EXHIBIT A

STATE OF TENNESSEE

DEPARTMENT OF COMMERCE AND INSURANCE

REPORT ON EXAMINATION

OF

STEADPOINT INSURANCE COMPANY
BIRMINGHAM, ALABAMA

AS OF

DECEMBER 31, 2024

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Birmingham, Alabama
May 19, 2026

Honorable Carter Lawrence
Commissioner
Tennessee Department of Commerce and Insurance,
500 James Robertson Parkway
Nashville, Tennessee 37243

Dear Commissioner:

In accordance with your instructions and pursuant to Tennessee Code Annotated ("Tenn. Code Ann.") § 56-1-408, a full-scope financial examination and market conduct review, as of December 31, 2024, has been made of the condition and affairs of:

STEADPOINT INSURANCE COMPANY
NAIC # 10156
17 20th Street North, Suite 600
Birmingham, Alabama 35203

hereinafter referred to as the "Company" or "SteadPoint" and a report thereon is submitted as follows:

INTRODUCTION

This examination was arranged by the Tennessee Department of Commerce and Insurance (TDCI or "Department"). The examination was conducted by duly authorized representatives of the Department. This examination was called through the National Association of Insurance Commissioners (NAIC) Financial Examination Electronic Tracking System (FEETS). The Company did not have any affiliated insurers. Therefore, the examination did not qualify for coordination pursuant to NAIC guidelines.

SCOPE OF EXAMINATION

The last examination of the Company was made as of December 31, 2019. This examination covers the period January 1, 2020, through December 31, 2024, and includes any material transactions and/or events occurring subsequent to the examination date which were noted during the course of the examination.

The examination was conducted in accordance with rules and procedures as prescribed by the statutes of the state of Tennessee, and in accordance with practices and procedures promulgated by the NAIC *Financial Condition Examiners Handbook* ("Handbook"), as deemed appropriate. The examination was planned and performed to evaluate the financial condition of the Company as of December 31, 2024. The examination sought to identify prospective risks by obtaining information about the Company, including its corporate governance, by identifying and assessing inherent risks within the Company, and by evaluating system controls and procedures used to mitigate those risks. The examination also included assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation and management's compliance with statutory accounting principles and annual statement instructions.

All significant risks were considered when planning which key activities and accounts would be examined. The key activities included: Investments/Cash, Reinsurance Assumed, Reinsurance Ceded, Underwriting/Premiums/Pricing, Reserves/Claims Handling, Related Parties, and Capital and Surplus.

The Company's 2024 annual statement was compared with or reconciled to the corresponding general ledger account balances.

Independent information technology specialist services, provided by Examination Resources, LLC, were utilized in the examination review of the Company's information technology general controls (ITGC).

Actuaries with the firm Examination Resources, LLC, were utilized in the examination review of the Company's loss and claims reserves, as well as the risk assessment and review of controls for Reserving and Pricing key activities.

The Company's Certified Public Accountant (CPA) workpapers were reviewed for the 2024 audit and copies were incorporated into the examination, as deemed appropriate.

A separate market conduct review was performed concurrently with the financial examination. See the "Market Conduct Activities" section of this report.

COMPLIANCE WITH PREVIOUS EXAMINATION FINDINGS

No comments or recommendations were made during the previous examination.

COMPANY HISTORY

The Company is a stock property and casualty insurer incorporated on October 7, 2004. On May 9, 2005, the Company commenced business as Sheffield Insurance Company under a Certificate of Authority issued by the TDCI.

The Company's Charter was amended by the Board of Directors (Board) on June 29, 2012, and filed with the Tennessee Secretary of State on July 10, 2012, in order to effectuate the Company's name change to "SteadPoint Insurance Company" from "Sheffield Insurance Company."

As of December 31, 2024, the Company had common stock of six hundred thousand (600,000) shares of Class A voting shares with a par value of $2 per share, issued and outstanding and one hundred eleven (111) Class B non-voting shares with $2 par value. Sixty-six (66) of the Class B shares were issued and outstanding and forty-five (45) held as treasury stock.

