# **STATEMENT OF ADDITIONAL INFORMATION**

# TRANSAMERICA FREEDOM ELITE BUILDER II issued through WRL Series Life Account by Transamerica Life Insurance Company

# Administrative Office: 6400 C Street SW Cedar Rapids, IA 52499

Please direct transactions, claim forms, payments and other correspondence and notices as follows:

Transaction Type	Direct or Send to
Telephonic Transaction	1-727-299-1800 or 1-800-851-9777 (toll free)
Facsimile Transaction	1-727-299-1620
Electronic Transaction	tlic.transamerica.com/
Payments made by check	PO Box 429, Cedar Rapids IA 52406-0429 or
	6400 C St. SW, Cedar Rapids, Iowa 52499-0001
Claims, general correspondence, and notices	Mailing Address: 6400 C St. SW, Cedar Rapids, Iowa 52499-
	0001

This Statement of Additional Information ("SAI") expands upon subjects discussed in the current prospectus for the Transamerica Freedom Elite Builder II flexible premium variable life insurance policy offered by Transamerica Life Insurance Company ("TLIC" or "Transamerica"). You may obtain a copy of the prospectus dated May 1, 2025, by calling our administrative office at 1-800-851-9777 (Monday – Friday from 7:00 a.m. – 6:00 p.m. Central Time), or by writing us at our mailing address at Transamerica, 6400 C St. SW, Cedar Rapids, IA 52499-0001. The prospectus sets forth information that a prospective investor should know before investing in a Policy. Terms used in this SAI have the same meanings as in the prospectus for the Policy. **NOTE: This product is no longer available for new sales.** 

This SAI is not a prospectus and should be read only in conjunction with the prospectuses for the Policy.

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In order to supplement the description in the prospectus, the following provides additional information about Transamerica and the Policy, which may be of interest to a prospective purchaser.

# TRANSAMERICA AND THE SEPARATE ACCOUNT

Transamerica Life Insurance Company was incorporated under the laws of the State of Iowa on April 19, 1961 as NN Investors Life Insurance Company, Inc, and is licensed in all states (except New York) and the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands. We are a wholly owned indirect subsidiary of Transamerica Corporation which conducts its business through subsidiary companies engaged primarily in the business of investment, insurance, and retirement solutions. All of the stock of Transamerica Corporation is indirectly owned by Aegon Ltd., the securities of which are publicly traded. Aegon Ltd., a holding company, conducts its business through subsidiary companies engaged primarily in the insurance business.

Transamerica established the separate account as a separate investment account under Ohio law in 1985 and the separate account was re-domesticated to Iowa in 2014. We own the assets in the separate account and are obligated to pay all benefits under the Policies. The separate account is used to support other life insurance policies of Transamerica, as well as for other purposes permitted by law. The separate account is registered with the SEC as a unit investment trust under the 1940 Act and qualifies as a "separate account" within the meaning of the federal securities laws.

Transamerica holds the assets of the separate account physically segregated and apart from the general account. Transamerica maintains records of all purchases and sales of portfolio shares by each of the subaccounts. A blanket bond was issued to AEGON USA, Inc. ("AEGON USA") in the aggregate amount of \$12 million, covering all of the employees of AEGON USA and its affiliates, including Transamerica. A \$5 million fidelity bond with additional capacity of \$20 million covers the activities of the registered representatives of Transamerica Capital, LLC.. ("TCL").

# **NON-PRINCIPAL RISKS OF INVESTING IN THE POLICY**

## CYBER SECURITY (Continued From "Principal Risks" Section Of The Prospectus")

#### **OPPORTUNITIES and CHALLENGES**

The increasing digitalization of the financial services landscape has intensified the financial and reputational risk presented by cybersecurity threats. As our business becomes more technology driven and our digital reliance increases, we become a greater target for cybercriminals, and more vulnerable to threats such as ransomware attacks.

