

STATEMENT OF ANTITRUST POLICY

It is LOMA's policy to comply fully with the letter and the spirit of the antitrust laws. LOMA's antitrust policy, rules of conduct, and compliance procedures govern all LOMA activities. LOMA's antitrust policy is intended to do two things: (1) to make the occurrence of an actual antitrust violation in the course of LOMA activities impossible, and (2) to prevent inadvertent conduct which might give the appearance of an antitrust violation to someone unfamiliar with LOMAs nature and purposes. The policy, rules, and procedures are designed to protect you, your employer and LOMA from any accusation of wrongdoing arising out of your participation in LOMA activities.

It is the responsibility of every LOMA member and every participant in LOMA activities to be guided by LOMA's policy of strict compliance with the antitrust laws in all LOMA activities. It shall be the special responsibility of committee and council chairpersons, LOMA staff representatives, and LOMA's officers and directors to ensure that this policy is known and adhered to in the course of activities pursued under their leadership. Please be aware that violation of LOMA's antitrust compliance policy by any individual will result in disciplinary action, which may include suspension from participation in LOMA activities and immediate removal from any LOMA office held by a person violating this policy.

LOMA's General Rules of Antitrust Compliance and Guidelines for Committee Operations will assist the LOMA staff and LOMA's officers, directors and committee and council leaders in recognizing situations, which may raise the appearance of an antitrust problem. However, general rules and guidelines cannot cover every potential situation that might have antitrust implications. If you have any question about the legality of any LOMA activity, you should contact LOMA immediately. LOMA will make available expert legal advice when questions arise as to the manner in which the antitrust laws may apply to the activities of LOMA or any of its committees or task forces.

Any questions you or your company's legal counsel may have concerning LOMA's antitrust compliance program should be directed to:

Curtis H. Conner, FLMI, CPA
Senior Vice President, Treasurer and Chief Financial Officer
LOMA
300 Day Hill Road
Windsor, CT 06095-4761
Phone: 770-951-1770

Thank you for your cooperation.

Sincerely,



Robert A. Kerzner, CLU, ChFC
President and CEO

GENERAL RULES OF ANTITRUST COMPLIANCE

1. **No Anticompetitive Agreements or Understandings**

Neither LOMA nor any committee or activity of LOMA shall be used for the purpose of bringing about or attempting to bring about any agreement, written or oral, formal or informal, express or implied, among competitors regarding:

- a. prices, premiums, interest rates, or other terms or conditions of any products to be offered for sale by insurance companies;
- b. the kinds of products to be offered;
- c. the customers to whom any insurance company product may be sold; or
- d. the territories in which such product may be sold,

2. **No Discussion of Prices, Interest Rates, Etc.**

No LOMA activity shall include discussion for any purpose or in any fashion of prices, premiums, interest rates or other terms or conditions of any products to be offered for sale by insurance companies.

3. **No Exchange of Pricing Data**

No LOMA committee or group shall undertake any activity which involves exchange or collection and dissemination among competitors of any information regarding prices, premiums, interest rates, or other financial terms or conditions of any products to be offered for sale by insurance companies.

Projects involving the collection of individual firm statistical data shall involve only aggregate data from past transactions and shall include effective steps to protect against disclosure of individual company product pricing, interest payment or employee compensation information.

4. **Exchange of Cost Information — Prohibited Purposes**

No LOMA activity shall include any discussion of costs, or any exchange of cost information, for the purpose or with the probable effect of:

- a. increasing, maintaining or stabilizing prices, premiums, interest rates, or other terms or conditions of insurance company products;
- b. reducing competition with respect to the range or quality of products or services offered by insurance companies; or
- c. promoting agreement among insurance companies with respect to their selection of products or services for purchase, their choice of suppliers, or the prices they will pay for products or services, including commissions for the services of commissioned agents.

5. **Published Papers**

Papers published by LOMA or presented in connection with LOMA programs should not discuss or refer to prices, premiums, interest rates, or other terms or conditions of insurance products offered for sale by insurance companies. Reference to costs in such papers should not be accompanied by any suggestion, expressed or implied, that premiums, interest rates, or other terms or conditions of insurance company products should be raised, adjusted or maintained in order to reflect such costs.

6. **Author Notification**

Authors of conference papers shall be informed of LOMA's antitrust compliance rules and the need to comply with these rules in the preparation and presentation of their papers.