MANAGEMENT AND CONTROL

MANAGEMENT

Directors

The Bylaws provide that the Board shall exercise all corporate powers and manage the business and affairs of the Company. The Board shall consist of no fewer than two (2) members. Board members are elected by the shareholders.

The following persons were duly elected by the shareholders and were serving as members of the Board, as of December 31, 2024:

Name	Principal Occupation
Charles Everett Bryan III	President/CEO
Donovan H. Gravlee	Business Owner
Jonathon Bly Gravlee	Business Owner

Officers

As of December 31, 2024, the Company has six (6) officer positions. The officers are appointed annually at the first meeting of the Board following the annual meeting of the shareholders or as soon thereafter as is conveniently possible.

The following persons were duly appointed by the Board and were serving as officers of the Company, as of December 31, 2024:

Name	**Title**
Charles Everett Bryan III	President, Chief Executive Officer, Treasurer
Donovan H. Gravlee	Vice President / Chairman of the Board
Jonathon Bly Gravlee	Secretary

Committees

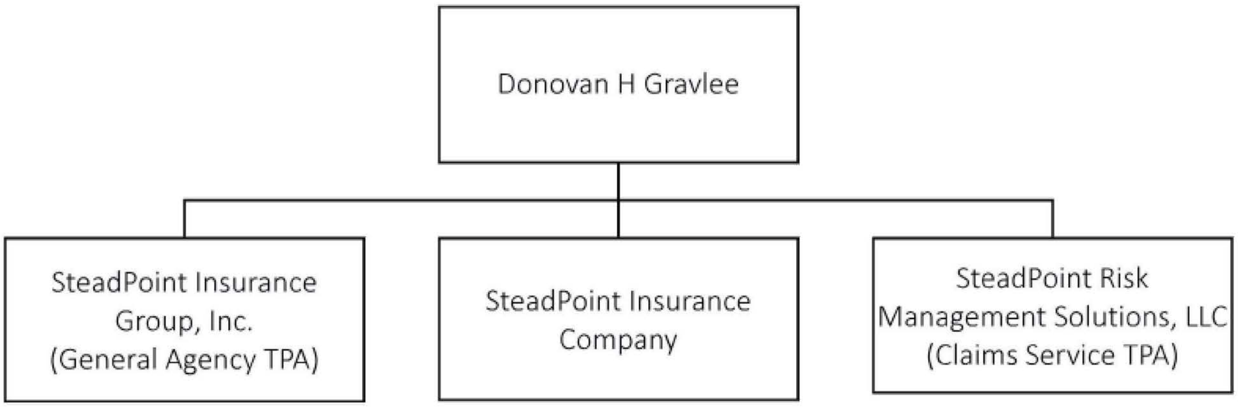
The Company's Board delegated certain duties and responsibilities to the audit committee and to the enterprise risk management committee.

CONTROL

The "Vickie Sue Cummings Gravlee 2012 Irrevocable Trust" owns one hundred percent (100%) of the issued and outstanding Class A voting common stock. However, Donovan H. Gravlee is recognized as the ultimate controlling person of the Company. As a result of a previously executed irrevocable proxy, he retains the right to vote all the shares of the Company's Class A voting shares of common stock.

ORGANIZATIONAL CHART

The following organizational chart shows the members of the holding company group as listed within the Company's 2024 Annual Statement:



DIVIDENDS

The Company’s only dividend during the examination period was declared by the Board on October 8, 2024. The declaration was an ordinary stock dividend consisting of 100,000 shares of Class A voting common capital stock at $2 par value per share ($200,000.00) and 11 shares of Class B non-voting common capital stock at $2 par value per share ($22.00), for a total combined value of $200,022. The stock certificates were issued to the Company's sole shareholder, the Vickie Sue Cummings Gravlee 2012 Irrevocable Trust. The dividend was reported to the Department within five (5) business days following the declaration of the Board and at least ten (10) days prior to the payment in compliance with Tenn. Code Ann. § 56-11-105(e).

