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**TOPPAN MERRILL UPDATED DISCLOSURE REQUIREMENTS
AND SUMMARY PROSPECTUS FOR VARIABLE ANNUITY
AND VARIABLE LIFE INSURANCE CONTRACTS – RULE 498A**

Are you prepared to simplify critical disclosures to meet form revisions adopted in Rule 498A for investors in variable annuity and life insurance products?

On Wednesday, March 11, 2020, the Securities and Exchange Commission (SEC) adopted the long-awaited Variable Annuity and Variable Life Insurance Summary Prospectus rule (Rule 498A).

The rule, which becomes effective July 1, 2020, and form amendments are intended to help investors make informed investment decisions regarding variable annuity and variable life insurance contracts. The amendments modernize disclosures by using a layered disclosure approach designed to provide investors with key information relating to the contract's terms, benefits, and risks in a concise and more reader-friendly presentation. Attempting to adopt the methodology adopted by the long-standing Mutual Fund Summary Prospectus Rule 498, 498A provides regulations related to the access to more detailed information available online, with the ability to request additional materials either electronically or in paper format.

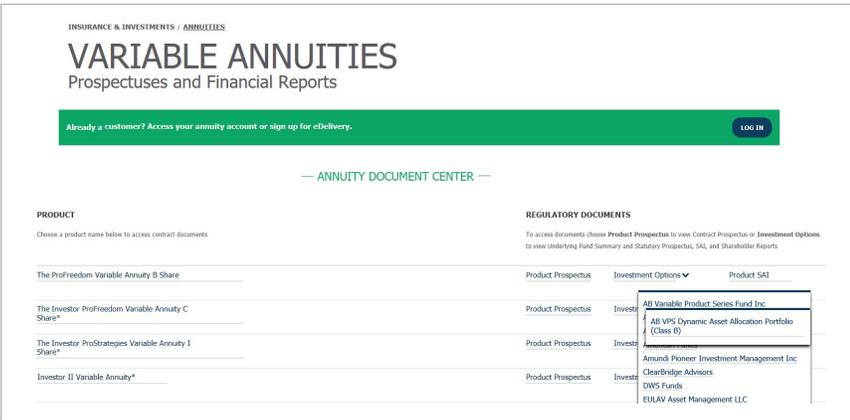
Whether you create, manage or distribute your documents using a full-service workflow or utilize a document automation system for your Annuity or Life products – We can Help.

TOPPAN MERRILL. Expand Possible.



Toppan Merrill's Publishing Center, supporting website document publishing since 2009, presents your entire document library in a single website location allowing you to easily manage your information. Intuitively designed linking and layering, variable product to underlying fund association, as well as customizable branding and functionality, provide a positive overall user experience. Publishing Center linking, layered disclosure, document accessibility, document navigation exceeds regulatory requirements for all past, present and anticipated future regulations, while enabling you to retain your corporate brand standards, as well as adhere to the Americans With Disability Act accessibility standards.

Company branded site provides investors easy, organized access to hosted compliance documents.



- Key Product Highlights:**
- Ensure Compliance – Automated document linking and layering, eliminating the need for manual input.
 - Improved Investor Experience – Automatically update and publish fully-branded documents.
 - Reduce Costs – No IT investments or additional staffing needed to develop or manage ongoing maintenance.

We also offer Document Composition, Typesetting, EDGAR, XBRL/iXBRL Tagging, Document & Communication Archiving, Offset and Digital Print, Electronic & Physical Distribution, Mailing and Fulfillment services.

With over fifty years' experience as a leading solutions provider for compliance and regulatory communications, Toppan Merrill can help support your communications strategy around Rule 498A or any other digital or print communication needs for your annuity or life products.

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