

## **ANNUAL TRUST REPORTING**

### **Agreed-Upon Procedures:**

The Trustee caused to occur certain agreed-upon procedures performed by a firm of independent certified public accountants. The purpose of the agreed-upon procedures is to ensure that the significant business processes relating to the Servicing of the Trust's insurance policies are functioning and being performed as represented by the Servicer for the period from October 1, 2020 through and including December 31, 2021.

The general scope of the agreed-upon procedures included a random sample of policies selected by the independent certified public accountants with a focus on the following areas: 1) billing and collection of premiums, 2) policy disposition and bidding process, 3) premium payments, and 4) death benefits.

The agreed-upon procedures report prepared by the independent certified public accounting firm reflects no significant findings relative to the testing performed except as follows:

- The Servicer was requested to provide but did not provide certification of the Servicer's non-affiliation with purchasers of policy interests in the format requested.

The results of the agreed-upon procedures report were reviewed by the Trustee. The Trustee is evaluating the impact and remediation necessary, if any, these findings may have on the Servicer's performance of its duties under the Servicing Agreement and may supplement with additional procedures and reporting.

# ANNUAL TRUST REPORTING

(Continued)

## **Internal Control Examination:**

The Trustee called for an examination of internal control procedures at the Servicer to be performed by a firm of independent certified public accountants. The examination procedures encompassed all significant procedures deemed necessary by the independent certified public accountants in order to address those control processes which in their opinion directly affects their role as the Trust's Servicer.

The results of the comprehensive examination were that the Trust and the Servicer maintained, in all material respects, effective internal control over financial reporting as they relate to the processing and servicing of the insurance policies under the responsibility of the Trust as of December 31, 2021. The report of the independent certified public accounting firm recommends that the Trust retain consultants to evaluate non-accounting controls. The accounting firm report further reflects that the Servicer was requested to provide but did not provide certification of the Servicer's non-affiliation with purchasers of policy interests in the format requested. The Trustee is evaluating the recommendation and what impact, if any, the exception item may have on the servicing of Keep Policies.