CORPORATE RECORDS

The minutes of meetings of the Company’s shareholders, Board and Committees were reviewed for the period under examination. The minutes were complete as to necessary detail and appear to adequately reflect the acts of the respective bodies. The review of the minutes indicates that all investment transactions were approved by the Board pursuant to Tenn. Code Ann. § 56-3-408(b)(1).

Charter

The original Charter of the Company was filed with the Tennessee Secretary of State on October 7, 2004. The Charter states the Corporation is for-profit, organized to conduct business as a casualty insurance company under the laws of the state of Tennessee. The Charter was amended in 2007, 2008, and 2012. In December 2021, the Company filed an Amended and Restated Charter with the Tennessee Secretary of State to change its principal place of business and home administrative addresses which was approved.

Bylaws

The Bylaws provide for an annual shareholders’ meeting at which a Board is elected. The Bylaws are such as generally found in corporations of this type and contain no unusual provisions. They provide for the regulation of the business and for the conduct of the affairs of the Company, the Board, and its shareholders. No amendments were made to the Bylaws during the examination period.

AGREEMENTS WITH AFFILIATES

The Company had the following significant agreements with its affiliated companies in effect, as of December 31, 2024:

General Agency Agreement

Effective August 1, 2007, the Company entered into an agreement with an affiliate, SteadPoint Insurance Group, Inc. (SIG), formerly known as Argos Group, Inc. Under the terms of the agreement, SIG provides the Company with services for day-to-day administration, underwriting, and policyholder services. During the current examination period, an amendment revised compensation for services from fee based to a cost-based methodology. The amended agreement was approved by the TDCI on December 26, 2023, retroactive to the effective date of October 1, 2023.

Claims Service Agreement

Effective August 1, 2007, the Company entered into an agreement with an affiliate, SteadPoint Risk Management Solutions, LLC (SRMS), formerly known as Argos Risk Management Services, LLC. Under the terms of the agreement, SRMS provides claims processing and administration to the Company. During the current examination period, an amendment revised compensation for services from fee-based to a cost-based methodology. The amended agreement was approved by the TDCI on December 26, 2023, retroactive to the effective date of October 1, 2023.

During review of intercompany transactions, the Company was unable to detail transactions, limiting the ability to determine if transactions were fair, reasonable and allocated properly in compliance with Tenn. Code Ann. § 56-11-106(a)(1)(C) and (D). The Company's books and records were not maintained clearly and accurately to support the reasonableness of the charges or fees as required by Tenn. Code Ann. § 56-11-106(a)(1)(E). See the "Comments and Recommendations" section of this report.

TERRITORY AND PLAN OF OPERATION

TERRITORY

As of December 31, 2024, the Company was licensed to transact business in the states of Alabama, Arkansas, Georgia, Louisiana, Mississippi, North Carolina, and Tennessee. As of the examination date, the Company was writing business in Alabama, Arkansas, Mississippi, and Tennessee.

Certificates of Authority granted by the licensed states were reviewed and found to be in force at December 31, 2024. The Company currently has no applications pending for admission to any other state or territory.

PLAN OF OPERATIONS

The Company provides workers' compensation coverage to its policyholders. The Company's business is produced by licensed individuals and licensed business entities. Duties are performed in accordance with the Company's agency agreement, which is signed by the producer. Under the terms of appointment of the agreement, the producer acts as an independent contractor. Additionally, as of year-end 2024, the Company assumed workers' compensation business from Benchmark Insurance Company ("Benchmark") written for policyholders in thirty (30) states.

GROWTH OF COMPANY

The following exhibit depicts certain aspects of the growth and financial history of the Company for the period subject to this examination, according to its annual statements filed with the Department:

Year	Admitted Assets	Liabilities	Capital and Surplus	Premiums Earned	Net Income
2024	$45,120,369	$27,475,876	$17,644,493	$17,093,014	$(1,290,754)
2023	$49,622,079	$27,500,696	$22,121,383	$16,426,408	$1,836,642
2022	$47,131,014	$26,418,618	$20,712,396	$18,323,413	$3,574,588
2021	$43,085,977	$24,149,226	$18,936,751	$16,515,895	$191,485
2020	$37,715,780	$19,795,092	$17,920,688	$13,337,240	$2,546,323

