STATE OF NEBRASKA
DEPARTMENT OF INSURANCE

JUL 0 2 2026

FILED

CERTIFICATION

July 2, 2026

I, Eric Dunning, Director of Insurance of the State of Nebraska, do hereby certify that the attached is a full and correct copy of the Financial Examination Report of

STONETRUST COMMERCIAL INSURANCE COMPANY

AS OF

DECEMBER 31, 2024

The report is now on file and forming a part of the records of this Department.

I hereto subscribe my name under the seal of my office at Lincoln, Nebraska.

GREAT SEAL OF THE STATE OF NEBRASKA
EQUALITY BEFORE THE LAW
MARCH 1ST 1867

DIRECTOR OF INSURANCE

CERTIFICATE OF ADOPTION

Notice of the proposed report for the financial examination of

STONETRUST COMMERCIAL INSURANCE COMPANY

5615 CORPORATE BOULEVARD, SUTE 800

BATON ROUGE, LA 70808

dated as of December 31, 2024, verified under oath by the examiner-in-charge on June 4, 2026, and received by the company on June 8, 2026, has been adopted without modification as the final report pursuant to Neb. Rev. Stat. § 44-5906(3) (a).

Dated this 22nd day of June 2026.

STATE OF NEBRASKA
DEPARTMENT OF INSURANCE

Tadd K. Wegner

Tadd Wegner, CFE
Chief Financial Regulator

STATE OF NEBRASKA

Department of Insurance

EXAMINATION REPORT

OF

STONETRUST COMMERCIAL INSURANCE COMPANY

as of

December 31, 2024

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Baton Rouge, Louisiana
May 14, 2026

Honorable Eric Dunning
Director of Insurance
Nebraska Department of Insurance
1526 K Street, Suite 200
Lincoln, Nebraska 68508

Dear Sir:

Pursuant to your instruction and authorizations, and in accordance with statutory requirements, an examination has been conducted of the financial condition and business affairs of:

STONETRUST COMMERCIAL INSURANCE COMPANY

which has its Statutory Home Office located at

13810 FNB Pkwy, Suite 200
Omaha, Nebraska 68154

with its Principal Executive Office located at

5615 Corporate Boulevard, Suite 800
Baton Rouge, Louisiana 70808

(hereinafter also referred to as the "Company"), and the report of such examination is respectfully presented herein.

INTRODUCTION

The State of Nebraska last examined the Company as of December 31, 2020. The current financial condition examination covers the intervening period to, and includes the close of business on December 31, 2024 and such subsequent events and transactions as were considered pertinent to this report. The State of Nebraska participated in this examination and assisted in the preparation of this report.

The same examination staff conducted a concurrent financial condition examination of the Company's subsidiary, Stonetrust Premier Casualty Insurance Company (Stonetrust Premier).

SCOPE OF EXAMINATION

The examination was conducted pursuant to and in accordance with both the NAIC Financial Condition Examiners Handbook (Handbook) and Section §44-5904(1) of the Nebraska Insurance Statutes. The Handbook requires that examiners plan and perform the examination to evaluate the financial condition and identify prospective risks of the Company by obtaining information about the Company, including but not limited to: corporate governance, identifying and assessing inherent risks within the Company, and evaluating system controls and procedures used to mitigate those risks. The examination also includes 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 when applicable to domestic state regulations.

The Nebraska Department of Insurance made a general review of the Company's operations and the manner in which its business has been conducted in order to determine compliance with statutory and charter provisions. The Company's history was traced and has been set out in this report under the caption "Description of Company." All items pertaining to management and control were reviewed, including provisions for disclosure of conflicts of interest to the Board of Directors and the departmental organization of the Company. The Articles of Incorporation and By-Laws were reviewed, including appropriate filings of any changes or amendments thereto. The minutes of the meetings of the Shareholder, Board of Directors, and committees held during the examination period were read and noted. Attendance at meetings, proxy information, election of Directors and Officers, and approval of investment transactions were also noted.

