

## Exhibit I

### **Competitive Impact Statement<sup>1</sup>**

The Applicant's proposed acquisition of control of the Domestic Insurer will not create a monopoly or substantially lessen competition in insurance in the State of Wisconsin. The relevant market is "direct written insurance premium in this state for a line of business as contained in the annual statement" required to be filed by insurers licensed to do business in Wisconsin. *See* Wis. Admin. Code § 40.025(2)(d). The Domestic Insurer only reports direct written premiums in Wisconsin in the vision line of business of the health annual statement, and no other insurance company subsidiary of Versant Health reports any direct written premiums for any line of business in Wisconsin. Accordingly, this analysis only considers the U.S. insurance subsidiaries of the Applicant that are required to file health annual statements in Wisconsin (collectively, the "MetLife Insurers"). The chart below sets forth the respective and combined 2019 market share percentages of the Domestic Insurer and the MetLife Insurers with respect to the only relevant market in this analysis, the vision line of insurance. Such market share percentages are based on direct written premiums reported by S&P Global Market Intelligence (formerly SNL Financial) as of year-end 2019.

<b>Line of Business</b>	<b>Market Share of the Domestic Insurer</b>	<b>Total Market Share of MetLife Insurers</b>	<b>Combined Total</b>
Vision	21.85%	0%	21.85%

Based on the information set forth above, the Proposed Transaction meets the pre-acquisition notification exemption standard set forth in Wis. Admin. Code § 40.025(2)(d)(2) because there is no increase in market share. Accordingly, the Applicant respectfully requests that the OCI deem the information provided in this Exhibit I to satisfy the requirements of Wis. Admin. Code § 40.02(1)(b)(1).

---

<sup>1</sup> Defined terms used in this Exhibit I and not defined herein shall have the meanings ascribed to it in the Statement to which this Exhibit I is attached.