LOSS EXPERIENCE

As developed from applicable amounts included in the Company's annual statements, the ratios of losses and loss adjustment expenses (LAE) incurred to earned premiums, for the period subject to this examination were as follows:

Year	Losses Incurred	LAE Incurred	Premiums Earned	Loss Ratio
2024	$8,535,510	$2,498,319	$17,093,014	64.6%
2023	$6,848,507	$1,781,383	$16,426,408	52.5%
2022	$5,588,486	$1,655,580	$18,323,413	39.5%
2021	$8,653,205	$1,906,971	$16,515,895	63.9%
2020	$3,849,858	$1,138,575	$13,337,240	37.4%

REINSURANCE

Assumed Reinsurance

Effective July 1, 2022, the Company assumes fifty percent (50%) of workers' compensation policies written by Benchmark, up to $2,000,000 per occurrence. SteadPoint assumed business covering Benchmark insureds in thirty (30) states.

Ceded Reinsurance

The Company has reinsurance agreements in effect with several external reinsurance companies for the purpose of diversifying risk and limiting exposure on larger risks. The Company actively monitors the financial condition and industry ratings of its primary reinsurance partners. On December 31, 2024, all the Company's financially significant reinsurers were rated "A-", or better, by A.M. Best, an industry-recognized rating agency.

Quota Share Reinsurance

Effective July 1, 2022, the Company cedes fifty percent (50%) of workers' compensation policies written to Benchmark, up to $2,000,000 per occurrence. Coverage follows the underlying policies' territory.

Excess Reinsurance

Effective July 1, 2024, the Company has three (3) layers of excess of loss reinsurance per occurrence coverage. Each is as follows:

1st Layer Excess

The Company cedes one hundred percent (100%) of losses of $8,000,000 in excess of $2,000,000 per occurrence to multiple reinsurers. Coverage follows the underlying policies' territory.

2nd Layer Excess

The Company cedes one hundred percent (100%) of losses of $5,000,000 in excess of $10,000,000 per occurrence to multiple reinsurers. Coverage follows the underlying policies' territory.

3rd Layer Excess

The Company cedes one hundred percent (100%) of losses of $35,000,000 in excess of $15,000,000 per occurrence to multiple reinsurers. Coverage follows the underlying policies' territory.

Other Considerations

All of the Company’s significant reinsurance agreements were found to contain such language as recommended by NAIC guidelines and as required for reinsurance credit pursuant to Tenn. Code Ann. § 56-2-207(a)(2). All agreements appear to effectuate proper transfer of risk in accordance with Statement of Statutory Accounting Principles (SSAP) No. 62R and NAIC guidelines.

Trean Reinsurance Services, LLC was the reinsurance intermediary for all the reinsurance agreements.

ACCOUNTS AND RECORDS

During the course of the examination, certain balances were tested, and amounts were traced from the Company’s trial balance to the annual statement. The Company’s investment securities were confirmed with the custodian of such securities as of the date of this examination. All annual statements for the period under examination were reviewed for completeness and adequacy of disclosure. The Company’s risk-based capital filings were reviewed. These test checks and reviews revealed no material discrepancies.

The Company’s books and records are located in Birmingham, Alabama.

MARKET CONDUCT ACTIVITIES

A market conduct review was made of the Company, as of December 31, 2024, in conjunction with this examination. The following items were addressed:

Operations and Management Standards

The Company's Workers' Compensation Anti-Fraud Plan was reviewed for compliance with Tenn. Code Ann. § 56-47-112. The plan contained all required provisions, including procedures to prevent, detect, and investigate insurance fraud, employee education on fraud detection, provisions for fraud investigators, reporting to law enforcement, and pursuit of restitution where appropriate. The Company's policy applications and claim forms contained the required fraud warnings pursuant to Tenn. Code Ann. § 56-47-112(b). Regarding privacy, the Company is a workers' compensation insurer and is therefore exempt from privacy of consumer information regulations pursuant to Tenn. Comp. Rules & Regs. 0780-1-72-.02(2), which excludes information about individuals who obtain products or services for business, commercial, or agricultural purposes. Accordingly, the Company does not issue privacy notices to policyholders. However, the Company maintains privacy policies and employee requirements to protect nonpublic personal information. No issues were noted.