The fidelity bond and other insurance coverages protecting the Company’s property and interests were reviewed, as was the Company’s defined contribution 401(k) plan. Certificates of Authority to conduct the business of insurance in the various states were inspected, and a survey was made of the Company’s general plan of operation.

Data reflecting the Company's growth during the period under review, as developed from the Company's filed annual statements, is reflected in the financial section of this report under the caption “Body of Report.”

The Company's reinsurance facilities were ascertained and noted and have been commented upon in this report under the caption “Reinsurance.” Accounting records and procedures were tested to the extent deemed necessary through the risk-focused examination process. The Company’s method of claims handling and procedures pertaining to the adjustment and payment of incurred losses were also noted.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This included a review of workpapers prepared by EisnerAmper, LLP and Forvis Mazars, LLP, the Company’s external auditors, during their audit of the Company’s accounts for the years ended December 31, 2023, and 2024. Portions of the auditors’ workpapers have been incorporated into the workpapers of the examiners and have been utilized in determining the scope and areas of emphasis in conducting the examination. This utilization was performed pursuant to Title 210 (Rules of the Nebraska Department of Insurance), Chapter 56, Section 013.

Any failure of items to add to the totals shown in schedules and exhibits appearing throughout this report is due to rounding.

DESCRIPTION OF COMPANY

HISTORY

The Company was organized under the laws of the state of Louisiana as Amicus Mutual Insurance Company in March 2000. The Company received a Certificate of Authority to write workers' compensation insurance in Louisiana on June 30, 2000, and began operations on July 1, 2000.

Effective January 1, 2006, Amicus Mutual Insurance Company converted from a mutual insurance company to a stock insurance company, which was wholly owned by a mutual holding company parent, Stonetrust Commercial Mutual Insurance Holding Company. The Company amended its Articles of Incorporation and By-Laws and changed its name to Stonetrust Commercial Insurance Company. The conversion from a mutual insurer to a stock insurer with a mutual holding company parent was approved by the policyholders and the Louisiana Department of Insurance.

Effective January 3, 2014, the Company formed a 100% owned subsidiary company, Stonetrust Realty, LLC (Stonetrust Realty). During 2014, the Company contributed $5,350,000 to Stonetrust Realty to fund its operations. Stonetrust Realty ceased operations on December 31, 2018, and was subsequently dissolved effective July 18, 2019.

Effective December 31, 2014, with approval from the Louisiana Department of Insurance and its policyholders, the immediate parent of the Company, Stonetrust Commercial Mutual Insurance Holding Company, demutualized and was renamed as Stonetrust Holding Company (Stonetrust Holding). Immediately following the demutualization, Stonetrust Holding and its subsidiaries, as well as Stonetrust Management Services, LLC (the Company's MGA), were purchased by Dhandho Holdings Corporation (Dhando Holdings). Stonetrust Management Services, LLC was dissolved effective December 20, 2016.

Effective August 30, 2016, the Company redomesticated from the State of Louisiana to the State of Nebraska. Effective December 31, 2016, the Company's former parent company, Stonetrust Holding, was merged into the Company leaving Dhando Holdings as the Company's direct parent.

Effective January 1, 2018, the Company was acquired by Wintaai Holdings Ltd. (Wintaai Holdings) for a purchase price of $40,000,000, among other payments, on the anniversary of the closing. Wintaai Holdings is a unit of the Toronto-based investment advisory firm, Chou Associates Management Inc. and is the ultimate controlling person.

Effective November 30, 2018, Stonetrust Premier was formed as a wholly-owned insurance company subsidiary of the Company.

During 2022, Wintaai Holdings, the Company's direct parent at the time, formed a wholly-owned subsidiary, Wintaai America Inc., a Delaware corporation. Effective December 31, 2022, Wintaai Holdings, transferred its 99.6% ownership in the Company to Wintaai America Inc. On November 1, 2024, Wintaai America Inc. purchased 25,550 shares from other Shareholders to increase its ownership state to 99.9% with the remaining 0.1% being owned by various current and former employees of the Company.

