Report of the Examination of

NGL Insurance Company

Madison, Wisconsin

As of December 31, 2025

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October 12, 2026

Honorable Nathan D. Houdek
Commissioner of Insurance
State of Wisconsin
101 East Wilson Street
Madison, Wisconsin 53703

Commissioner:

In accordance with your instructions, a compliance examination has been made of the affairs and financial condition of:

NGL INSURANCE COMPANY
Madison, Wisconsin

and this report is respectfully submitted.

I. INTRODUCTION

The previous examination of NGL Insurance Company (NGL or the company) was conducted in 2021 as of December 31, 2020. The current examination covered the intervening period ending December 31, 2025, and included a review of such subsequent transactions as deemed necessary to complete the examination.

The examination was conducted using a risk-focused approach in accordance with the National Association of Insurance Commissioners (NAIC) *Financial Condition Examiners Handbook*. This approach sets forth guidance for planning and performing the examination of an insurance company to evaluate the financial condition, assess corporate governance, identify current and prospective risks (including those that might materially affect the financial condition, either currently or prospectively), and evaluate system controls and procedures used to mitigate those risks.

All accounts and activities of the company were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management's compliance with statutory accounting principles, annual statement instructions, and Wisconsin laws and regulations. The examination does not attest to the fair presentation

of the financial statements included herein. If during the course of the examination an adjustment is identified, the impact of such adjustment will be documented separately at the end of the “Financial Data” section in the area captioned "Reconciliation of Surplus per Examination."

Emphasis was placed on those areas of the company's operations that were accorded a high priority by the examiner-in-charge when planning the examination. Special attention was given to the action taken by the company to satisfy the recommendations and comments made in the previous examination report.

The company is annually audited by an independent public accounting firm as prescribed by s. Ins 50.05, Wis. Adm. Code. An integral part of this compliance examination was the review of the independent accountant's work papers. Based on the results of the review of these work papers, alternative or additional examination steps deemed necessary for completing this examination were performed. The examination work papers contain documentation concerning the alternative or additional examination steps performed during the examination.

Independent Actuary's Review

An independent actuarial firm was engaged under a contract with the Office of the Commissioner of Insurance. The actuary reviewed the adequacy of aggregate life and annuity reserves, aggregate accident and health reserves, dividends to policyholders, asset adequacy analysis, and deferred life insurance premiums. The actuary’s results were reported to the examiner-in-charge. As deemed appropriate, reference is made in this report to the actuary's conclusion.

II. HISTORY AND PLAN OF OPERATION

NGL Insurance Company commenced business in 1910 as a stock life insurance company under the name Guardian Life Insurance Company. The name was changed to National Guardian Life Insurance Company (NGLIC) in 1920. The company adopted a plan of mutualization in 1936. Effective January 1, 2026, the company reorganized into a mutual holding company group system with NGLIC converting to a stock insurer. As part of the conversion, the name was changed to NGL Insurance Company. The company is the predominant entity within the group and contains substantially all insurance operations.

Historically, the company offered a variety of both individual and group products including ordinary, universal, term, and interest sensitive whole life insurance, single and flexible premium deferred annuities, disability income and group life, sold through career agents and independent brokers.

In the late 1990s and early 2000s, the company began to change its overall business strategy from internal growth to external growth. The company entered into various mergers and acquisitions, opportunistically acquired blocks of closed insurance policies through assumption reinsurance, and changed its distribution strategy from career agents to wholesale distribution through independent marketing organizations, brokers, and third-party administrators (TPAs).

Accompanied with this change in strategy, the company ceased to market its legacy life and annuity business and started to venture into new product lines, such as preneed products, which are specialized life insurance and annuity products designed to finance and fund funeral plans, and various A&H lines, such as long-term care, dental, vision, and Medicare supplement products.

Starting in the late 2010s and early 2020s, the company shifted its strategy to focus more on its preneed business. The company engaged in the divestment of subsidiaries and the novation or retrocession of certain closed legacy and assumed business. Specifically, Everly Holdings, LLC, acquired 100% of the issued and outstanding shares of Settlers Life Insurance Company from NGL in 2022, and Dayfoward Inc. through Dayforward Intermediate Holdings, LLC acquired 100% of the issued and outstanding shares of Commercial Travelers Life Insurance Company from Insurance Strategies Holdings, LLC (ISH). In 2023, Preneed Reinsurance Company of America was dissolved.

Currently, the company markets three major product lines: preneed, employee benefits, and long-term care, and the company is licensed in all states plus the District of Columbia, except for New York. The distribution channel that the company utilizes is product dependent. Preneed products are marketed through marketing organizations and are administered by the company. Employee benefits products are marketed and administered by various third-party administrators. Employee benefits products are typically 100% ceded to the third-party administrator or an affiliate, with the company generating returns through carrier fees. Long-term care products are marketed and administered by LifeCare Assurance Company (LifeCare) and 50% ceded to John Alden Life Insurance Company (JALIC), a subsidiary of LifeCare.

In 2025, the company collected direct premium in the following states:

California	$206,269,512	22.3%
Michigan	66,078,643	7.2%
Texas	48,776,480	5.3%
Wisconsin	45,982,456	5.0%
Pennsylvania	45,951,182	5.0%
All others	510,181,473	55.2%
Total	$923,239,746	100.0%

The following chart is a summary of premium income as reported by the company in 2025. The growth of the company is discussed in the “Financial Data” section of this report.