Complaint Handling Standards

The Company maintains a complaint register, as required by Tenn. Code Ann. § 56-8-104(11). The TDCI Consumer Insurance Services Division confirmed that no Company complaints were received during the five-year examination period (2020 through 2024). The Company also confirmed that no complaints were filed directly with SteadPoint during the examination period. The Company's complaint register and complaint handling procedures were reviewed and determined to be compliant with Tenn. Code Ann. § 56-8-104(11) and Tenn. Comp. Rules & Regs. 0780-01-05-.07.

Marketing and Sales Standards

The Company's advertising and sales materials were reviewed for compliance with Tenn. Code Ann. §§ 56-8-104(1), (2), and (3). No evidence of false, unfair, or misleading information was found. The Company's name, phone number, and email address were listed on materials, and the source of any statistics used was disclosed. Internal producer training materials and Company communications to producers were also reviewed. No evidence of unfair discrimination tactics or avoidance of statutory compliance was found. The Company was found to be in compliance.

Producer Licensing Standards

Tenn. Code Ann. §§ 56-6-101, *et seq.*, requires the Company to sell products and services through producers who are properly licensed and appointed. A list of producers who wrote Tennessee business for the Company in 2024 was obtained, and a random sample of producers was selected for testing. All active producers sampled were properly licensed in Tennessee and appointed by the Company according to the NAIC State Based Systems Website. The Company did not terminate any producer appointments during the examination period. The Company was found to be in compliance with Tenn. Code Ann. §§ 56-6-103, 56-6-104, and 56-6-115.

Policyholder Services Standards

The Company's timeliness of policy issuance, premium billing, response to policyholder requests, provision of adequate disclosures, and compliance with applicable statutes and rules were examined. The Company was found to be in compliance with the relevant market conduct standards.

Underwriting and Rating Standards

In the examination of the Company's underwriting procedures, rating standards, and policy administration, the examiners verified that all rates and forms used by the Company during the period of examination, January 1, 2020, through December 31, 2024, were filed with the TDCI Policy Analysis Section prior to their use, in accordance with Tenn. Code Ann. § 56-5-106. The examiners also verified that the Company was a member of the National Council on Compensation Insurance ("NCCI") and adhered to the policy forms and rating rules, classification system, and experience and retrospective rating plans filed by the designated rate service organization, in accordance with Tenn. Code Ann. § 56-5-120.

Examiners reviewed a sample of 2024 premium records from Tennessee and tested the premium rates billed to the filed rates with the state of Tennessee. The rates billed by the Company were found without exception to be in compliance with Tenn. Tenn. Code Ann. § 50-6-402; Tenn. Code Ann. § 56-5-106(c), (d), and (e); Tenn. Code Ann. § 56-5-120; and NCCI guidelines. The examiners also performed accuracy and completeness testing of 2024 premium written data for SteadPoint and assumed Benchmark policies. Examiners determined such data to be accurate and complete. Underwriting procedures, rating standards, and policy administration conducted by the Company appear to be in compliance with applicable Tennessee statutes, NCCI guidelines, and established Company practices.

Claims Handling Standards

In the examination of claims handling practices, the Company's efficiency of claim handling, accuracy of payment, adherence to contract provisions, and compliance with applicable statutes and rules were examined. In conducting the examination, random samples were selected from claims approved and from claims resisted by the Company.

Contact With Claimant

Tenn. Comp. Rules & Regs. 0800-02-14-.05(1) requires the adjuster to make contact with or attempt to contact the injured employee within two (2) business days of receiving notice of any injury. Examples in the records sampled were not in compliance with Tenn. Comp. R. & Regs. 0800-02-14-.05(1). See the "Recommendations" section of this report.

Tenn. Comp. Rules & Regs. 0800-02-14-.04(6) requires that within two (2) business days of receiving a verbal or written notice of any injury from an employer, the adjusting entity shall send a Notice of a Reported Injury and a copy of the Beginner's Guide to Tennessee Workers' Compensation on the forms prescribed by the Administrator to each employee's last known address via first class U.S. Mail. Examples in the records sampled were not in compliance with Tenn. Comp. R. & Regs. 0800-02-14-.04(6). See the "Recommendations" section of this report.