#### What Transamerica is doing

Transamerica maintains a well-documented information security program which is based on ISO 27000 series and incorporates aspects of COBIT, NIST, SANS, as well as other industry-recognized frameworks and standards. The program is designed to protect the infrastructure, information systems, and the information in Transamerica's systems from unauthorized access, use, or other malicious acts by enabling the organization to identify risks, implement appropriate protections, and detect and respond to cybersecurity events. Transamerica has established strong security policies, procedures, guidelines, and standards that are reviewed regularly to for compliance with applicable laws, regulations, and alignment with industry standards. Our cybersecurity program covers aspects of security management: data handling and classification; access controls and identity management; business continuity and disaster recovery; configuration management; asset management; risk assessment; data disposal; information security incident response; system operations; vulnerability and patch management; system, application, and network security and monitoring; systems and application development and performance; physical and environmental controls; data privacy; vendor and third- party service provider management; consistent use of multi-factor authentication; cybersecurity awareness training; and encryption.

We continue to take steps to strengthen our information security program, infrastructure, and ability to respond to cyberattacks, for example, by further developing our Information Security teams and strengthening controls. Transamerica's Risk Management teams also periodically assess known potential cyber risk factors, together with the first line functions such as the Security Operations Center, with known trends or material incidents reported to Transamerica's Management and Supervisory Boards as necessary.

#### **OVERVIEW**

#### Information security and privacy regulation

Transamerica's businesses are regulated with respect to information security, data breach response, privacy, and data use at both the federal and state levels. At the federal level, various Transamerica companies are subject to the Gramm-Leach-Bliley Act

(GLBA), the Fair Credit Reporting Act (FCRA), and the Health Insurance Portability and Accountability Act (HIPAA), among other laws. At the state level, Departments of Insurance and Financial Services typically administer a series of privacy and information security laws and regulations that impact several Transamerica businesses such as the New York Department of Financial Services Rule 500 (NYDFS Rule 500). NYDFS amended its Part 500 Cybersecurity Rules to adopt heightened information security requirements in relation to areas such as cybersecurity governance, cybersecurity risk assessments, and incident reporting. In addition, in recent years numerous state legislatures have passed or have attempted to pass additional, more broad-based general consumer privacy laws, such as the California Consumer Privacy Act. Additional laws and regulations with respect to these topics are also anticipated to be promulgated and to go into effect in the coming years, and they may be administered by new or different state agencies or by the offices of state Attorneys General. The White House, SEC, and other regulators have also increased their focus on companies' cybersecurity vulnerabilities and risks, including in relation to third-party service providers. The SEC adopted the Cybersecurity Risk Management, Strategy, Governance, and Incident Disclosure by Public Companies in 2023 (the "Rule"). The Rule enhances and standardizes disclosures for public companies with regards to their cybersecurity risk strategy, management, and governance. The Rule also requires the reporting of a cybersecurity incident within four business days of determining that an incident is deemed material. In 2024, the SEC also amended Regulation S-P, the implementing regulation for GLBA applicable to brokerdealers, investment companies, registered investment advisers, and transfer agents. The Amendments include new requirements related to incident response programs, customer notifications of data breaches, service provider oversight, and other related matters. In September 2024, the Department of Labor (DOL) released an update to its 2021 cybersecurity guidance for plan sponsors, fiduciaries, recordkeepers and plan participants. This guidance has now been updated to confirm that the agency's 2021 guidance generally applies to ERISA-covered employee benefit plans, including health and welfare plans.

#### **Operational Risks**

# A computer system failure or security breach of Transamerica's IT systems or that of critical third parties may disrupt Transamerica's business, damage Transamerica's reputation and adversely affect Transamerica's results of operations, financial condition, and cash flows.

Transamerica relies heavily on computer and information systems and internet and network connectivity (collectively, "IT systems") to conduct a large portion of its business operations. This includes the need to securely store, process, transmit and dispose of confidential information, including personal information, through a number of complex systems. In many cases this also includes transmission and processing to or through customers, business partners, (semi-) governmental agencies and third-party service providers. Computer system failures, cyber-crime attacks or security or data privacy breaches may materially disrupt Transamerica's business operations, damage Transamerica's reputation, result in regulatory and litigation exposure, investigation and remediation costs, and materially and adversely affect Transamerica's results of operations, financial condition and cash flows.