Premium Income

Line of Business	Direct Premium	Reinsurance Assumed	Reinsurance Ceded	Net Premium
Group Life	$441,280,762	$ 903,863	$ 20,991,310	$421,193,315
Preneed Life	219,092,095	580,980	8,560,403	211,112,673
Final Expense	5,743,060	2,739,227	4,656,887	3,825,400
Industrial	52,608	22,045	75,168	(515)
Ordinary Individual Life	5,924,513	6,918,491	8,651,688	4,191,316
Universal life	6,078,038	747,118	772,533	6,052,623
Interest Sensitive Life	575,321	243,417	170,393	648,345
Term life	907,525	420,619	268,675	1,059,469
Individual Deferred Annuities	17,272,827	3,858,635	4,973,471	16,157,990
Group Deferred Annuities	24,325,289		727,927	23,597,362
Group A&H - Dental & Vision	159,922,734		159,900,229	22,504
Group A&H - Fixed Indemnity	2,738,078		2,268,541	469,536
Group A&H - Other		94	94	

Line of Business	Direct Premium	Reinsurance Assumed	Reinsurance Ceded	Net Premium
Individual A&H – Dental & Vision	2,397,196		2,397,196	
Individual A&H – Long Term Care	35,032,108		21,959,104	13,073,003
Individual A&H - Med Supp	5,687,610		4,834,468	853,141
Individual A&H – All Other	2,109,808	127,491	2,236,254	1,044
Total All Lines	$929,139,569	$16,561,981	$243,444,343	$702,257,207

III. MANAGEMENT AND CONTROL

Board of Directors

The board of directors consists of thirteen members. The directors are elected annually to serve a one to three-year term. Officers are elected at the board's annual meeting. Members of the company's board of directors may also be members of other boards of directors in the holding company group.

Currently, the board of directors consists of the following persons:

Name	Principal Occupation	Term Expires
Joseph Edward Celentano	CEO and President, NGL	2028
Amie Tamar Goldman	Retired Chief Growth Officer, Agrace	2028
Peter Chesley Gunder	Retired Chief Business Development Officer, American Family Mutual Insurance Company S.I.	2027
Timothy Patrick Hanley	Senior Advisor, Marquette University	2027
David Clifford Holman	Retired Chief Administration Officer/Corporate Secretary, American Family Insurance	2027
Erik Shanley Johnson	Executive Chairman, Hy Cite Enterprises	2029
David Wayne Kruger	Chairman, Fiore Companies	2027
Sherry Anne Manetta	Retired Managing Director, Conning, Inc.	2027
Dan Peter Olszewski	Director, Weinert Center for Entrepreneurship at University of Wisconsin-Madison	2029
John Joseph Oros	Operating Partner, J.C. Flowers & Co.	2027
Tammy Michelle Roou	Retired Chief Risk Officer, Northwestern Mutual	2029
Elease Edmead Wright	Retired Senior Vice President & Chief Human Resources Officer, Aetna Inc.	2028
Gary Joseph Wolter	Retired President & CEO, Madison Gas and Electric Company	2029

Officers of the Company

The officers serving at the time of this examination are as follows:

Name	Office
Joseph Edward Celentano	President, Chief Executive Officer
Kimberly Ann Shaul	EVP, Chief Operating Officer & Chief Legal Officer
Francis Joseph Robertson	SVP, Chief Financial Officer
Scott Joseph Michels	VP, Appointed Actuary
Cara Cristin Capretta	SVP, Chief Human Resources Officer
Jeremy Wade Ragsdale	EVP, Chief Marketing Officer
Andrea Nicole Rouleau	SVP, Chief Actuary
Brian Jason Saperstein	SVP, Chief Information & Chief Digital Officer
Michelle Nicole Niemec	VP, Controller
James Cody Boll Jr	SVP, Deputy General Counsel
David Puckett	SVP, Chief Investment Officer

Committees of the Board

The company's bylaws allow for the formation of certain committees by the board of directors. Also, Wisconsin law requires insurers to designate an audit committee, which was verified as part of the examination that the company's audit committee was designated at the holding company level. The board committees at the time of the examination are listed below:

Governance Committee
Elease Edmead Wright, Chair
Joseph Edward Celentano
Amie Tamar Goldman
Daniel Peter Olszweski
Gary Joseph Wolter

Audit Committee
Sherry Anne Manetta, Chair
Joseph Edward Celentano
Amie Tamar Goldman
Timothy Patrick Hanley
Tammy Michelle Roou
Gary Joseph Wolter

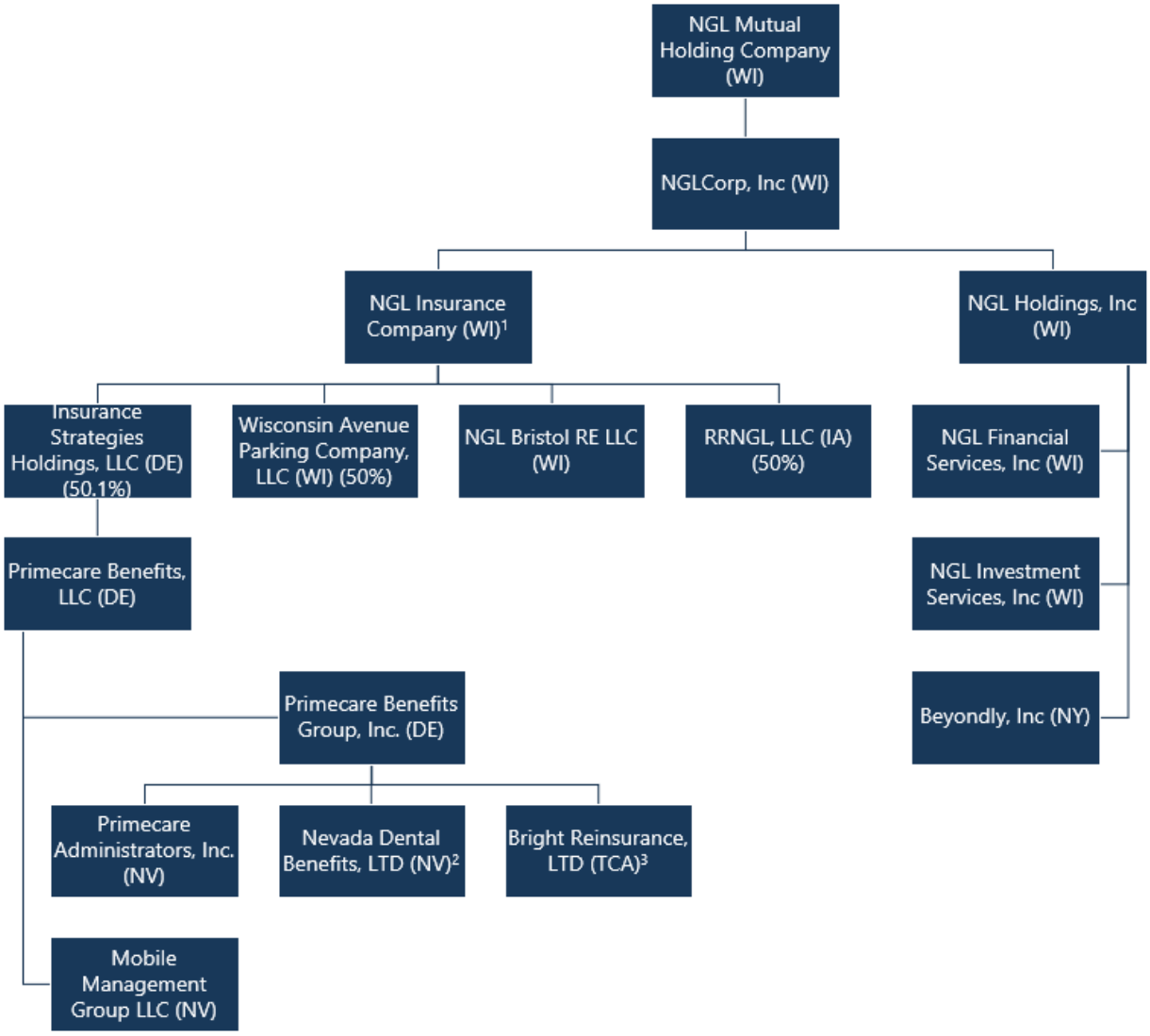
Comp, Talent & Culture Committee
Erik Johnson, Chair
Joseph Edward Celentano
David Wayne Kruger
Gary Joseph Wolter
Elease Edmead Wright