MANAGEMENT AND CONTROL

Holding Company

The Company is a member of an insurance holding company system as defined by Nebraska Statute. An organizational listing flowing from the "Ultimate Controlling Person," as reported in the 2024 Annual Statement, is represented by the following (subsidiaries are denoted through the use of indentations, and unless otherwise indicated, all subsidiaries are 100% owned):

Francis Chou
- 2665411 Ontario Inc.
- Chou Associates Management Inc.
  - Wintaai Holdings Ltd. (80.3% owned by Chou Associates Management Inc.; 3.0% by 2665411 Ontario Inc.; and 16.7% by other investors)
    - Wintaai America Inc. (99% owned by Wintaai Holdings Ltd.)
      - Stonetrust Commercial Insurance Company (99.9% owned by Wintaai America, Inc. and 0.1% by certain Officers and Directors of the Company)
        - Stonetrust Premier Casualty Insurance Company
      - Loggerhead Holding Company LLC (90% owned by Wintaai America Inc.; 10% other investors)
        - Loggerhead Risk Management, LLC
        - Loggerhead Risk Management Services Holding Corp
        - Loggerhead Risk Management Services, LLC (99% owned by Loggerhead Holding Company LLC and 1% by Loggerhead Risk Management Services Holding Corp)

<u>Shareholders</u>

Article V of the Company's Articles of Incorporation states that, "the aggregate number of shares which this Corporation shall have authority to issue Forty Million (40,000,000) shares, having a par value of Six Hundred Twenty-Five Thousandths 00/100 Dollars ($0.625) each."

On May 7, 2019, the Company performed a 4,000:1 stock split, resulting in an increase in the number of authorized shares from 10,000 to 40,000,000 and the outstanding shares from 1,000 to 4,000,000 with a par value of $0.625 per share, all of which were owned by Wintaai Holdings.

Effective June 14, 2019, Wintaai Holdings sold 10,600 of its 4,000,000 shares to various board members and employees of the Company, and effective July 28, 2020, Wintaai Holdings sold 7,100 of its 3,989,400 shares to various board members.

As of December 31, 2024, the Company records indicate that 4,000,000 are issued and outstanding, of which, 3,997,536 are owned by Wintaai America Inc. and 2,464 are owned by various current and former employees of the Company.

The Company paid dividends in the amount of $10,044,447 in 2023. No other dividends were paid during the period under examination.

Article II(a) of the Company's By-Laws states that, "the annual meeting of Shareholders shall be held on or before the 30th day of June in each and every calendar year…". The 2024 joint meeting of the Company and Stonetrust Premier was held on June 5, 2024, at the Company's home office.

Board of Directors

Article III(a) of the Company's By-Laws states that, "the business and affairs of the Corporation shall be managed by its Board of Directors." Article III(b) of the Company's By-Laws states that, "the number of Directors of the Corporation shall be no fewer than five (5), the exact number to be determined by the Shareholders. Each Director shall hold office until the next annual meeting of Shareholders, and until his or her successor shall have been elected and qualified, or until his or her death, resignation or removal. Each Director shall qualify as a Director of the Corporation under applicable insurance laws of the State of Nebraska, and at least one Director shall be a resident of the State of Nebraska. Subject to the laws of the State of Nebraska, the permissible number of Directors may be increased or decreased from time to time by amendment to these By-Laws, but no decrease shall have the effect of shortening the term of any incumbent Director."

The following persons were serving as Directors at December 31, 2024:

Name and Residence	Principal Occupation
Francis S. M. Chou Toronto, ON Canada	President, Chief Executive Officer, Chou Associates Management Inc.
Michael G. Dileo Baton Rouge, LA	President, Chief Executive Officer, Stonetrust Commercial Insurance Company, and Stonetrust Premier Casualty Insurance Company
David A. Fluker Port Allen, LA	President/Owner, Fluker Farms
Lawrence F. Harr Omaha, NE	Attorney, Lamson Dugan & Murray, LLP
Grady R. Hazel, Chairman* Baton Rouge, LA	Certified Public Accountant, Grady R. Hazel CPA

* Mr. Hazel passed away on February 19, 2026 and has not been replaced as of the date of this report.