Investigation

Tenn. Comp. Rules & Regs. 0800-02-14-.04(9) requires the adjuster to file Form C-22 (Notice of First Payment of Compensation) with the Tennessee Bureau of Workers'

Compensation within five (5) business days of the initial payment of benefits. Also, the Company is required to file Form C-26 (Notice of Change of Termination of Compensation Benefits) within five (5) business days of a change or termination of the payment of compensation benefits. A sample of records reviewed reflected noncompliance with Tenn. Comp. R. & Regs. 0800-02-14-.04(9). See the “Recommendations” section of this report.

Payment of Benefits

Tenn. Comp. R. & Regs. 0800-02-14-.06(2)(a) requires compensation payments for an injury to be received by the claimant no later than fifteen (15) days after the date the disability begins. It also requires compensation benefits be issued timely to assure the injured employee receives the benefits no later than the date they are due. A sample of records reviewed reflected noncompliance with Tenn. Comp. R. & Regs. 0800-02-14-.06(2)(a). See the “Recommendations” section of this report.

Payment of Medical Costs

Tenn. Comp. R. & Regs. 0800-02-14-.07 and Tenn. Comp. R. & Regs. 0800-02-17-.10(7) require all medical costs owed for undisputed claims under the Tennessee Workers’ Compensation Law to be paid within thirty (30) days of receipt of invoice. A sample of records reviewed reflected noncompliance with Tenn. Comp. R. & Regs. 0800-02-14-.07 and Tenn. Comp. R. & Regs. 0800-02-17-.10(7). See the “Recommendations” section of this report.

SUBSEQUENT EVENTS

During the examination, a review of subsequent events was performed. Management stated in the Letter of Representation that they were not aware of any events subsequent to December 31, 2024, that could have a material effect on the Company’s financial condition. Our review confirmed the Company’s disclosures in its 2024 Annual Statement and in its Letter of Representation.

FINANCIAL STATEMENTS

There follows a statement of assets, liabilities, surplus and other funds, and a statement of income as of December 31, 2024, together with a reconciliation of capital and surplus for the period under review, as reported by the Company in its 2024 Annual Statement. *(Note: Immaterial differences in totals are due to rounding.)*

ASSETS

	Assets	Non-Admitted Assets	Net Admitted Assets
Bonds	$10,374,004		$10,374,004
Stocks:			
Common Stocks	3,304,259		3,304,259
Cash, cash equivalents, and short-term investments	4,986,668	$255,000	4,731,668
Investment income due and accrued	107,763		107,763
Premiums and considerations:			
Uncollected premiums and agents' balances in the course of collection	317,166	24,916	292,250
Deferred premiums, agents' balances and installments booked but deferred and not yet due	7,108,413	62,176	7,046,237
Reinsurance:			
Amounts recoverable from reinsurers	187,091		187,091
Funds held by or deposited with reinsured companies	19,131,987	3,706,832	15,425,155
Current federal and foreign income tax recoverable and interest thereon	550,638		550,638
Net deferred tax asset	1,767,259	190,773	1,576,486
Electronic data processing equipment and software	1,193,688	733,484	460,204
Receivables from parent, subsidiaries and affiliates	906,379		906,379
Aggregate write-ins for other-than-invested assets	314,003	155,768	158,235
Totals	$50,249,318	$5,128,949	$45,120,369

LIABILITIES, SURPLUS AND OTHER FUNDS

Losses		$15,005,924
Loss adjustment expenses		3,264,626
Other expenses		652,674
Taxes, licenses and fees		37,568
Borrowed money and interest thereon		540,795
Unearned premiums		6,653,850
Advance premium		46,508
Ceded reinsurance premiums payable		1,258,594
Funds held by company under reinsurance treaties		9,852
Remittances and items not allocated		5,485
Total Liabilities		27,475,876
Common capital stock	$1,200,222	
Gross paid in and contributed surplus	3,124,631	
Unassigned funds (surplus)	15,539,156	
Less treasury stock, at cost: 45 shares common	2,219,516	
Surplus as regards policyholders		17,644,493
Totals		$45,120,369