Investment & Finance Committee
David Wayne Kruger, Chair
Joseph Edward Celentano
Peter Chesley Gunder
Timothy Patrick Hanley
David Clifford Holman
Sherry Anne Manetta
John Joseph Oros
Tammy Michelle Roou
Gary Joseph Wolter

IV. AFFILIATED COMPANIES

The company is a member of a holding company system. The ultimate parent is NGL Mutual Holding Company (NGL MHC). NGLCorp, Inc. (NGLCorp) is the holding company for NGL Insurance Company and NGL Holdings, Inc (NGL-H). The mutual holding company reorganization was effective January 1, 2026. Also, NGL-H was sold to NGLCorp effective April 1, 2026. Due to the organizational structure changes in the first and second quarters of 2026, the organizational chart below is as of April 1, 2026. The state of domicile and ownership percentage is shown for each entity under NGLIC and NGL-H. The company is the primary entity within the group, and all the other entities are either ancillary insurance-related support entities or immaterial non-insurance entities. The organizational chart below depicts the relationships among the affiliates in the group. A brief description of the affiliates follows the organizational chart.

Organizational Chart
As of April 1, 2026



[1] All affiliate relationships with their parent are wholly owned subsidiaries unless indicated otherwise.
[2] Nevada Dental Benefits, LTD is a Nevada-domiciled Limited Health Service Organization.
[3] Bright Reinsurance LTD is a Turks & Caicos based reinsurer for BrightBenefits product line.

NGL Mutual Holding Company

NGL MHC is the ultimate parent of the group and is a mutual holding company. It was formed effective January 1, 2026.

NGLCorp, Inc.

NGLCorp is the holding company of NGLIC and NGL-H. It was formed effective January 1, 2026.

NGL Insurance Company

NGLIC provides preneed, long-term care and Employee Benefits Products business through wholesale distribution using independent marketing organizations and brokers in 49 states and the District of Columbia. As of December 31, 2025, the audited financial statements of NGLIC reported assets of $5.3 billion, liabilities of $4.9 billion, and capital and surplus of $465.1 million. Operations for 2025 produced a net income of $9.0 million on total revenue of $997.7 million.

Insurance Strategies Holdings, LLC

Insurance Strategies Holdings, LLC (ISH) is a joint venture for a dental/vision business called BrightBenefits. ISH is domiciled in Delaware. NGLIC has a 50.1% interest in the business and Insurance Capital Group, through its Federal Life Group, Inc. affiliate, owns the other 49.9%. As of December 31, 2025, the unaudited financial statements of ISH reported assets of $10.1 million, liabilities of $240.9 thousand, and equity of $9.9 million. Operations for 2025 produced a net loss of $1.1 million.

Primecare Benefits, LLC

Primecare Benefits, LLC (PCB) is a parent holding company. It is the operating parent for Primecare Benefits Group, Inc. (PCBG) and Mobile Management Group, LLC (MMG). PCB is domiciled in Delaware. These companies provide dental benefits that predominantly serve consumers in Las Vegas, NV. As of December 31, 2025, the unaudited financial statements of PCB reported assets of $12.1 million, liabilities of $3.4 million, and equity of $8.6 million. Operations for 2025 produced a net loss of $1.8 million.

Primecare Benefits Group, Inc.

PCBG is a dental benefits company. PCBG is domiciled in Delaware. It is the operating parent corporation for Primecare Administrators, Inc. (PCA), and Bright Reinsurance, LTD (Bright RE). As of December 31, 2025, the unaudited financial statements of PCBG reported assets of $10.1 million, liabilities of $3.1 million, and equity of $7.0 million. Operations for 2025 produced a net income of $3.2 million.

Primecare Administrators, Inc.

PCA is a third-party administrator for the group's dental benefit plans. PCA is domiciled in Nevada. As of December 31, 2025, the unaudited financial statements of PCA reported assets of $2.1 million, liabilities of $624.8 thousand, and equity of $1.5 million. Operations for 2025 produced a net income of $648.7 thousand.

Nevada Dental Benefits, LTD

Nevada Dental Benefits, LTD (NDB) is a Nevada-domiciled prepaid limited health service organization providing dental coverage in Nevada. As of December 31, 2025, the audited financial statements of PCA reported assets of $11.2 million, liabilities of $6.6 million, and capital and surplus of $4.7 million. Operations for 2025 produced a net income of $684.7 thousand.

