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September 26, 2025

VIA OCI PORTAL

The Honorable Nathan Houdek
Commissioner of Insurance
Wisconsin Office of the
Commissioner of Insurance
125 S. Webster Street
Madison, Wisconsin 53703

Attn: Chris Martin, Division of Financial Regulation

RE: Confidential Supplement to the Form A Statement Regarding the Proposed Acquisition of Homestead Mutual Insurance Company

Dear Commissioner Houdek:

Today, we submitted a Form A Statement Regarding the Acquisition of Control of a Domestic Insurer (the "Form A Statement") in connection with the proposed acquisition of control of Homestead Mutual Insurance Company (the "Domestic Insurer"), on behalf of Mutual of Wausau Insurance Corporation ("MWIC" and the "Applicant"). This letter and the enclosures herewith constitute a confidential supplement to the Form A Statement (the "Confidential Supplement").

Specifically, we are requesting confidential treatment for the following documents:

- Confidential Exhibit 1: Three-Year Financial Projections for the Domestic Insurer (including Compulsory and Security Surplus Calculation)
- Confidential Exhibit 2: Plan of Operations
- Confidential Exhibit 3: Biographical Affidavits for the Directors and Executive Officers of the Applicants and proposed Directors and Executive Officers of the Domestic Insurer

This Confidential Supplement, together with any items that may be submitted separately as amendments or supplements hereto, contains (i) private personal information and (ii) confidential and/or proprietary information, business plans and strategies that are trade secrets and are not otherwise available to the public and that, if disclosed, could cause substantial injury to the competitive position of the Applicant. Pursuant to Wis. Admin. Code § INS 40.05, such information is required pursuant to Wis. Stat. § 601.42; therefore, the Commissioner may withhold

this information from public disclosure pursuant to Wis. Stat. § 601.465(1m)(a) and Wis. Admin. Code § Ins 6.13(2). Moreover, because the information is not public, it is presumed under Wis. Stat. § 601.465(1n)(a), notwithstanding Wisconsin public records law (Wis. Stat. §§ 19.31-.39), that the information is proprietary and confidential and that the potential for harm and competitive disadvantage if it is made public by the Commissioner outweighs the public interest in the disclosure of the information.

Accordingly, the Applicants respectfully requests that Confidential Exhibit 1 through Confidential Exhibit 3 (and any exhibits or attachments thereto), be afforded confidential treatment and be excepted from disclosure pursuant to all applicable provisions of law, including as specified below. All such information is provided with the express understanding that the confidentiality of such information will be safeguarded.

Specifically, Confidential Exhibit 1 and Confidential Exhibit 2 include "trade secrets" as defined under Wis. Stat. § 134.90(1)(c) because information in these exhibits "derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use [and] is the subject of efforts to maintain its secrecy that are reasonable under the circumstances." Trade secrets are exempt from disclosure under the public records law under Wis. Stat. § 19.36(5) and Wis. Admin. Code § INS 6.13(2). Accordingly, the Applicants respectfully request that the Commissioner afford Confidential Exhibit 1 and Confidential Exhibit 2 confidential treatment and except them from disclosure pursuant to this authority.

The NAIC biographical affidavits provided as Confidential Exhibit 3 include information that is not otherwise available to the public, is subject to financial privacy and individual privacy protections, and is presumed confidential and should be afforded confidential treatment pursuant to Wis. Stat. § 601.465(1m)(d). The public value of this personal information is outweighed by the privacy interests of persons submitting these affidavits and by the public interest in encouraging qualified people to serve in these capacities, see the Wisconsin Attorney General's March 2018 Wisconsin Public Records Law Compliance Guide, pp. 36-39, and, in particular, home information and the social security number of an employee provided by an employer are exempt from the public records law. Id. at p. 23, citing Wis. Stat. § 19.36(10)(a). Therefore, Confidential Exhibit 3 will be provided with the understanding that the confidentiality of such information contained therein will be safeguarded and such individuals submitting NAIC biographical affidavits will be protected from unwarranted invasions of personal privacy pursuant to all provisions of law including, but not limited to, the referenced authority and any other applicable statutory or regulatory authority available to the Commissioner.

The Applicants also request that it be notified in advance of any requesting party seeking to rebut the presumption of confidentiality for nonpublic documents and information in this Confidential Supplement under Wis. Stat. § 601.465(1n)(b), or any proposed disclosure of any portion of this Form A designated as confidential, so that it has a reasonable opportunity to seek a protective order or take any other action to prevent or limit such disclosure. .

Thank you for your assistance on this matter. Should you have any questions or require any further information, please do not hesitate to contact either of us, Zach Bemis at (608) 284-2224 or by e-mail at zbemis@gklaw.com, or Isabella Jarosz at (414) 287-9311 or by e-mail at ijarosz@gklaw.com.

Sincerely,

GODFREY & KAHN, S.C.

Zachary P. Bemis

Isabella C. Jarosz

Enclosures

cc: Todd Lentz, MWIC