



**NOTICE TO INTERESTED PARTIES
OF THE
XL AMERICA, INC. EMPLOYEE SAVINGS PLAN**

The Internal Revenue Service (“IRS”) reviews tax qualified retirement plans to determine whether they comply with Internal Revenue Code rules, which allow employers to provide tax favored benefits to employees. XL America, Inc. (“XL America”) will submit an application to the IRS to confirm the qualified status of the XL America, Inc. Employee Savings Plan (the “Plan”). XL America intends the Plan to be tax qualified, and does not intend to change existing eligibility or benefit provisions as a result of the IRS’ review.

In connection with the review process, XL America is required to inform participants of their right to submit comments to the IRS and Department of Labor regarding the Plan’s compliance with applicable Internal Revenue Code rules.

Please note, the content of this notice is based on IRS model language and does not require any action on your part.

1. Notice to all current employees of XL America, Inc.

An application is to be made to the IRS for an advance determination on the qualification of the following employee savings plan:

2. Name of Plan: XL America, Inc. Savings Plan

3. Plan Number: 002

4. Name and Address of Applicant:

XL America, Inc.
Seaview House
70 Seaview Avenue
Stamford, CT 06902-6066

5. Applicant EIN: 06-1516268

6. Name and Address of Plan Administrator:

XL America, Inc.
Seaview House
70 Seaview Avenue
Stamford, CT 06902-6066

7. The application will be filed on November 13, 2020 for a determination as to whether the Plan meets the qualification requirements of Section 401 of the Internal Revenue



Code of 1986, with respect to the Plan's amendments and restatements. The application will be filed with:

Internal Revenue Service
TE/GE Stop 31A Team 105
P.O. Box 12192
Covington, KY 41012-0192

8. An individual was eligible to participate in the Plan if he or she was a common law employee of the Plan, the AXA US Holdings, Inc. 401(k) Profit Sharing Plan ("AXA Holdings Plan"), and the AXA Matrix Risk Consultants, Inc. 401(k) Profit Sharing Plan ("AXA Matrix Plan") and was treated as an employee for purposes of employment and wage withholding taxes. Notwithstanding the foregoing, union employees, non-resident employees, leased employees, interns, any employee who is accruing pension benefits in a plan or under a system in a country other than the United States or is hired with the understanding that his/her employment will be terminated at the completion of the project, unless the employee's terms of employment with the employer expressly provide that the employee is an Eligible Employee, or temporary employees of the AXA Holdings Plan were not eligible to participate in the Plan. The Plan is applying for a determination letter as a result of the merger of the AXA Holdings Plan and the AXA Matrix Plan into the Plan. All employees who are over 21, who are not leased employees, union employees, or non-resident aliens, are eligible to participate in the AXA Holdings Plan. All employees of the AXA Matrix Plan who are not leased employees are eligible for the AXA Matrix Plan and thus the applicable groups are being merged into the Plan.

RIGHTS OF INTERESTED PARTIES

10. You have the right to submit to EP Determinations, either individually or jointly with other interested parties, your comments as to whether the Plan meets the qualification requirements of the Internal Revenue Code. Your comments to EP Determinations may be submitted to:

Internal Revenue Service
EP Determinations
Attn: Customer Service Manager
P.O. Box 2508
Cincinnati, OH 45202

You may instead, individually or jointly with other interested parties, request the Department of Labor to submit, on your behalf, comments to EP Determinations regarding the qualification of the Plan. If the Department declines to comment on all or



some of the matters you raise, you may, individually, or jointly if your request was made to the Department jointly, submit your comments on these matters directly to EP Determinations at the Cincinnati address above.

REQUESTS FOR COMMENTS BY THE DEPARTMENT OF LABOR

11. The Department of Labor may not comment on behalf of interested parties unless requested to do so by the lesser of 10 employees or 10 percent of the employees who qualify as interested parties. The number of persons needed for the Department to comment with respect to the Plan is 10. If you request the Department to comment, your request must be in writing and must specify the matters upon which comments are requested, and must also include:
 - (1) the information contained in Items 2 through 5 of this Notice; and
 - (2) the number of persons needed for the Department to comment.

A request to the Department to comment should be addressed as follows:

Deputy Assistant Secretary
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210
Attn: 3001 Comment Request

COMMENTS TO THE INTERNAL REVENUE SERVICE

12. Comments submitted by you to EP Determinations must be in writing and received by them by December 28, 2020. However, if there are matters that you request the Department of Labor to comment upon on your behalf, and the Department declines, you may submit comments on these matters to EP Determinations to be received by them within 15 days from the time the Department notifies you that it will not comment on a particular matter, or by December 28, 2020, whichever is later, but not after January 12, 2021. A request to the Department to comment on your behalf must be received by it by November 28, 2020, if you wish to preserve your right to comment on a matter upon which the Department declines to comment, or December 8, 2020, if you wish to waive that right.

ADDITIONAL INFORMATION

13. Detailed instructions regarding the requirements for notification of interested parties may be found in Sections 19 and 20 of Rev. Proc. 2020-4. Additional information concerning this application (including, where applicable, an updated copy of the Plan and related trust; the application for determination; any additional documents dealing



with the application that have submitted to the Service; and copies of Sections 19 and 20 of Rev. Proc. 2020-4) are available at the Plan Administrator's address, listed in Item 6, during business hours for inspection and copying. You must list the information you are requesting, and you may be required to pay a nominal charge for copies and/or mailing of this information.