

ASSUMPTION REINSURANCE TRANSACTION FREQUENTLY ASKED QUESTIONS

INTRODUCTION

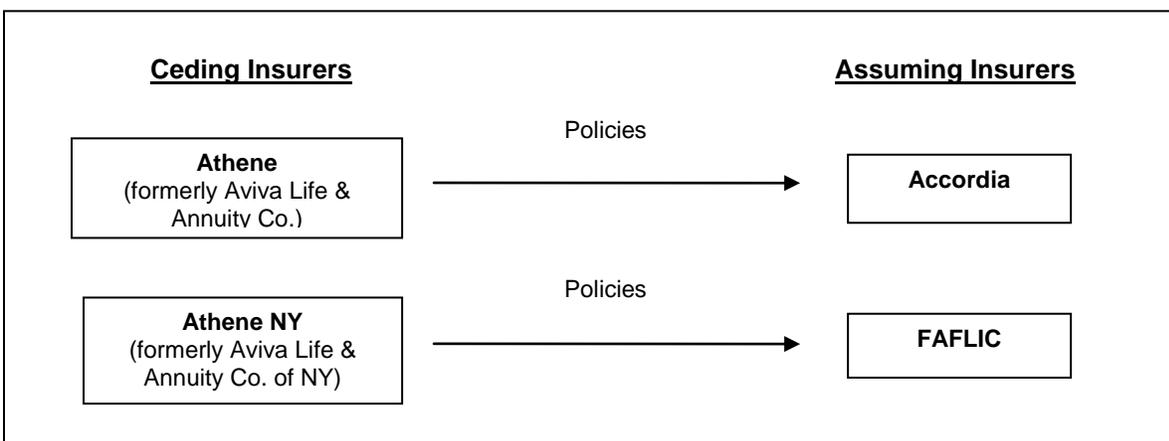
This transaction involves four insurers:

- Athene Annuity and Life Company (“**Athene**”)
- Athene Life Insurance Company of New York (“**Athene NY**”)

- Accordia Life and Annuity Company (“**Accordia**”)
- First Allmerica Financial Life Insurance Company (“**FAFLIC**”).

Athene was formerly known as Aviva Life and Annuity Company, and Athene NY was formerly known as Aviva Life and Annuity Company of New York. Because their names were recently changed, callers may still know them as Aviva.

Accordia and FAFLIC have purchased the life insurance business of Athene and Athene NY. To complete the purchase, Accordia has agreed to replace Athene as the insurer for life insurance policies originally issued by Athene, and FAFLIC has agreed to replace Athene NY for life insurance policies originally issued by Athene NY. This is done by transferring the policies from the ceding insurer to the assuming insurer as illustrated below. Once a transfer is complete, the assuming insurer takes over all responsibilities for the policy as if Accordia or FAFLIC had originally issued the policy.



Before a policy can be transferred, the policyholder must be notified of the proposed transfer and either explicitly or implicitly consent, depending on the applicable state requirements. Policyholders have been sent a Notice of Transfer informing them of the proposed transfer and asking for their consent. The Notices of Transfer include a pre-addressed postage-paid response card that policyholders can use to either accept or reject the transfer. If a policyholder does not consent to the transfer, the policy will remain in force with Athene or Athene NY.

In most states, the policyholder may implicitly consent simply by not rejecting the transfer within a certain period of time following notice. In these states, a policyholder who wants to accept the transfer does not have to return the response card or do anything at all. The Notice of Transfer states how long the policyholder has to reject the transfer before implicit consent will be deemed to have been given. The policyholder can also explicitly consent by checking “I accept” on the response card and returning it, or by writing to the address provided in the Notice of Transfer.

In some states payment of premium following notice is considered to be implicit consent if the policyholder does not reserve the right to reject the transfer first. In these states, the Notice of Transfer describes how to pay premium while reserving the right to reject the transfer at a later date. If the policyholder receives a written premium statement, the statement also will have instructions..

Finally, a few states require that the policyholder affirmatively consent to the transfer in writing before the policy may be transferred.

The policyholder notification and consent requirements are governed by state law. **The applicable notice and consent requirements for each policyholder are determined by the law of the state where the policy was originally issued, unless the policyholder currently resides in the state of Washington. If a policyholder currently resides in Washington, the laws of Washington apply, even if the policy was originally issued in a different state.** For example, if a policy was issued in Missouri but the policyholder now resides in the state of Washington, the applicable laws are those of Washington State. Alternatively, if a policy was issued in Missouri but the policyholder has since moved to Ohio, the applicable laws are those of Missouri.

It is critical for you to confirm the following information at the start of each call:

- Which insurer (company) issued the policy?
- What is the policy number?
- In which state does the policyholder currently reside?

If the policyholder resides in Washington State, its laws apply. If the policyholder does not reside in Washington State, use the policy number to determine in which state the policy was originally issued. The laws of that state apply.

State-specific information concerning notice and consent is provided below.

FREQUENTLY ASKED QUESTIONS

What is This About?

Q1: Why did I receive a Notice of Transfer?

