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May 9, 2022

Board of Directors
Sons of Norway
Minneapolis, Minnesota

We have audited, in accordance with auditing standards generally accepted in the United States of America, the statutory financial statements of Sons of Norway (the Society) as of and for the years ended December 31, 2021 and 2020, and have issued our report thereon dated May 9, 2022. In connection therewith, we advise you as follows:

1. We are independent certified public accountants with respect to the Society and conform to the standards of the accounting profession as contained in the Code of Professional Conduct and pronouncements of the American Institute of Certified Public Accountants, and the Rules of Professional Conduct of the Minnesota Board of Public Accountancy.
2. The engagement partner and engagement manager, who are certified public accountants, have 24 years and 17 years, respectively, of experience in public accounting and are experienced in auditing insurance entities. Members of the engagement team, most of whom have had experience in auditing insurance entities and 50% of whom are certified public accountants, were assigned to perform tasks commensurate with their training and experience.
3. We understand that the Society intends to file its audited statutory financial statements and our report thereon with the Minnesota Department of Commerce and other state insurance departments in states in which the Society is licensed and that the insurance commissioners of those states will be relying on that information in monitoring and regulating the statutory financial condition of the Society.

Although we understand that an objective of issuing a report on the statutory financial statements is to satisfy regulatory requirements, our audit was not planned to satisfy all objectives or responsibilities of insurance regulators. In this context, the Society and the insurance commissioners should understand that the objective of an audit of statutory financial statements in accordance with audit standards generally accepted in the United States of America is to form an opinion and issue a report on whether the statutory financial statements present fairly, in all material respects, the admitted assets, liabilities and surplus, as well as the results of operations and cash flows, in conformity with accounting practices prescribed or permitted by the Minnesota Department of Commerce.

Consequently, under auditing standards generally accepted in the United States of America, we have the responsibility, within the inherent limitations of the auditing process, to plan and perform our audit to obtain reasonable assurance about whether the statutory financial statements are free of material misstatement, whether caused by error or fraud, and to exercise due professional care in the conduct of the audit. The concept of selective testing of the data being audited, which involves judgment both as to the number of transactions to be audited and the areas to be tested, has been generally accepted as a valid and sufficient basis for an auditor to express an opinion on financial statements. Audit procedures that are effective for detecting errors, if they exist, may be ineffective for detecting misstatements resulting from fraud. Because of the characteristics of fraud, a properly planned and performed audit may not detect a material misstatement resulting from fraud. In addition, an audit does not address the possibility that material misstatements caused by error or fraud may occur in the future.

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Also, our use of professional judgment and the assessment of materiality for the purpose of our audit means that matters may exist that would have been assessed differently by insurance commissioners.

It is the responsibility of the management of the Society to adopt sound accounting policies, maintain an adequate and effective system of accounts, and establish and maintain internal control that will, among other things, provide reasonable but not absolute assurance that assets are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in conformity with accounting practices prescribed or permitted by the Minnesota Department of Commerce.

The Insurance Commissioner should exercise due diligence to obtain whatever other information may be necessary for the purpose of monitoring and regulating the statutory financial position of insurers and should not rely solely upon the independent auditor's report.

4. We will retain audit working papers (including those kept in a hard copy or electronic medium), prepared in compliance with professional standards, for seven years from the date that we grant permission to use our report in connection with the issuance of the Society's financial statements (report release date). After notification to the Society, we will make the audit working papers available for review by the Minnesota Department of Commerce or its delegates, at the offices of the insurer, at our offices, at the Minnesota Department of Commerce, or at any other reasonable place designated by the Insurance Commissioner. Furthermore, in the conduct of the aforementioned periodic review by the Minnesota Department of Commerce, photocopies of pertinent audit working papers may be made (under the control of the accountant) and such copies may be retained by the Minnesota Department of Commerce. In addition, to the extent requested, we may provide the Minnesota Department of Commerce with copies of certain of our audit working papers (such as unlocked electronic copies of Excel spreadsheets that do not contain password protection or encryption). As such, these audit working papers will be subject to potential modification by the Minnesota Department of Commerce or by others. We are not responsible for any modifications made to the copies, electronic or otherwise, after they are provided to the Minnesota Department of Commerce and we are likewise not responsible for any effect that any such modifications, whether intentional or not, might have on the process, substance or outcome of your regulatory examination.
5. The engagement partner has served in that capacity with respect to the Society since 2019, is licensed by the Nebraska Board of Public Accountancy and is authorized to perform accounting services under mobility in Minnesota, and is a member in good standing of the American Institute of Certified Public Accountants.
6. To the best of our knowledge and belief, we are in compliance with the requirements of Section 7 of the National Association of Insurance Commissioners *Model Rule (Regulation) Requiring Annual Audited Financial Reports* regarding qualifications of independent certified public accountants.

This letter is intended solely for the information and use of the Minnesota Department of Commerce and other state insurance departments, and is not intended to be, and should not be, used by anyone other than these specified parties.

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