The information security risk that Transamerica faces includes the risk of malicious outside forces using public networks and other methods, including social engineering and the exploitation of targeted offline processes, to attack Transamerica's systems and information and potentially demand ransom. It also includes inside threats, both malicious and accidental. For example, human error, bugs and vulnerabilities that may exist in Transamerica's systems or software, unauthorized user activity and lack of sufficiently automated processing or sufficient logging and monitoring can result in improper information exposure or failure or delayed detection of such activity in a timely manner. Transamerica also faces risk in this area due to its reliance in many cases on third-party systems, any of which may face cyber and information security risks of their own. Third-party administrators or distribution partners used by Transamerica or its subsidiaries may not adequately secure their own IT systems or may not adequately keep pace with the dynamic changes in this area. Potential bad actors that target Transamerica and applicable third parties may include, but are not limited to, criminal organizations, foreign government bodies, political factions, and others.

In recent years, information security risk has increased sharply due to a number of developments in how information systems are used, not only by companies such as Transamerica, but also by society in general. Threats have increased in frequency and magnitude, and are expected to continue to increase, as criminals and other bad actors become more organized and employ more sophisticated techniques. At the same time companies increasingly make information systems and data available through the internet, mobile devices or other network connections to customers, employees and business partners, thereby expanding the attack surface that bad actors can potentially exploit. Transamerica also faces increased cybersecurity risks due to the number of Transamerica's and Transamerica's service providers' and partners' employees who are working remotely, which creates additional opportunities for cybercriminals to launch social engineering attacks and exploit vulnerabilities in non-corporate IT environments. The White House, SEC and other regulators have also increased their focus on cybersecurity vulnerabilities and risks.

Large financial institutions such as and including Transamerica have been, and will continue to be, subject to information security attacks. The nature of these attacks will also continue to be unpredictable, and in many cases, may arise from circumstances that are beyond Transamerica's control. Attackers are also increasingly using tools and techniques that are specifically designed to circumvent controls, to evade detection and even to remove or obfuscate forensic evidence. As a result, Transamerica may be unable to timely or effectively detect, identify, contain, investigate or remediate IT systems in response to future cyberattacks. Especially if and to the extent Transamerica fails to adequately invest in defensive infrastructure, timely response capabilities, technology, controls and processes, or to effectively execute against its information security strategy, it may suffer material adverse consequences.

Transamerica maintains cyber liability insurance to help decrease the financial impact of cyber-attacks and information security events, subject to the terms and conditions of the policy; however, such insurance may not be sufficient to cover applicable losses that Transamerica may suffer.

# A breach of data privacy or security obligations may disrupt Transamerica's business, damage Transamerica's reputation and adversely affect financial conditions and results of operations.

Pursuant to applicable laws, various government and semi-governmental and other administrative bodies have established numerous rules protecting the privacy and security of personal information and other confidential or sensitive information held by Transamerica. Notably, certain of Transamerica's businesses are subject to laws and regulations enacted by US federal and state governments and/or various regulatory organizations relating to the privacy and/or information security of the information of customers, employees or others.

Numerous other legislators and regulators with jurisdiction over Transamerica's businesses are considering or have already enacted enhanced information security risk management and privacy laws and regulations, with the overall number and scope of such laws and regulations continuing to increase year over year. A number of Transamerica companies are also subject to contractual restrictions with respect to the use and handling of the sensitive information of Transamerica's clients and business partners.