Officers

Article IV(a) of the Company's By-Laws states that, "the Officers of the Corporation shall be a President, a Secretary, and a Treasurer, each of whom shall be elected by the Board of Directors. Such other Officers and Assistant Officers as may be deemed necessary, including Chair of the Board or one or more Vice Presidents, may be elected or appointed by the Board of Directors. All executive Officers shall be persons who are known to be capable of running the affairs of an insurance company and who otherwise qualify as executive Officers of an insurance company under Nebraska insurance law. Any two (2) or more offices may be held by the same person except as may otherwise be required by law."

The following is a listing of Officers elected and serving the Company at December 31, 2024:

Name	Office
Michael G. Dileo	President and Chief Executive Officer
M. Shane Treigle	Treasurer and Chief Financial Officer

Name	Office
Melanie J. Forbes	Secretary, General Counsel and Vice President of Claims
Robert F. Wolf	Vice President and Chief Actuary

Committees

The Company's Articles of Incorporation and By-Laws do not address required or allowed Board Committees. As of the examination date, the Company had an Audit Committee and Investment Committee.

The following persons were serving on the Audit Committee at December 31, 2024:

David A. Fluker
Lawrence F. Harr
Grady R. Hazel

The following persons were serving on the Investment Committee at December 31, 2024:

Michael G. Dileo
M. Shane Treigle
Francis S. M. Chou

TRANSACTIONS WITH AFFILIATES

RBC Maintenance Agreement

Effective January 1, 2018, the Company entered into an RBC Maintenance Agreement with Chou Associates Management Inc., whereby Chou Associates Management Inc. agrees to contribute capital to the Company in the event its RBC ratio falls below 350%. The Agreement was a requirement of the Nebraska Department of Insurance approval of Wintaai's Holdings purchase of the Company. This agreement terminated in 2022.

Tax Sharing and Allocation Agreement

Effective January 1, 2019, the Company's federal income tax return was consolidated with Stonetrust Premier and Stonetrust Realty. Stonetrust Realty was dissolved effective July 18, 2019. Under terms of the Tax Sharing and Allocation Agreement, the Company files consolidated federal tax returns for the consolidated group. The consolidated tax liability is allocated among affiliates on a separate return basis with current credit for any net operating losses or other items utilized in the consolidated tax return. The agreement was not disapproved by the Nebraska Department of Insurance on July 1, 2019.

<u>Intercompany Management Cost Sharing and Cost Allocation Agreement</u>

Effective, January 1, 2020, the Company and Stonetrust Premier entered into a Cost Sharing and Cost Allocation Agreement. Under the agreement, the Company provides certain goods, third party services, management, and other direct services to Stonetrust Premier since it has no employees. Stonetrust Premier is charged for its allocable share of the Company's actual costs, and a monthly management services charge. The charge is based on the greater of monthly direct gross earned premium times net expense ratio plus 5% or $5,000. The agreement was not disapproved by the Nebraska Department of Insurance on October 30, 2019. The Company recognized fees of $278,122 under this agreement in 2024.

<u>Services Agreement</u>

Effective September 2, 2020, the Company became a participant into a Services Agreement with Chou Associates Management Inc., whereby Tracy Chou, an employee of Chou Associates Management Inc., will provide professional services to the Company. Tracy Chou is responsible for developing, maintaining, and providing overview of the Company's claims, actuarial, and investment operations, as detailed in the agreement. The Company will reimburse Chou Associates Management Inc. for the services provided pursuant to the agreement in the amount of $215,000 annually, plus reasonable travel expenses. The agreement was not disapproved by the Nebraska Department of Insurance on September 2, 2020. The Company reported professional services expenses of $215,004 in 2024.

Collateral Loan Agreement

Effective October 14, 2022, the Company issued a collateral loan of $30,000,000 to an affiliate company, Loggerhead Holding Company, LLC (Loggerhead), a subsidiary of Wintaai America, Inc. This loan was secured by a promissory note payable at a 9% fixed interest rate. This transaction was not disapproved by the Nebraska Department of Insurance on October 6, 2022.