Bright Reinsurance, LTD

Bright Reinsurance, LTD (Bright RE) is a Turks & Caicos based unauthorized reinsurer. Bright RE is domiciled in the Turks & Caicos. Bright RE assumes 100% of the BrightBenefits business. As of December 31, 2025, the unaudited financial statements of Bright RE reported assets of $1.8 million, liabilities of $1.7 million, and capital and surplus of $115.0 thousand. Operations for 2025 produced a net loss of $23.2 thousand.

Mobile Management Group LLC

MMG is a wholly-owned liability company of PCB. MMG is domiciled in Nevada. MMG's operations are immaterial.

Wisconsin Avenue Parking Company, LLC

Wisconsin Avenue Parking Company, LLC (Wisconsin Avenue) is an investment in a parking company with NGLIC having 50% direct ownership. As of December 31, 2025, the audited financial statements of Wisconsin Avenue reported assets of $6.0 million, liabilities of $135.8 thousand, and equity of $5.9 million. Operations for 2025 produced a net loss of $49.0 thousand.

NGL Bristol RE LLC

NGL Bristol RE LLC (NGL Bristol) was formed to hold a prior investment in the Palisade Building in advance for a potential sale. NCLIC has a 50% interest in the property. As of

December 31, 2025, the audited financial statements of NGL Bristol reported assets of $3.2 million, liabilities of $0, and equity of $3.2 million. Operations for 2025 produced a net loss of $382.4 thousand.

RRNGL, LLC

RRNGL, LLC (RRNGL) is an investment in an apartment complex with NGLIC having 50% interest in the property. RRNGL is domiciled in Iowa. As of December 31, 2025, the audited financial statements of RRNGL reported assets of $95.0 million, liabilities of $89.6 million, and equity of $5.4 million. Operations for 2025 produced a net loss of $3.8 million.

NGL Holdings, Inc

NGL-H is a holding company for NGL Financial Services, Inc (NGL-FS), NGL Investment Services, Inc (NGL-IS) and Beyondly, Inc (Beyondly). The entity is considered nonadmitted. As of December 31, 2025, the unaudited financial statements of NGL-H reported assets of $1.3 million, liabilities of $1.1 million, and equity of $193.1 thousand. Operations for 2025 produced a net loss of $9.1 thousand.

NGL Financial Services, Inc

NGL-FS operated as a corporate general agency to market life and health insurance products for other insurance companies. NGL-FS has no current operations and is immaterial.

NGL Investment Services, Inc.

NGL-IS holds and operates select real estate properties and other investments. As of December 31, 2025, the unaudited financial statements of NGL-IS reported assets of $1.1 million, liabilities of $1.1 million, and equity of $15.7 thousand. Operations for 2025 produced a net loss of $3.5 thousand.

Beyondly, Inc

Beyondly provided a technology platform for permanent and accessible storage of an individual’s important information through Everplans. Beyondly is domiciled in New York. Beyondly’s assets and technology platform were sold to an unrelated third-party in 2024. Beyondly’s operations are immaterial.

Agreements with Affiliates

NGL Insurance Company has several master service agreements, an administrative agreement, and a marketing agreement in place with various affiliates. A brief description of each agreement follows.

1. Type: Management Services Agreement
   Parties: NGL MHC, NGLC, NGLIC
   Scope: Each party may receive or provide services to one another. Service recipient will be charged with its allocable share at actual costs incurred.
   Effective date: January 1, 2026

2. Type: Management Service Agreement
   Parties: PCBG, NGLIC
   Scope: Each party may receive or provide services to one another. Service recipient will be charged with its allocable share at actual costs incurred.
   Effective date: April 29, 2022

3. Type: Marketing Agreement
   Parties: PCBG, NGLIC
   Scope: PCBG shall perform marketing duties related to certain dental and vision products.
   Effective date: July 1, 2023

4. Type: Administration Agreement
   Parties: PCA, NGLIC
   Scope: PCA shall perform administrative duties related to dental and vision policies sold under the Marketing Agreement with PCBG. Service recipient will be charged with its allocable share at actual costs incurred.
   Effective date: July 1, 2023

5. Type: Management Services Agreement
   Parties: PCB, PCBG, PCA, MMG, NDB, NGLIC
   Scope: Each party may receive or provide services to one another. Service recipient will be charged with its allocable share at actual costs incurred.

	Effective date:	April 18, 2022
6.	Type:	Management Services Agreement
	Parties:	Beyondly, NGLIC
	Scope:	Each party may receive or provide services to one another. Service recipient will be charged with its allocable share at actual costs incurred.
	Effective date:	October 6, 2023

V. REINSURANCE

The company's reinsurance portfolio and strategy at the time of the examination are described below. A list of the companies that have a significant amount of reinsurance in force at the time of the examination follows. The contracts contained proper insolvency provisions.

Assuming Contracts

At times, the company has opportunistically assumed blocks of closed whole life and fixed annuity policies. Significant blocks of assumed business include: Trustmark Insurance Company (Trustmark block), Citizen Security Life Insurance Company (CSL block), Lincoln Heritage Life Insurance Company (LHL block), Madison National Life Insurance Company (MNL block), and Columbian Mutual Life Insurance Company (CML block). Many of these blocks assumed are subsequently retroceded, and recently, the company has worked to novate certain blocks assumed or otherwise closed legacy business to Security Benefit Life Insurance Company.

Ceding Contracts

On all direct written legacy life business, the company utilizes reinsurance to maintain a maximum net retention on any life of $400,000 for individual life and $200,000 for group life coverage on legacy business. The company has traditionally utilized facultative reinsurance coverage when it wishes to insure a risk greater than the company’s maximum retention. The company specifically used Swiss Re and Lincoln for traditional life, and Swiss Re, Lincoln, or Transamerica for Universal Life. There are very few facultative contracts remaining given the age of the legacy block. Additionally, the company does not have a maximum net retention on all newly written life sales as all business is either preneed or final expense, and the company retains all risk regardless of face amount.