Transamerica, and its employees, third-party providers and business partners have access to, and routinely process, the personal information of consumers and employees. Transamerica relies on a large number of processes and controls to protect the confidentiality, integrity and availability of personal information and other confidential information that is accessible to, or in the possession of, Transamerica, its systems, employees and business partners. It is possible that Transamerica or its third parties could, intentionally or unintentionally, inappropriately disclose or misuse personal or confidential information. Transamerica's data or data in its possession could also be the subject of an unauthorized information security attack. If Transamerica fails to maintain adequate processes and controls or if Transamerica or its business partners fail to comply with relevant laws and regulations, policies and procedures, misappropriation or intentional or unintentional inappropriate disclosure or misuse of personal information or other confidential information could occur. Such control inadequacies or non-compliance could cause disrupted operations and misstated or unreliable financial data, materially damage Transamerica's reputation or lead to increased regulatory scrutiny or civil or criminal penalties or (class action) litigation, which, in turn, could have a material adverse effect on Transamerica's business, financial condition and results of operations.

In addition, Transamerica analyzes personal information and customer data to better manage its business, subject to applicable laws and regulations and other restrictions. It is possible that additional regulatory or other restrictions regarding the use of such information may be imposed. Additional privacy and information security obligations have been imposed by various governments with jurisdiction over Transamerica or its subsidiaries in recent years, and more similar obligations are likely to be imposed in the near future across Transamerica's operations. Such restrictions and obligations could have material impacts on Transamerica's business, financial conditions and results of operations.

In order to supplement the description in the prospectus, the following provides additional information about us and the policy, which may be of interest to a prospective purchaser.

# THE POLICY – GENERAL PROVISIONS

#### **OWNERSHIP RIGHTS**

The Policy belongs to the owner named in the application. The owner may exercise all of the rights and options described in the Policy. The owner is the insured unless the application specifies a different person as the insured. If the owner dies before the insured and no contingent owner is named, then ownership of the Policy will pass to the owner's estate. The owner may exercise certain rights described below.

#### Changing the Owner

- Change the owner by providing written notice, in good order, to us at our mailing address at any time while the insured is alive and the Policy is in force.
- Change is effective as of the date that the written notice is accepted by us, in good order, at our mailing address.
- Changing the owner does not automatically change the beneficiary.
- Changing the owner may have tax consequences. You should consult a tax professional before changing the owner.
- We are not liable for payments we made before we received the written notice at our mailing address.

Choosing the Beneficiary	<ul> <li>The owner designates the beneficiary (the person to receive the death benefit when the insured dies) in the application.</li> <li>If the owner designates more than one beneficiary, then each beneficiary shares equally in any death benefit proceeds unless the beneficiary designation states otherwise.</li> <li>If the beneficiary dies before the insured, then any contingent beneficiary becomes the beneficiary.</li> <li>If both the beneficiary and contingent beneficiary die before the insured, then the death benefit will be paid to the owner or the owner's estate upon the insured's death.</li> </ul>
Changing the Beneficiary	<ul> <li>The owner changes the beneficiary by providing written notice to us, in good order, at our mailing address.</li> <li>Change is effective as of the date the owner signs the written notice.</li> <li>We are not liable for any payments we made before we received the written notice at our mailing address.</li> </ul>
Assigning the Policy	<ul> <li>The owner may assign Policy rights while the insured is alive.</li> <li>The owner retains any ownership rights that are not assigned.</li> <li>Assignee may not change the owner or the beneficiary, and may not elect or change an optional method of payment. Any amount payable to the assignee will be paid in a lump sum.</li> <li>Claims under any assignment are subject to proof of interest and the extent of the assignment.</li> <li>We are not: <ul> <li>bound by any assignment unless we receive a written notice of the assignment at our mailing address;</li> <li>responsible for the validity of any assignment;</li> <li>liable for any payment we made before we received written notice of the assignment at our mailing address; or</li> <li>bound by any assignment which results in adverse tax consequences to the owner, insured(s) or beneficiary (ies).</li> </ul> </li> <li>Assigning the Policy may have tax consequences. You should consult a tax professional before assigning the Policy.</li> </ul>
Selecting the tax test	• The owner may elect either the guideline premium test or the cash value accumulation test. Your election may affect the amount of the death benefit payable under your Policy, the amount of premiums you may pay, and the amount of your monthly deduction.