7. **Exclusion from LOMA Activities**

No person shall be arbitrarily or unreasonably excluded from participation in any LOMA committee or activity, where such exclusion may impair such person's ability, or the ability of his or her employer, to compete effectively in the life insurance industry or as a supplier to the life insurance industry.

8. **Product Standardization**

Neither LOMA nor any LOMA committee or group shall make any effort to bring about the standardization of any insurance product for the purpose or with the effect of preventing the development or sale of any product not conforming to a specified standard.

9. **Independent Dealings with Suppliers**

No LOMA activity or communication shall include any agreement, or any discussion which might be construed as an agreement, to collectively refrain from purchasing any equipment, services or supplies from any supplier.

NOTE: All participants in LOMA activities are expected to comply with the foregoing rules and LOMA's antitrust policy, not only at formal LOMA meetings, but also during informal discussions and informal activities that take place in connection with or around LOMA meetings.

GUIDELINES FOR COMMITTEE OPERATIONS

DO'S and DON'T'S for Committee Leaders

- **DO** send the agenda for all meetings to LOMA headquarters 15 days prior to the meeting for review by the responsible staff member.
- **DO** follow the approved agenda and avoid discussion of non-agenda topics.
- **DO** send draft minutes of all meetings to LOMA for review within 15 days after the meeting.
- **DO** familiarize yourself with LOMA's Antitrust Policy and General Rules of Antitrust Compliance prior to each meeting.
- **DO** stop any discussion of prices, premiums, or interest rates.
- **DO** stop any discussion of competition, fair or unfair, between or among industry members.
- **DO** advise all meeting attendees to observe LOMA's General Rules of Antitrust Compliance in informal conversations as well as formal LOMA activities.
- **DO NOT** undertake any committee activity involving collection or dissemination of information regarding prices or pricing methods, except with the advice of LOMA legal counsel, obtained through the responsible LOMA staff person.
- **DO NOT** undertake any committee activity involving collection of individual firm statistical data or dissemination of any compilation of such data, except with the advice of LOMA legal counsel, obtained through the responsible LOMA staff person.
- **DO NOT** undertake any activity to establish a product standard or specification, except with the advice of LOMA legal counsel, obtained through the responsible LOMA staff person.
- **DO NOT** place constraints on committee membership, other than based on a member's technical qualifications or corporate responsibilities in the area covered by the committee and the willingness of the committee member to participate actively in the committee work.
- **DO NOT** set a numerical limit on committee size, unless committee membership rotates on a regular basis. You may set a numerical limit on the maximum number of representatives per company.

MEETINGS PROCEDURES

The following procedures shall be observed for all meetings held under LOMA sponsorship:

- Meeting organizers shall prepare meeting agendas in advance and forward the agendas to LOMA headquarters, for review prior to all meetings.
- A LOMA staff member familiar with LOMA General Rules of Antitrust Compliance shall be present during all meetings sponsored by LOMA.
- Minutes shall be prepared for all meetings and reviewed by the responsible LOMA staff person, prior to distribution.

SELECTION OF SUPPLIERS AS SPEAKERS

LOMA conferences and seminars are not designed to be sales forums; they are designed to provide a forum for the exchange of technical information. Nevertheless, employees of suppliers to the industry are sometimes asked to participate as speakers or panelists because of their knowledge and experience.

Participation on the program of a LOMA conference or seminar may be viewed by suppliers as a significant competitive opportunity, and the favoring of some suppliers over others can give rise to antitrust problems. The exclusion of a supplier from a panel or program will not be considered an antitrust violation unless it constitutes an unreasonable restraint on competition. The key to “reasonableness” is fair-minded decision-making based upon objective criteria.

In order to be fair to all suppliers and to avoid a charge of acting unreasonably to deprive any suppliers of a significant competitive opportunity, LOMA session developers should, in all cases, observe the following guidelines:

1. No speaker should be chosen with the intent to afford his/her company a competitive advantage, and no speaker should be excluded with the intent to deny any company a competitive opportunity.
2. Speakers should be chosen individually on the basis of objective criteria reasonably related to the educational purpose of the session, such as technical knowledge, experience, professional reputation, and effectiveness as a speaker.
3. The objective criteria to be used in selecting speakers should be established prior to the actual selection of speakers.
4. Supplier participation should be planned so as to minimize any competitive advantage which might arise from participation in a LOMA activity.
5. Consideration should be given by session developers to all available methods for equalizing the competitive opportunity among suppliers.