On June 17, 2024, another collateral loan of $30,000,000 was issued to Loggerhead, and the original promissory note was cancelled. A new promissory note was issued simultaneously in the amount of $60,000,000 and is payable at a 12% fixed interest rate. This transaction was not disapproved by the Nebraska Department of Insurance on May 14, 2024. The Company recognized $5,570,000 of interest income from this loan in 2024.

Investment Management Agreement

Effective January 1, 2023, the Company became a participant in an Investment Management Agreement with Chou Associates Management Inc., whereby Chou Associates Management Inc. provides investment supervision and direction for all investments to the Company. This agreement replaced the prior agreement dated July 1, 2019. The agreement was not disapproved by the Nebraska Department of Insurance on November 9, 2022. The Company reported investment management expenses of $1,611,876 in 2024.

TERRITORY AND PLAN OF OPERATION

As evidenced by current or continuous Certificates of Authority, the Company is licensed to transact business in the following 18 states:

Alabama	Kentucky	Oklahoma
Arkansas	Louisiana	South Carolina
Georgia	Mississippi	South Dakota
Indiana	Missouri	Tennessee

Iowa	Nebraska	Texas
Kansas	North Carolina	West Virginia

The Company is a monoline carrier writing workers' compensation insurance. The Company targets small to medium-sized employers in construction, wholesale, retail, manufacturing, and other services-related industries. As of the date of this examination, the Company was not actively writing in the states of Indiana, Kentucky, North Carolina, South Carolina, South Dakota, and West Virginia.

The Company writes its business under the independent agent model and has contracts with approximately 440 agencies as of December 31, 2024.

REINSURANCE

Assumed

The Company assumes reinsurance through its participation in two mandatory workers' compensation pools in the state of Mississippi: the Mississippi Workers' Compensation Reinsurance Pool, and the National Workers' Compensation Reinsurance Pool.

Effective April 1, 2020, the Company and Stonetrust Premier entered into an Intercompany Quota Share Reinsurance Contract. Under the agreement, Stonetrust Premier will cede 100% of its gross premium, losses and expenses to the Company when it begins writing business. The agreement was not disapproved by the Nebraska Department of Insurance on February 18, 2020.

Ceded

The Company obtains Excess of Loss reinsurance through a reinsurance intermediary utilizing a reinsurance program comprised of five layers. During the examination period, the Company ceded the excess of loss business through a series of one year agreements, each of which reinsure one accident year.

For 2024, after consideration of an annual aggregate deductible of $750,000, the Company retained the first $750,000 of loss for any one loss occurrence with the reinsurers assuming 100% of the loss in excess of $750,000 based upon their participation in the specific excess of loss layer up to a maximum of $40,000,000. The retention by reinsurer and by layer is provided in the table below:

Reinsurer	$1.25M XS $750K ($1M AAD)	$3M XS $2M	$5M XS $5M	$10M XS $10M	$20M XS $20M
Safety National Casualty Corporation	45.00%	87.50%	72.50%	50.00%	
Partner Re	15.00%	10.00%	15.00%		
WCF National Insurance Company	40.00%	2.50%	12.50%	10.00%	10.00%
Arch Reinsurance				10.00%	20.00%
Markel Bermuda Limited				15.00%	22.50%
Lloyd's Syndicate No. 3000 MKL				5.00%	
Tokio Marine KILN Syndicates Ltd.					10.00%
Houston Casualty Company					5.03%
Lloyd's Syndicates No. 1686, 2987, 4711				10.00%	10.00%
Lloyd's Syndicates No. 609, 1414, 3000					22.47%
	100.0%	100.0%	100.0%	100.0%	100.0%

General

All contracts reviewed contained standard insolvency, arbitration, errors and omissions, and termination clauses where applicable. All contracts contained the clauses necessary to assure reinsurance credits could be taken.