A1: You received the Notice of Transfer because Athene made a business decision to sell its life insurance business to [Accordia or FAFLIC], which are A-rated, financially strong insurance companies.

Q2: Is Athene in financial distress?

A2: No.

Q3: Do I have to accept the transfer of my policy?

A3: No. You can accept or reject the transfer by following the instructions in the Notice of Transfer. (See below for state-specific instructions).

Accepting or Rejecting the Transfer—In General

Q4: How do I accept or reject the transfer of my policy?

A4: Follow the instructions in the Notice of Transfer. (See below for state-specific instructions).

Q5: Can I reject the transfer now, over the phone?

A5: No. To reject the transfer, you need to follow the instructions in the Notice of Transfer you received.

Will Anything Change?

Q6: Will my insurer change?

A6: Only if you accept the transfer of your policy as described in the Notice of Transfer you received.

Q7: Will the benefits or features of my policy change?

A7: No. All the benefits and features of your policy will remain the same regardless of whether the you accept or reject the transfer.

- Q8: Will the beneficiaries or any powers of attorney change?
A8: No. The beneficiaries and any powers of attorney will remain the same regardless of whether you accept or reject the transfer.
- Q9: Will my premium payments change?
A9: No. Your billed premium will remain the same regardless of whether you accept or reject the transfer.
- Q10: Will I need to make premium payments on a different day of the month?
A10: No. The due date of your premiums will remain the same regardless of whether you accept or reject the transfer.
- Q11: Will I make premium payments the same way?
A11: Yes. If there is any change in the process for making payments in the future, we will send you advance written notice.
- Q12: My policy's premium is currently on bank draft, will that info transfer over to new company?
A12: Yes, no changes are needed to continue your existing bank drafts.
- Q13: Will I receive a new policy?
A13: No, but if you accept the transfer, you will receive a Certificate of Assumption to document the transfer. Add this document to your original policy.
- Q14: If my policy is transferred, can I keep my old policy number?
A14: In most cases, yes. In a few cases, we will need to change the policy number for administrative reasons. We will send you written notice of any change.

Privacy

- Q15: Will my personal information remain confidential?
A15: Yes. If your policy is transferred, your information will be protected under the privacy policies of [Accordia or FAFLIC]. You will receive a privacy notice from your new insurer when the policy is transferred.

Lapsed Policies

- Q16: My policy has lapsed, why did I receive a Notice of Transfer?
A16: The notice was sent before or during the process of lapsing your policy. If your policy has lapsed, you might be able to reinstate it. If you are interested in discussing the reinstatement of your policy, I can transfer you to someone who can assist you.. [Provide instructions for transfer.]

Accepting or Rejecting the Transfer—State-Specific Information

- Q17: I received a Notice of Transfer. How do I accept or reject the transfer of my policy?
A17:

If the policy was issued in one of the following states:

Alabama	Alaska	Arizona	Arkansas	California	Connecticut	Delaware
District of Columbia	Florida	Hawaii	Idaho		Indiana	Iowa
Kentucky	Louisiana	Maryland	Massachusetts	Mississippi	Montana	Nevada
New Hampshire	New Jersey	New Mexico	North Dakota	Ohio	Oklahoma	Pennsylvania
	South	South Dakota	Tennessee	Texas	Utah	Virginia

Carolina

West Virginia Wyoming

- If you would like to accept the transfer, no action is required.
- If not, you need to check “I reject” on the response card included with the notice and send it back within 120 days from the date printed at the top of the notice.

If the policy was issued in **Colorado, Georgia, Kansas, Maine, Missouri, Nebraska, North Carolina, Oregon, Vermont** or **Rhode Island**:

- If you want to accept the transfer, no action is required. You may receive one or more follow-up Notices of Transfer giving you additional time to respond. Even if you receive a follow-up notice, no action is required if you would like to accept the transfer.
- Please be aware that if you make a premium payment 60 days or more after receiving the first notice without reserving your right to reject the transfer, the payment will be considered acceptance of the transfer. To reserve your right to reject the transfer, check “I reserve the right to reject” on the response card and return it to us. If you receive premium statements, the statement also will have instructions for reserving your right to reject the transfer.
- Note that reserving your right to reject the transfer is NOT the same as rejecting the transfer. If, after reserving your right to reject the transfer, you decide that you do wish to reject the transfer, you **MUST** follow the procedure outlined in the notice, keeping in mind the deadline for response stated in the notice.
- If you want to reject the transfer, you must check “I reject” on the response card and send it back within the time period stated on the notice. You also can write to us to tell us you reject within the time period stated on the notice. The address for writing to us is stated in the notice.

If the policy was issued in **Illinois** or **New York**:

- We do not have finalized details on how the Assumption process will be handled in New York or Illinois. As details are finalized, we will send an additional communication addressing those states.

If the policy was issued in **Michigan, Minnesota, Washington State** or **Wisconsin** or the policyholder resides in Washington State:

- If you would like to have your policy transferred, please check “I accept” on the response card included with the notice and return it to us. If you do not return the response card or write to your insurer at the address printed on the notice, your policy will not be transferred.