STATEMENT OF INCOME

Underwriting Income		
Premiums earned		$17,093,014
Losses incurred	$8,535,510	
Loss adjustment expenses incurred	2,498,319	
Other underwriting expenses incurred	9,496,860	
Total underwriting deductions		20,530,689
Net underwriting gain/(loss)		(3,437,675)
Investment Income		
Net investment income earned	553,965	
Net realized capital gains (losses) less capital gains tax	701,090	
Net investment gain/(loss)		1,255,055
Other Income		
Net gain or (loss) from agents' or premium balances	(112,661)	
Finance and service charges not included in premiums	63,940	
Aggregate write-ins for miscellaneous income	446,209	
Total other income		397,488
Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes		(1,785,132)
Federal and foreign income taxes incurred		(494,378)
Net Income		($1,290,754)

CAPITAL AND SURPLUS ACCOUNT

	2024	2023	2022	2021	2020
Surplus as regards policyholders, December 31 prior year	$22,121,383	$20,712,396	$18,936,751	$17,920,688	$14,489,015
Net income	(1,290,754)	1,836,642	3,574,588	191,485	2,546,323
Change in net unrealized capital gains or (losses)	(161,403)	66,964	(601,202)	760,269	343,564
Change in net deferred income tax	853,109	205,270	317,662	100,588	(27,213)
Change in non-admitted assets	(3,709,255)	(778,385)	(286,174)	309,693	242,540
Change in provision for reinsurance		14,975	447	(15,422)	
Aggregate write-ins for gains and losses in surplus	(165,587)	63,521	(1,229,676)	(330,550)	326,459
Change in surplus as regards policyholders for the year	(4,476,890)	1,408,987	1,775,645	1,016,063	3,431,673
Surplus as regards policyholders, December 31 current year	$17,644,493	$22,121,383	$20,712,396	$18,936,751	$17,920,688

ANALYSIS OF CHANGES IN FINANCIAL STATEMENTS

Total Capital and Surplus	$17,644,493

Total capital and surplus, as established by this examination, is the same as reported by the Company in its 2024 Annual Statement. There were no changes made to any asset or liability item as a result of our examination performed as of December 31, 2024.

COMMENTS AND RECOMMENDATIONS

The following list presents a summary of comments and recommendations noted in this report:

Comments

There were no comments noted during the completion of this examination.

Recommendations

1. The Company's records for affiliated transactions were insufficient to determine if the transactions were fair, reasonable, and allocated properly as required by Tenn. Code Ann. § 56-11-106(a)(1)(C) and (D). The Company's books and records were not maintained clearly and accurately to support the reasonableness of the charges or fees as required by Tenn. Code Ann. § 56-11-106(a)(1)(E).

   It is recommended that the Company maintain records of affiliated transactions to meet the requirements of Tenn. Code Ann. § 56-11-106(a)(1)(C) and (D) and Tenn. Code Ann. § 56-11-106(a)(1)(E).

2. As noted in the "Claims Handling Standards" section of this report, it was determined that the Company did not always make contact or attempt to contact the injured employee within two (2) business days of receiving notice of the injury in violation of Tenn. Comp. R. & Regs. 0800-02-14-.05(1).

   It is recommended that the Company comply with Tenn. Comp. R. & Regs. 0800-02-14-.05(1) by contacting or attempting to contact all injured employees as required.

3. As noted in the "Claims Handling Standards" section of this report, it was determined that the Company after receiving notice of an injury from an employer did not always send required material within two (2) business days as required by Tenn. Comp. R. & Regs. 0800-02-14-.04(6).

It is recommended that the Company comply with Tenn. Comp. R. & Regs. 0800-02-14-.04(6) by sending required materials to all injured employees as required.

4. As noted in the “Claims Handling Standards” section of this report, it was noted that the Company did not always file Form C-22 and or Form C-26 with the Tennessee Bureau of Workers Compensation as required by Tenn. Comp. R. & Regs. 0800-02-14-.04(9).