BODY OF REPORT

GROWTH

The following comparative data reflects the growth of the Company during the period covered by this examination:

	2021	2022	2023	2024
Bonds	$ 50,493,507	$ 64,472,714	$ 57,373,754	$ 17,963,222
Common stocks	101,853,853	69,695,761	84,131,896	94,029,764
Cash and short-term investments	78,254,967	43,605,141	56,407,465	80,959,746
Admitted assets	254,139,249	230,808,847	253,554,239	278,230,539
Losses	61,822,523	54,327,606	54,856,486	53,973,198
Total liabilities	113,336,856	97,968,330	104,030,702	107,566,625
Capital and surplus	140,802,393	132,840,517	149,523,537	170,663,914
Premiums earned	44,777,401	48,074,432	51,756,323	51,125,077
Net investment income	8,157,953	2,896,269	6,791,057	9,165,587
Losses incurred	7,974,687	6,141,132	15,803,931	14,461,421
Net income	25,413,002	15,299,975	9,242,589	12,946,440

FINANCIAL STATEMENTS

The following financial statements are based on the statutory financial statements filed by the Company with the State of Nebraska Department of Insurance and present the financial condition of the Company for the period ending December 31, 2024. The accompanying comments on financial statements reflect any examination adjustments to the amounts reported in the annual statements and should be considered an integral part of the financial statements. A reconciliation of the capital and surplus account for the period under review is also included.

FINANCIAL STATEMENT

December 31, 2024

Assets	Assets	Assets Not Admitted	Net Admitted Assets
Bonds	$ 17,963,222		$ 17,963,222
Common stocks	94,029,764		94,029,764
Cash and short-term investments	80,959,746		80,959,746
Derivatives	1,318,625		1,318,625
Other invested assets	60,000,000		60,000,000
Subtotal, cash and invested assets	$254,271,357		$254,271,357
Investment income due and accrued	173,012		173,012
Uncollected premiums and agents' balances in the course of collection	1,522,069		1,522,069
Deferred premiums, agents' balances and installments booked but deferred and not yet due	17,946,970	$194,937	17,752,033
Current federal and foreign income tax recoverable	1,895,065		1,895,065
Guaranty funds receivable or on deposit	922,178		922,178
Electronic data processing equipment and software	239,358	239,358	
Furniture and equipment, including health care delivery assets	188,169	188,169	
Receivables from parent, subsidiaries and affiliates	76,072		76,072
Prepaid expenses	170,988	170,988	0
Receivables from Second Injury Fund	1,618,753		1,618,753
Total assets	$279,023,991	$793,452	$278,230,539

Liabilities, Surplus, and Other Funds

Losses	$ 53,973,198
Reinsurance payable on paid losses and loss adjustment expenses	67,542
Loss adjustment expenses	9,983,598
Commissions payable, contingent commissions and other similar charges	3,610,326
Other expenses	2,667,320
Taxes, licenses and fees	3,513,887
Net deferred tax liability	8,345,728
Unearned premiums	22,309,082
Advance premium	776,103
Ceded reinsurance premiums payable	(166,907)
Remittances and items not allocated	147,623
Payable to parent, subsidiaries and affiliates	452,663
Derivatives	984,367
Policyholder security deposits	877,187
Liability on amounts due under loss portfolio transfer	24,908
Total liabilities	$107,566,625
Common capital stock	$2,500,000
Gross paid-in and contributed surplus	32,500,000
Unassigned funds	135,663,914
Total capital and surplus	$170,663,914
Total liabilities, capital and surplus	$278,230,539

STATEMENT OF INCOME – 2024

Underwriting Income

Premiums earned	$51,125,077
Losses incurred	$14,461,421
Loss adjustment expenses incurred	5,103,940
Other underwriting expenses incurred	22,957,274
Total underwriting deductions	$42,522,635
Net underwriting gain	$ 8,602,442

Investment Income

Net investment income earned	$ 9,165,587
Net realized capital gain	(1,118,161)
Net investment gain	$ 8,047,426

Other Income

Net gain from agents' or premium balances charged off	$ (323,194)
Finance and service charges not included in premiums	216,397
Total other income	$ (106,797)
Net income before federal income taxes	$16,543,071
Federal income taxes incurred	3,596,631
Net income	$12,946,440