The company’s other ceded reinsurance program is broken down by four business lines: legacy closed blocks, preneed, long-term care, and accident & health (A&H). First, relating to the legacy closed blocks in an effort to focus on its core business, NGLIC has ceded certain legacy closed blocks of life, annuity, and A&H business to Prosperity Assurance Limited, Security Benefit Life Insurance

Company, and Markel Bermuda Limited, each unaffiliated reinsurers. The former two agreements are coinsurance with funds withheld and the latter is coinsurance agreement.

Second, relating to the preneed business line, effective January 1, 2023, the company retains 100% of the risk on newly written preneed business. Between January 1, 2021, and December 31, 2022, the company had an active 80% cession on preneed business to Kuvare Life Re Limited (Kuvare), a nonaffiliated Bermuda based reinsurer, under a coinsurance with funds withheld arrangement. The reinsurance agreement was characterized as flow reinsurance that the company would utilize during the low-interest rate environment. The Kuvare agreement was cancelled effective December 31, 2022, however the preneed block ceded to Kuvare remains significant.

Third, relating to the long-term care business, the company cedes 50% of the risk on newly written business under a pro rata coinsurance arrangement with JALIC. The company originally ceded the business to LifeCare when the company first started writing long-term care in 2016. The LifeCare reinsurance arrangement started as a 100% pro rata coinsurance and was later amended to 50% in 2021. The company later agreed in 2022 to recapture the LifeCare block, terminate the LifeCare agreement, and concurrently ceded the block and newly written long-term care business to JALIC.

Fourth, relating to the A&H business lines, which include group dental & vision, individual dental & vision, group fixed indemnity, Medicare Supplement, and other minor A&H products, the company cedes nearly 100% of the risk via coinsurance and/or coinsurance with funds withheld arrangements with various unaffiliated reinsurers. The cessions vary from 70% - 100% depending on the agreement and product with most agreements and the most significant agreements at 100%. Typically, the company has administration and marketing agreements with certain TPAs that also assume the business written with an affiliate reinsurer of the TPA.

Affiliated Ceding Contracts

1.	Type:	Loss Portfolio Transfer/Quota Share
	Reinsurer:	Bright Reinsurance Limited
	Scope:	Business related to group dental and health business related to Bright Benefits Policies. Loss Portfolio Transfer of in-force policies and prospective Quota Share agreement.

	Cession:	100%
	Effective date:	October 1, 2022, through December 31, 2022, and shall renew for successive annual terms unless terminated.

Nonaffiliated Ceding Contracts

1.	Type:	Coinsurance with Funds Withheld
	Reinsurer:	Security Benefit Life Insurance Company
	Scope:	Ceding and or retrocession on certain CML and other legacy blocks.
	Cession:	100%
	Effective date:	December 31, 2021, and shall continue in force until all reinsured policies are terminated.
2.	Type:	Coinsurance
	Reinsurer:	Markel Bermuda Limited
	Scope:	Retrocession on certain MNL blocks.
	Cession:	80%
	Effective date:	April 1, 2009; assignment to NGL effective July 31, 2015
3.	Type:	Coinsurance with Funds Withheld
	Reinsurer:	Prosperity Assurance Limited
	Scope:	Ceding and or retrocession on certain CSL and other legacy blocks.
	Cession:	100%
	Effective date:	July 1, 2020, and shall continue in force until all reinsured policies are terminated.
4.	Type:	Coinsurance with Funds Withheld
	Reinsurer:	Kuvare Life Reinsurance Limited
	Scope:	Preneed business
	Cession:	80% of preneed policies written during the contract period.
	Effective date:	January 1, 2021, through December 31, 2022
5.	Type:	Other

	Reinsurer:	John Alden Life Insurance Company
	Scope:	Long Term Care business
	Cession:	100% before January 1, 2021, 50% after January 1, 2021
	Effective date:	April 1, 2022, applies to policies issued as of January 1, 2016, and continues in perpetuity until terminated.
6.	Type:	Other
	Reinsurer:	Loyal American Life Insurance Company
	Scope:	Individual Medicare Supplement policies sold through various distributors and administered through Secure Administrative Solutions.
	Cession:	80% before August 1, 2021, 85% after August 1, 2021
	Effective date:	November 15, 2017
7.	Type:	Quota Share
	Reinsurer:	Beam Reinsurance Company Limited
	Scope:	Individual/Group dental sold through Beam Insurance Services and administered through Beam Insurance Administrators.
	Cession:	100%
	Effective date:	April 1, 2016, through March 31, 2021, and shall automatically renew for successive annual periods unless terminated.
8.	Type:	Quota Share
	Reinsurer:	Fielmann Vision Insurance, Inc.
	Scope:	Group vision policies sold through Fielmann USA and administered through SVS Vision.
	Cession:	100%
	Effective date:	December 1, 2024, through December 31, 2026, and shall automatically renew for successive annual periods unless terminated.

Nonaffiliated Assuming Contracts

1.	Type:	Coinsurance
	Reinsured:	Trustmark Insurance Company

	Scope:	Trustmark block includes traditional life, universal life, related riders, and supplementary contracts with NGL Insurance Company responsible for administration.
	Retention:	100%
	Effective date:	June 30, 2002
2.	Type:	Coinsurance
	Reinsured:	Citizens Security Life Insurance Company
	Scope:	CSL block includes traditional life, universal life, industrial life, related riders, deferred annuities, disability income, preneed life, and supplementary contracts with NGL Insurance Company responsible for administration.
	Retention:	100%
	Effective date:	April 01, 2009
3.	Type:	Coinsurance
	Reinsured:	Lincoln Heritage Life Insurance Company
	Scope:	Lincoln block includes preneed life and annuity contracts with NGL Insurance Company responsible for administration.
	Retention:	100%
	Effective date:	January 01, 2011
4.	Type:	Coinsurance
	Reinsured:	Columbian Mutual Life Insurance Company
	Scope:	CML block includes traditional life, industrial life, related riders, deferred annuities, and supplementary contracts with EXL Service Holdings, Inc. performing policy administration.
	Retention:	25% after inuring reinsurance applied
	Effective date:	January 01, 2016

VI. FINANCIAL DATA

The following financial statements reflect the financial condition of the company as reported to the Commissioner of Insurance in the December 31, 2025, annual statement. Adjustments made as a result of the examination are noted at the end of this section in the area captioned "Reconciliation of Surplus per Examination." Also included in this section are schedules that reflect the growth of the company and the compulsory and security surplus calculation.

