STATUTORY DECLARATION

PURSUANT TO SECTION 15A OF THE INSURANCE ACT 1978

UNUM LIFE INSURANCE COMPANY OF AMERICA (the "Company")

To the best of our knowledge and based upon due inquiries, the undersigned Directors of the Company **DO SOLEMNLY DECLARE THAT** the Company has, with respect to the financial year ended December 31, 2017

- a) complied with all requirements of the minimum criteria applicable to it, including the modifications under section 6C(1) of the Insurance Act 1978 (the "Act") issued by the Bermuda Monetary Authority (the "Authority") and
- complied with the minimum margin of solvency as at its financial year end according to the applicable laws and regulations in the State of Maine, the Company's principal place of business, subject to the Certificate of Good Standing issued by the Insurance regulatory authority of the State of Maine;
- c) been exempted from complying with the enhanced capital requirements under the Act; and
- d) observed such limitations, restrictions and/or conditions under which its licence is issued by the Authority.

SWORN by:

Lisa G. Iglesias Director at 1 Fountain Square Chattanooga, TN 37402 this / 9⁴⁴ day of April 2018

Michael Q. Simonds
Director
at
2211 Congress Street
Portland, Maine 04122
this / Street day of April 2018

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