   It is recommended that the Company make sure that it files C-22 and C-26 forms in compliance with Tenn. Comp. R. & Regs. 0800-02-14-.04(9).

5. As noted in the “Claims Handling Standards” section of this report, it was noted that not all compensation payments were received by the claimant within fifteen (15) days after the disability begins as required by Tenn. Comp. R. & Regs. 0800-02-14-.06(2)(a).

   It is recommended that the Company comply with Tenn. Comp. R. & Regs. 0800-02-14-.06(2)(a) by making sure compensation payments meet the requirements.

6. As noted in the “Claims Handling Standards” section of this report, it was noted that not all medical costs owed for undisputed claims were paid within thirty (30) days of receipt of the invoice as required by Tenn. Comp. R. & Regs. 0800-02-14-.07 and Tenn. Comp. R. & Regs. 0800-02-17-.10(7).

   It is recommended that the Company comply with Tenn. Comp. R. & Regs. 0800-02-14-.07 and Tenn. Comp. R. & Regs. 0800-02-17-.10(7) which require all medical costs owed for undisputed claims to be paid with thirty (30) days of receipt of invoice.

CONCLUSION

Rules and procedures as prescribed by the statutes of the state of Tennessee and guidance from the NAIC Handbook, as deemed appropriate, have been followed in connection with the verification and valuation of assets and the determination of liabilities of SteadPoint Insurance Company.

In such manner, it was found that as of December 31, 2024, the Company had admitted assets of $45,120,369, and liabilities, exclusive of capital and surplus, of $27,475,876. Thus, there existed for the additional protection of the policyholders, the amount of $17,644,493 in the form of common capital stock, gross paid in and contributed surplus, and unassigned funds, less treasury stock. Tenn. Code Ann. §§ 56-2-114 and 56-2-115 require an insurer of this Company's type to maintain a minimum capital of $1,000,000 and minimum surplus of $1,000,000. For this examination, as of December 31, 2024, the Company maintains capital and surplus sufficient to satisfy those requirements.

The courteous cooperation of the officers and employees of the Company, extended during the course of the examination, is hereby acknowledged.

In addition to the undersigned, Changyoon Baek, APIR, James Pearce, MCM, Rhonda Bowling-Black, CFE, ARe, MCM, and Jay Uselton, CFE, Supervising Examiner, from the State of Tennessee participated in the work of this examination. Additional participants include actuarial specialists Lance Sakurada and Solomon Frazier, FSA, FCAS, MAAA, of Examination Resources, LLC. Contracted specialists James Gowins, CISA, AES, AFE, and Steven Sigler, CISA, AES, CFE, of Examination Resources, LLC, participated in the Information Systems review of this examination.

Respectfully submitted,

Don Karnes

Don Karnes, CFE, MCM
Examiner-in-Charge
State of Tennessee

CERTIFICATION

The undersigned certifies and says that he has duly executed the attached examination report of SteadPoint Insurance Company located in Birmingham, Alabama, dated May 19, 2026, and made as of December 31, 2024, on behalf of the Tennessee Department of Commerce and Insurance. The undersigned further says he is familiar with such instrument and the contents thereof, and the facts therein set forth are true to the best of his knowledge, information, and belief.

Don Karnes

Don Karnes, CFE, MCM
Examiner-in-Charge
State of Tennessee

EXHIBIT B

SteadPoint

Insurance That's A Breed Apart.

June 9, 2026

Bryant Cummings
Director of Financial Examinations/Chief Examiner
Tennessee Department of Commerce and Insurance
500 James Robertson Parkway
Nashville, TN 37243-1135

RE: **Report of Examination – SteadPoint Insurance Company**

Dear Mr. Cummings:

We hereby acknowledge receipt of the final Report of Examination for SteadPoint Insurance Company, made as of December 31, 2024.

By signing below, we indicate acceptance of the report, as transmitted, and without rebuttal.

Sincerely,

Charles E. Bryan III

Charles E. Bryan III
President & CEO
SteadPoint Insurance Company