NGL Insurance Company
Assets
As of December 31, 2025

	Assets	Nonadmitted Assets	Net Admitted Assets
Bonds	$4,267,201,223	$	$4,267,201,223
Stocks:			
Preferred stocks	39,012,345		39,012,345
Common stocks	6,441,983	193,136	6,248,847
Mortgage loans on real estate:			
First liens	204,188,942		204,188,942
Real estate:			
Occupied by the company	22,534,127		22,534,127
Held for production of income	802,871		802,871
Cash, cash equivalents, and short-term investments	127,397,455		127,379,455
Contract loans	20,722,253		20,772,253
Derivatives	428,500		428,500
Other invested assets	313,883,972		313,883,972
Receivables for securities	277,595		277,595
Investment income due and accrued	54,624,468	63,655	54,560,813
Premiums and considerations:			
Uncollected premiums and agents' balances in the course of collection	1,001,421	351,391	650,030
Deferred premiums, agents' balances, and installments booked but deferred and not yet due	39,592,346		39,592,346
Reinsurance:			
Amounts recoverable from reinsurers	341,423		341,423
Current federal and foreign income tax recoverable and interest thereon	6,661,746		6,661,746
Net deferred tax asset	89,919,721	56,640,149	33,279,572
Guaranty funds receivable or on deposit	1,044,583		1,044,583
Electronic data processing equipment and software	13,288,814	12,822,405	466,409
Furniture and equipment, including health care delivery assets	865,268	865,268	
Receivables from parent, subsidiaries and affiliates	1,389,326	46,607	1,342,719
Health care and other amounts receivable	3,625,432	3,625,432	
Write-ins for other than invested assets:			
Cash Value of Officers Life Insurance	184,989,475		184,989,475
Admitted Disallowed IMR	17,748,412		17,748,412
Miscellaneous Receivable	334,322		334,322
Notes Receivable	14,691,628	14,691,628	
Prepaid Expenses	6,960,992	6,960,992	
Total Assets	$5,439,952,643	$96,260,663	$5,343,691,980

NGL Insurance Company
Liabilities, Surplus and Other Funds
As of December 31, 2025

Aggregate reserve for life contracts		$3,574,419,459
Aggregate reserve for accident and health contracts		22,688,286
Liability for deposit-type contracts		131,233,297
Contract claims:		
Life		15,784,157
Accident and health		286,955
Policyholders' dividends/refunds to members and coupons due and unpaid		1,557
Provision for policyholders' dividends, refunds to members, and coupons payable in the following calendar year:		
Apportioned for payment		526,000
Premiums and annuity considerations received in advance		1,030,926
Other amounts payable on reinsurance		77,104,075
Commissions to agents due or accrued		9,873,113
General expenses due or accrued		18,834,592
Taxes, licenses, and fees due or accrued, excluding federal income taxes		1,754,847
Unearned investment income		920,637
Amounts withheld or retained by reporting entity as agent or trustee		164,499
Amounts held for agents' account, including agents' credit balances		571,360
Remittances and items not allocated		4,414,060
Liability for benefits for employees and agents if not included above		4,511,742
Miscellaneous liabilities:		
Asset valuation reserve		67,126,897
Reinsurance in unauthorized and certified companies		58,121
Funds held under reinsurance treaties with unauthorized and certified reinsurers		719,447,407
Funds held under coinsurance		208,730,713
Derivatives		
Payable for securities		2,828,433
Write-ins for liabilities:		
Post Retirement Benefits other than Pension		6,755,858
Unclaimed Funds		4,371,959
Liability for Pension Benefits		3,161,533
Deferral of Gain by Affiliate		1,202,434
Interest on Outstanding Claims		746,596
Total Liabilities		4,878,560,513
Surplus notes	$ 37,700,000	
Write-ins for special surplus funds:		
Admitted Disallowed IMR	17,748,412	
Unassigned funds (surplus)	409,683,055	
Total Capital and Surplus		465,131,467

Total Liabilities, Capital and Surplus	$5,343,691,980

NGL Insurance Company
Summary of Operations
For the Year 2025

Premiums and annuity considerations for life and accident and health contracts		$702,257,207
Net investment income		247,254,644
Amortization of interest maintenance reserve		(1,656,707)
Commissions and expense allowances on reinsurance ceded		33,231,084
Write-ins for miscellaneous income:		
Miscellaneous Income		11,527,014
Amortization of Deferred Gain		3,833,542
Administration Fees		1,222,101
Total income items		997,668,885
Death benefits	$322,482,842	
Matured endowments	501,362	
Annuity benefits	37,952,123	
Disability benefits and benefits under accident and health contracts	1,137,988	
Surrender benefits and withdrawals for life contracts	11,219,520	
Interest and adjustments on contract or deposit-type contract funds	6,627,663	
Payments on supplementary contracts with life contingencies	(61,635)	
Increase in aggregate reserves for life and accident and health contracts	222,414,235	
Subtotal	602,274,098	
Commissions on premiums, annuity considerations, and deposit-type contract funds (direct business only)	192,938,307	
Commissions and expense allowances on reinsurance assumed	704,552	
General insurance expenses and fraternal expenses	97,712,089	
Insurance taxes, licenses, and fees excluding federal income taxes	19,152,459	
Increase in loading on deferred and uncollected premiums	5,485,103	
Write-in for deductions:		
Investment Income Adjustment – Reinsurance	56,828,178	
Miscellaneous Expense	1,177,694	
Amortization of Goodwill	161,621	
Interest on Funds Withheld	73,384	
Regulatory Fees and Penalties	60,477	
Total deductions		976,567,962
Net gain (loss) from operations before dividends to policyholders, refunds to members, and federal income taxes		21,100,923
Dividends to policyholders and refunds to members		464,889