CAPITAL AND SURPLUS ACCOUNT

	2021	2022	2023	2024
Capital and surplus, beginning	$ 97,725,894	$140,802,393	$132,840,517	$149,523,537
Net income	$ 25,413,002	$ 15,299,975	$ 9,242,589	$ 12,946,440
Change in net unrealized capital gains	17,210,311	(20,083,633)	17,036,586	7,829,642
Change in net deferred income tax	(82,148)	374,899	159,018	91,720
Change in nonadmitted assets	535,334	446,883	289,274	272,575
Change in surplus notes		(4,000,000)		
Dividends to Stockholders			(10,044,447)	
Net change for the year	$ 43,076,499	$ (7,961,876)	$ 16,683,020	$ 21,140,377
Capital and surplus, ending	$140,802,393	$132,840,517	$149,523,537	$170,663,914

EXAMINATION CHANGES IN FINANCIAL STATEMENTS

Unassigned funds (surplus) in the amount of $135,663,914, as reported in the Company's 2024 Annual Statement, has been accepted for examination purposes. Examination findings, in the aggregate, were considered to have no material effect on the Company's financial condition.

COMPLIANCE WITH PREVIOUS RECOMMENDATIONS

The recommendations appearing in the previous report of examination are reflected below together with the remedial actions taken by the Company to comply therewith:

Custodial Agreements – It was recommended that the Company's Board of Directors or Investment Committee authorize the Custodial Agreements by resolution.

Action: The Company has complied with this recommendation.

Actuarial Reporting – It was recommended that the Actuarial Report complies with the narrative component and technical component requirements of the Annual Statement Instructions.

Action: The Company has complied with this recommendation.

COMMENTARY ON CURRENT EXAMINATION FINDINGS

There are no comments or recommendations that have been made as a result of this examination.

SUBSEQUENT EVENTS

STOCKHOLDER DIVIDEND

The Company paid dividends in the amount of $30,000,000 to its Stockholders on September 25, 2025.

SUMMARY OF COMMENTS AND RECOMMENDATIONS

There are no comments or recommendations that have been made as a result of this examination.

ACKNOWLEDGMENT

The courteous cooperation extended by the Officers and employees of the Company during this examination is hereby acknowledged.

In addition to the undersigned, Kristina Sampson, CPA, and Emma Muambo, CFE (Fraud), Financial Examiners; Stefan Obereichholz-Bangert, AES, CISA, CISM, and Dylan Smith, Information Systems Specialists, all with the firm Noble Consulting Services, Inc.; and Solomon Frazier, FSA, FCAS, MAAA, Actuarial Examiner, with Taylor-Walker Consulting, LLC; contracted by the Nebraska Department of Insurance; participated in this examination and assisted in the preparation of this report.

Respectfully submitted,

Shannon Hopkins

Shannon Hopkins, CFE
Examiner-in Charge
Noble Consulting Services, Inc.
Representing the Department of Insurance
State of Nebraska

Skyler Lawyer, CFE
Assistant Chief Examiner - Field
Department of Insurance
State of Nebraska

State of Pennsylvania,

County of Lackawanna,

Shannon Hopkins, being duly sworn, states as follows:

1. I have authority to represent the Department of Insurance of the State of Nebraska in the examination of Stonetrust Commercial Insurance Company and Stonetrust Premier Casualty Insurance Company.

2. The Department of Insurance of the State of Nebraska is accredited under the National Association of Insurance Commissioners Financial Regulation Standards and Accreditation.

3. I have reviewed the examination work papers and examination report, and the examination of Stonetrust Commercial Insurance Company and Stonetrust Premier Casualty Insurance Company was performed in a manner consistent with the standards and procedures required by the Department of Insurance of the State of Nebraska.

The affiant says nothing further.

Shannon Hopkins
Examiner-in-Charge's Signature

Subscribed and sworn before me by Deborah Estep on this 4 day of June, 2026.

Deborah Estep
Notary Public

My commission expires 9-29-29 [date].

Commonwealth of Pennsylvania – Notary Seal
Deborah Estep, Notary Public
Lackawanna County
My Commission Expires September 29, 2029
Commission Number 1462948