	-1
	Moody's	A2	Stable	-	-1	-1	-	-	-	-	-	-	-	-	-
Carrier 2	S&P	AA	Stable	-	-	-	-	-	-	-	-	-	-	-	-
	Fitch	AA	Stable	-	-	-	-	-	-	-	-	-	-	-	-1
	Moody's	Aa3	Stable	-	-	-	-	-	-	-	-	-	-	-	-
Carrier 3	S&P	A	Negative	-	-	-	-2	-	-	-	1	1	-	-	-
	Fitch	A	Stable	-	-	-	-1	-	-	-	1	-	-	-	-
	Moody's	A2	Stable	-	-	-	-1	-	-	-	1	-	-	-	-

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