Net gain (loss) from operations after dividends to policyholders, refunds to members, and before federal income taxes	20,636,034
Federal and foreign income taxes incurred (excluding tax on capital gains)	5,971,942
Net gain (loss) from operations after dividends to policyholders, refunds to members, and federal income taxes and before realized capital gains or (losses)	14,664,092
Net realized capital gains or (losses)	(5,706,435)
Net Income (Loss)	$ 8,957,657

NGL Insurance Company
Cash Flow
For the Year 2025

Premiums collected net of reinsurance			$692,035,839
Net investment income			247,684,641
Miscellaneous income			23,858,858
Total			963,579,338
Benefit- and loss-related payments		$383,295,494	
Commissions, expenses paid, and aggregate write-ins for deductions		363,690,042	
Dividends paid to policyholders		509,832	
Federal and foreign income taxes paid (recovered)		(247,995)	
Total deductions			747,247,373
Net cash from operations			216,331,965
Proceeds from investments sold, matured, or repaid:			
Bonds	$515,789,606		
Stocks	7,380,552		
Mortgage loans	21,273,777		
Other invested assets	40,264,313		
Total investment proceeds		584,708,248	
Cost of investments acquired (long-term only):			
Bonds	702,927,271		
Stocks	14,887,215		
Mortgage loans	43,037,880		
Real estate	256,118		
Other invested assets	10,253,216		
Total investments acquired		771,361,700	
Net increase (or decrease) in contract loans and premium notes		(986,320)	
Net cash from investments			(185,667,132)
Cash from financing and miscellaneous sources:			
Surplus notes, capital notes		(2,400,000)	
Net deposits on deposit-type contracts and other insurance liabilities		2,283,254	
Other cash provided (applied)		3,547,094	
Net cash from financing and miscellaneous sources			3,430,348
Reconciliation:			
Net Change in Cash, Cash Equivalents, and Short-Term Investments			34,095,181
Cash, cash equivalents, and short-term investments:			
Beginning of year			93,284,274
End of year			$127,379,455

NGL Insurance Company
Compulsory and Security Surplus Calculation
December 31, 2025

Assets			$5,343,691,980
Less security surplus of insurance subsidiaries			0
Less liabilities			4,878,560,513
Adjusted surplus			465,131,467
Annual premium:			
Individual life and health	$255,615,113		
Factor	15%		
Total		$38,342,267	
Group life and health	579,151,089		
Factor	10%		
Total		57,915,109	
Greater of 7.5% of considerations or 2% of reserves for annuities and deposit administration funds		3,758,562	
Compulsory surplus (subject to a $2,000,000 minimum)			100,015,938
Compulsory Surplus Excess (Deficit)			$ 365,115,529
Adjusted surplus (from above)			$ 465,131,467
Security surplus (140% of compulsory surplus, factor reduced 1% for each $33 million in premium written in excess of $10 million, with a minimum of 110%)			114,018,169
Security Surplus Excess (Deficit)			$ 351,113,298

NGL Insurance Company
Analysis of Surplus
For the Five-Year Period Ending December 31, 2025

The following schedule details items affecting the company's total capital and surplus during the period under examination as reported by the company in its filed annual statements:

	2025	2024	2023	2022	2021
Capital and surplus, beginning of year	$476,374,636	$493,649,053	$523,033,708	$495,092,386	$417,464,534
Net income	8,957,657	2,159,138	16,958,245	31,288,029	73,675,216
Change in net unrealized capital gains/losses	(3,425,550)	(11,714,923)	(13,443,688)	24,586,021	(49,782,419)
Change in net deferred income tax	6,481,810	10,148,909	10,559,815	7,274,206	(3,142,165)
Change in nonadmitted assets and related items	(11,720,812)	(14,603,924)	(20,204,954)	(12,186,965)	6,138,938
Change in liability for reinsurance in unauthorized and certified companies	(22,751)	(35,162)	71,780	265,707	(171,169)
Change in asset valuation reserve	(2,419,379)	(201,469)	(13,129,446)	(19,911,425)	(789,758)
Change in surplus notes	(2,400,000)	(2,400,000)	(5,025,000)	(2,400,000)	(2,400,000)
Change in surplus as a result of reinsurance	(3,833,542)	(5,895,180)	(5,214,388)	(4,278,162)	46,595,845
Write-ins for gains and (losses) in surplus:					
Prior Year Surplus Adjustment	0	6,472,530	0	0	0
Change in Liability for Pension Benefits	(301,657)	(535,584)	(420,357)	1,739,236	6,507,083
Change in Liability for Postretirement Benefits	(2,558,945)	(704,752)	463,338	1,564,675	1,005,281
Capital and Surplus, End of Year	$465,131,467	$476,374,636	$493,649,053	$523,033,708	$495,092,386

Growth of NGL Insurance Company

Year	Admitted Assets	Liabilities	Capital and Surplus
2025	$5,343,691,980	$4,878,560,513	$465,131,467
2024	5,129,324,936	4,652,950,300	476,374,636
2023	4,930,642,514	4,436,993,461	493,649,053
2022	4,798,036,467	4,275,002,759	523,033,708
2021	4,698,134,728	4,203,042,342	495,092,386
2020	4,419,306,354	4,001,841,820	417,464,534

Net Life Premiums, Annuity Considerations, and Deposits

Year	Life Insurance Premiums	Annuity Considerations	Deposit-type Contract Funds
2025	$637,801,350	$ 39,761,664	$ 251,880
2024	603,534,104	40,054,228	687,171
2023	511,346,417	32,262,929	1,331,055
2022	222,307,320	31,187,524	4,219,727
2021	122,455,777	(57,201,678)	45,709,386
2020	354,326,368	(170,546,819)	99,507,837

Life Insurance In Force (in thousands)

Year	In Force End of Year	Reinsurance Ceded	Net In Force
2025	$8,819,079	$1,735,139	$7,083,940
2024	8,481,521	1,846,963	6,634,558
2023	8,136,085	1,975,042	6,161,043
2022	7,892,300	2,564,912	5,327,388
2021	7,690,081	2,187,628	5,502,453
2020	7,493,086	1,298,603	6,194,483

