

## **SCHEDULE A**

### **RULES FOR IDENTIFYING DEATH MATCHES.**

In comparing Prudential Records against the DMF, the Company shall use the methodology below as the minimum standard for determining what constitutes a match. The Company shall use the same match rules for Annuity Contracts, Policies and Retained Asset Accounts.

**Category 1:** "Exact Social Security Number Match" occurs when the Social Security Number contained in the data found in the Company's records matches exactly to the Social Security Number contained in the DMF.

**Category 2:** "Non-Social Security Number Match" occurs in any of the following circumstances:

1. The Social Security Number contained in the data found in the Company's records matches in accordance with the Fuzzy Match Criteria listed below to the Social Security Number contained in the DMF, the First and Last Names match either exactly or in accordance with the Fuzzy Match Criteria listed below and the Date of Birth matches exactly.
2. The Company's records do not include a Social Security Number or where the Social Security Number is incomplete (less than 7 digits) or otherwise invalid (i.e. 11111111, 999999999, 123456789), and there is a First Name, Last Name, and Date of Birth combination in the data produced by the Company that is a match against the data contained in the DMF where the First and Last Names match either exactly or in accordance with the Fuzzy Match Criteria listed below and the Date of Birth matches exactly.
3. If there is more than one potentially matched individual returned as a result of the process

described in paragraphs 1 and 2, immediately above, then the Company shall run the Social Security Numbers obtained from the DMF for the potential matched individuals against Accurant for Insurance or an equivalent database. If a search of those databases shows that the Social Security Number is listed at the address in the Company's records for the insured, then a non-Social Security Number Match will be considered to have been made only for individuals with a matching address.

**Fuzzy Match Criteria:**

1. "First Name" fuzzy match includes one or more of the following:
  - a. "First Name" "Nick Names:" "JIM" and "JAMES." the Company utilizes the pd Nickname database from Peacock Data, Inc. or an equivalent database, to identify matching First Names where a nickname is used on one or both sides of the match.
  - b. "Initial" instead of full first name: "J FOX" and "JAMES FOX"
  - c. Data entry mistakes with a maximum difference of one character with at least five characters in length: "HARRIETTA" and "HARRIETA"
  - d. If First Name is provided together with Last Name in a "Full Name" format and "First Name" and "Last Name" can't be reliably distinguished from one another: "ROBERT JOSEPH," \_ Both "JOSEPH ROBERT" and "ROBERT JOSEPH"
  - e. Use of interchanged "First Name" and "Middle Name:": "ALBERT E GILBERT" and "EARL A GILBERT"
  - f. Compound "First Name:": "SARAH JANE" and "SARAH," or "MARY ANN" and "MARY"
  
2. A "Last Name" fuzzy match includes one or more of the following:
  - a. Compound last name: "SMITH" and "SMITH-JONES"
  - b. Blank spaces in last name: "VON HAUSEN" and "VONHAUSEN"
  - c. Use of apostrophe or other punctuation characters in "Last Name:": "O'NEAL" and "ONEAL"

- d. Data entry mistakes with a maximum difference of one character for last name with at least eight characters in length: "MACHIARELLI" and "MACHIARELI"
3. "Date Of Birth" fuzzy match includes one of the following:
- a. Two dates with a maximum of one digit in difference: "03/27/1945" and "03/27/1946"
    - i. NOTE: "0312711949" and "03127/1950" are not a match under Rule 3(a)i.
    - ii. Only 1 entry mistake per full date is allowable: "03/2711945" and "03/28/1946" are not a match
  - b. Transposition of "Month" and "Date" portion of the "Date of Birth:" "05/11/1935" and "11/05/1935"
  - c. If The Company's systems do not contain a complete "Date of Birth," then a "Date of Birth" exact match will be found to exist where the data that is available on The Company's systems does not conflict with the data contained in the DMF. By way of example, if The Company's systems only contain a month and year of birth, an exact "Date of Birth" match will exist if the DMF record contains the same month and year of birth.
4. "Social Security Number" fuzzy match includes one of the following:
- a. Two Social Security Numbers with a maximum of two digits in difference, any number position: "123456789" and "123466781"
  - b. Two consecutive numbers are transposed: "123456789" and "123457689"
  - c. If a Social Security Number is less than nine digits in length (with a minimum of seven digits) and is entirely embedded within the other Social Security Number: "12345678" and "012345678."

## **SCHEDULE B**

The Company's implementation of Business Reforms involving the frequency, and use of, the matching methodology described in Schedule A, shall proceed in the following manner:

- (1)** No later than twelve calendar months following the Effective Date, the Company shall confirm to the Lead Departments that it has completed the process required to effectuate the matching methodology contained in Schedule A (the "Confirmation Date"). During this twelve calendar month period, the Company will continue matching its in-force individual life policies, individual annuity contracts, and group life policies for which it provides recordkeeping services against the DMF update file according to its existing procedures. At present, the following products are matched: (i) on an annual basis -- individual life policies, individual annuities in accumulation phase and group universal and group variable universal life insurance issued to employer and association groups; and (ii) on a monthly basis -- individual annuities in a payout phase, Group life term life insurance issued to employer and association groups for which it provides full recordkeeping services, Group variable universal life non- corporate, trust and business owned policies (COLI, TOLI and BOLI), as well as policies on waiver of premium and Retirement Services' payout annuities attributable to defined benefit plans, as well as its structured settlements. Currently, Prudential's matching criteria requires an exact SSN, DOB and Last Name.

If a match is attained, Prudential will continue to share the applicable Policyholder information among its various lines of business according to existing procedures of conducting quarterly cross-checks of confirmed deaths against its various lines of business. Thereafter, Prudential then conducts due diligence to locate the beneficiary or next of kin and initiates the claims process to confirm the insured or contract owner's death, including the obtainment of a death certificate. If the death and liability is confirmed and a beneficiary is not located, Prudential remits the death payment to the applicable state in accordance with state unclaimed property laws.

In addition to the above, during the twelve calendar month period following the Effective Date, Prudential will be receiving monthly reports identifying matches as part of the resolution of its multi-state unclaimed property audit.

- (2)** Commencing on the Confirmation Date, the Company shall begin using Schedule A's matching methodology to compare Prudential Records against the DMF update file on a quarterly basis and perform Thorough Searches on any matches obtained during this process. Once a match is attained, the Company will continue to share applicable Policyholder information among its various lines of business according to existing procedures of conducting quarterly cross-checks of confirmed deaths against its various lines of business. Thereafter, Prudential then conducts due diligence to locate the

beneficiary or next of kin and initiates the claims process to confirm the insured or contract owner's death, including the obtainment of a death certificate. If the death and liability is confirmed and a beneficiary is not located, Prudential remits the death payment to the applicable state in accordance with state unclaimed property laws.

In addition to the above, during the twelve calendar month period following the Confirmation Date, Prudential will be receiving monthly reports identifying matches as part of the resolution of its multi-state unclaimed property audit.

- (3)** At the end of the fourth quarter following the Confirmation Date, the Company shall use Schedule A's matching methodology to compare Prudential Records against the full DMF file and perform Thorough Searches on any matches obtained during this process.
- (4)** No later than thirteen calendar months following the Confirmation Date, the Company shall begin using Schedule A's matching methodology to compare Prudential Records against the DMF update file on a monthly basis and perform Thorough Searches on any matches obtained during this process.
- (5)** No later than twenty four calendar months following the Confirmation Date, the Company shall use Schedule A's matching methodology to compare Prudential Records against the full DMF file and perform Thorough Searches on any matches obtained during this process.