#### OUR RIGHT TO CONTEST THE POLICY

In issuing the Policy, we rely on all statements made by or for the insured in the application or in a supplemental application. Therefore, if you make any material misrepresentation of a fact in the application (or any supplemental application), then we may contest the Policy's validity or may resist a claim under the Policy for two years from the Policy date. For any portion of the specified amount that is issued as a result of a conversion, the contestability period is measured from the later of the Policy date of the Policy that was converted or the latest effective date of reinstatement of the converted Policy.

A new two year contestability period shall apply to each increase in specified amount that requires evidence of insurability (excluding automatic increases generated by the Inflation Fighter Rider Level Premium), beginning on the effective date of each increase and will apply only to statements made in the application for the increase.

In the absence of fraud, we cannot bring any legal action to contest the validity of the Policy after the Policy or requested increase that requires evidence of insurability, has been in force during the insured's lifetime for two years from the Policy date, or if reinstated, for two years from the date of reinstatement.

#### **Suicide Exclusion**

If the insured commits suicide, while sane or insane, within two years of the Policy date (or two years from the reinstatement date, if the Policy lapses and is reinstated), the Policy will terminate and our liability is limited to an amount equal to the premiums paid, less any outstanding loan amount, and less any cash withdrawals. We will pay this amount to the beneficiary in one sum. For any portion of the specified amount that is issued as a result of a conversion, the suicide period is measured from the later of the Policy

date of the Policy that was converted or the latest effective date of reinstatement of the converted Policy.

If the insured commits suicide, while sane or insane, within two years from the effective date of any increase in specified amount that requires evidence of insurability, our liability with respect to such increase will be limited to its cost of insurance charges and any per unit charges.

#### Misstatement of Age or Gender

If the age or gender of the insured was stated incorrectly in the application or any supplemental application, then the death benefit will be adjusted based on what the cost of insurance charge and per unit charge for the most recent monthly deduction would have purchased based on the insured's correct age and gender.

#### **MODIFYING THE POLICY**

Only our President or Secretary may modify the Policy or waive any of our rights or requirements under the Policy. Any modification or waiver must be in writing. No agent may bind us by making any promise not contained in the Policy.

If we modify the Policy, we will provide you notice and we will make appropriate endorsements to the Policy.

#### MIXED AND SHARED FUNDING

The underlying fund portfolios may serve as investment vehicles for variable life insurance policies, variable annuity contracts and retirement plans ("mixed funding") and shares of the underlying fund portfolios also may be sold to separate accounts of other insurance companies ("shared funding"). While the Company currently does not foresee any disadvantages to owners and participants arising from either mixed or shared funding, it is possible that the interests of owners of various contracts and/or participants in various plans for which the underlying fund portfolios serve as investments might at some time be in conflict. The Company and each underlying fund portfolio's Board of Directors intend to monitor events in order to identify any material conflicts and to determine what action, if any, to take. Such action could include the sale of underlying fund portfolio shares by one or more of the separate accounts, which could have adverse consequences. Such action could also include a decision that separate underlying fund portfolios should be established for variable life and variable annuity separate accounts. In such an event, the Company would bear the attendant expenses, but owners and plan participants would no longer have the economies of scale resulting from a larger combined fund. Please read the prospectuses for the underlying fund portfolios, which discuss the underlying fund portfolios' risks regarding mixed and shared funding, as applicable.