Accident and Health

Year	Net Premiums Earned	Incurred Claims and Cost Containment Expenses*	Commissions Incurred	Other Expenses Incurred**	Combined Loss and Expense Ratio
2025	$14,073,117	$ 7,365,978	$(2,494,674)	$10,413,089	108.7%
2024	13,449,889	6,764,595	(1,813,099)	9,120,511	104.6
2023	12,701,003	6,117,249	(1,873,233)	8,521,296	100.5
2022	12,017,754	5,189,944	(4,761,050)	9,963,089	86.5
2021	9,623,375	2,854,098	(4,679,035)	12,428,711	110.2
2020	31,339,294	17,320,745	(7,061,909)	14,814,950	80.0

* Includes increase in contract reserves
** Includes taxes, licenses, and fees

NGL has experienced steady growth in admitted assets and premiums over the examination period. During the period under examination, the company's surplus increased 11.4% from $417 million to $465 million, life insurance premiums have increased 80.0% from $354 million to $638 million, and total admitted assets have increased 20.9% from $4,419 million to $5,344 million. Net income has been positive each year during the examination period. The relative decline in net income and surplus over the past three years can be attributed to, first, the capital deployment for the future benefit of the preneed

business through the development of a new policy administration system and, second, the surplus strain of new business from the growth in sales.

NGL ceded certain closed blocks of life, annuity, and accident and health business to Prosperity Life Assurance Limited, a nonaffiliated Bermuda based reinsurer, during 2020. It caused annuity considerations to be negative during 2020. For A&H, the negative commissions incurred are due to carrier/fronting fees that NGL receives on A&H business where NGL is the direct writer.

Reconciliation of Surplus per Examination

No adjustments were made to surplus as a result of the examination. The amount of surplus reported by the company as of December 31, 2025, is accepted.

Examination Reclassifications

No reclassifications were made as a result of the examination.

VII. SUMMARY OF EXAMINATION RESULTS

Compliance with Prior Examination Report Recommendations

There was one specific comment and recommendation in the previous examination report.

The action taken by the company as a result of the comment and recommendation was as follows:

1. Managing General Agents—It is once again recommended that the company provide a written notification to the commissioner within 30 days of entering into or terminating a contract with a managing general agent in accordance with s. Ins 42.05 (5), Wis. Adm. Code.

   Action—Compliance.

Summary of Current Examination Results

This section contains comments and elaboration on those areas where adverse findings were noted or where unusual situations existed. Comment on the remaining areas of the company's operations is contained in the examination work papers.

Management Comment Letter

A finding was provided to the company in the form of a Management Comment Letter dated October 12, 2026. It is recommended that the company comply with the finding delineated in the Management Comment Letter.

Reinsurance Reporting

The examination team reviewed the reporting of the company's reinsurance agreements. It was found the company incorrectly reported a reinsurer and the status of a reinsurer in its annual statutory statement filings, specifically an incorrect unauthorized reinsurer was listed as authorized on Schedule S – Part 3 – Section 2. It is recommended that the company comply with the NAIC *Annual Statement Instructions* by correctly reporting its reinsurers and the status of its reinsurers.

VIII. CONCLUSION

NGL Insurance Company is a Wisconsin-domiciled life insurance company that commenced business in 1910. The company underwent a corporate reorganization and formed a mutual holding company, effective January 1, 2026. The company is the predominant entity within the group and contains substantially all insurance operations. The company is licensed to write in 50 states except for New York, and the major products marketed by the company are preneed, employee benefits, and long-term care.

During the period under examination, the company's surplus increased 11.4% from $417 million to $465 million, life insurance premiums have increased 80.0% from $354 million to $638 million, and total admitted assets have increased 20.9% from $4,419 million to $5,344 million. The company has experienced steady growth in assets and premiums over the examination period. The relative decline in net income and surplus over the past three years can be attributed to, first, the capital deployment for the future benefit of the preneed business through the development of a new policy administration system and, second, the surplus strain of new business from the growth in sales.

The current examination resulted in two recommendations. One recommendation is in the form of a Management Comment Letter, and the other recommendation is related to reinsurance reporting in accordance with the NAI*C Annual Statement Instructions.* No adjustments were made to the company's reported surplus. The amount of surplus reported by the company as of December 31, 2025, is accepted.

IX. SUMMARY OF COMMENTS AND RECOMMENDATIONS

1. Page 33 - Management Comment Letter— It is recommended that the company comply with the finding delineated in the Management Comment Letter.

2. Page 33 - Reinsurance Reporting— It is recommended that the company comply with the NAIC *Annual Statement Instructions* by correctly reporting its reinsurers and the status of its reinsurers.

X. ACKNOWLEDGMENT

The courtesy and cooperation extended during the course of the examination by the officers and employees of the company are acknowledged.

In addition to the undersigned, the following representatives of the Office of the Commissioner of Insurance, State of Wisconsin, participated in the examination:

Name	Title
Thomas Hilger, CFE	Insurance Financial Examiner
Samir Hossain	Insurance Financial Examiner
Robert Monroe	Insurance Financial Examiner
Henry Niedbalski	Insurance Financial Examiner
Eleanor Lu, CISA, AES	IT Specialist
Nicholas Hartwig, CFE	Quality Control Specialist
Levi Olson, CFE	Reserve Specialist

Respectfully submitted,



Jeremy Tang, AFE
Examiner-in-Charge

XI. SUBSEQUENT EVENTS

Mutual Holding Company Structure and Reorganization

Effective January 1, 2026, the company reorganized into a mutual holding company group system with NGLIC converting to a stock insurer. As part of the conversion, National Guardian Life Insurance Company changed its name to NGL Insurance Company. NGL Mutual Holding Company (NGL MHC) is the entity by which members of the converted NGL Insurance Company and the policyholders of any future insurance subsidiaries of NGL MHC shall hold their membership interests, including the right to elect the board of directors. NGL Corp, Inc. was established as a wholly owned subsidiary of NGL MHC with the intent to hold the NGL Insurance Company and all other affiliates. As part of the mutual holding company restructuring, effective April 1, 2026, NGL Insurance Company transferred its ownership of NGL Holdings, Inc. to NGL Corp, Inc.