#### ADDITION, DELETION, OR SUBSTITUTION OF PORTFOLIOS

We do not guarantee that each portfolio will always be available for investment through the Policy. We reserve the right, subject to compliance with applicable law, to add new portfolios, close existing portfolios, or substitute portfolio shares that are held by any subaccount for shares of a different portfolio. New or substitute portfolios may have different fees and expenses and their availability may be limited to certain classes of purchasers. We will only add, delete or substitute shares of another underlying fund portfolio (or of another open-end, registered investment company) if the shares of a portfolio are no longer available for investment, or if in our judgment further investment in any portfolio would become inappropriate in view of the purposes of the separate account. We will not add, delete or substitute any shares attributable to your interest in a subaccount without notice to you and prior approval of the SEC, to the extent required by the 1940 Act or other applicable law. We may also decide to purchase securities from other portfolios for the separate account. We reserve the right to transfer separate account assets to another separate account that we determine to be associated with the class of contracts to which the Policy belongs.

We also reserve the right to establish additional subaccounts of the separate account, each of which would invest in a new underlying fund portfolio, or in shares of another investment company, with specified investment objectives. We may establish new subaccounts when, in our sole discretion, marketing, tax or investment conditions warrant. We will make any new subaccounts available to existing owners on a basis we determine. We may also eliminate one or more subaccounts for the same reasons as stated above.

In the event of any such substitution or change, we may make such changes in this and other policies as may be necessary or appropriate to reflect such substitution or change. If we deem it to be in the best interests of persons having voting rights under the Policies, and when permitted by law, the separate account may be (1) operated as a management company under the 1940 Act, (2) deregistered under the 1940 Act in the event such registration is no longer required, (3) managed under the direction of a committee, or (4) combined with one or more other separate accounts, or subaccounts.

#### **DEATH BENEFIT**

To qualify as "life insurance" under the federal tax laws, the Policy must provide a minimum death benefit. The minimum death benefit will be determined as of the date of death of the insured. Under current federal tax law, either the "guideline premium" test or the "cash value accumulation" test may be used to determine whether the Policy qualifies as "life insurance" under the Internal Revenue Code.

The "guideline premium" test limits the premiums that may be paid for a contract and also limits the relationship between the cash value and the death benefit. The "cash value accumulation" test limits the relationship of the cash value and the death benefit. Specifically, by the terms of the contract, the cash surrender value of the contract cannot exceed at any time the net single premium for the death benefit, the endowment benefit, and any charges for any qualified additional benefits.

You must elect one of the tax tests at the time of application for the Policy. You may not change tests. You should consult a qualified tax professional in choosing between the "guideline premium" and the "cash value accumulation" tests and in choosing a death benefit option.

The policy has a guaranteed minimum death benefit which must be paid upon the death of the insured. The minimum death benefit is computed by multiplying the cash value as of the date of the insured's death by a limitation percentage for the insured's age. Under the cash value accumulation test, the cash value in this calculation is reduced by any applicable net single premium for riders that are qualified additional benefits before multiplying by the limitation percentage. The minimum death benefit factors will be adjusted to conform to any changes in federal tax laws.

# ADDITIONAL INFORMATION RELATED TO THE POLICY

#### LEGAL MATTERS

Brian G. Stallworth, Esquire, of Transamerica, has provided legal advice on certain matters in connection with the issuance and operation of the Policy.

#### VARIATIONS IN POLICY PROVISIONS

Certain provisions of the Policy may vary from the descriptions in the prospectus, depending on when and where the Policy was issued, in order to comply with different state laws. These variations may include differences in charges, or Policy features may be unavailable, or known by a different name. Please refer to your Policy; any variations will be included in your Policy or in riders or endorsements attached to your Policy.

#### PERSONALIZED ILLUSTRATIONS OF POLICY BENEFITS

In order to help you understand how your Policy values would vary over time under different sets of assumptions, we will provide you with certain personalized illustrations upon request. These will be based on the age and insurance risk characteristics of the insured persons under your Policy and such factors as the specified amount, death benefit option, premium payment amounts, and rates of return (within limits) that you request.

The illustrations are not a representation or guarantee of investment returns or cash value. You may request illustrations that reflect the expenses of the portfolios in which you intend to invest.

#### DISTRIBUTION OF THE POLICIES

#### We no longer offer the Policies to the public.

Transamerica Capital, LLC. ("TCL"), serves as principal underwriter for the Policies. TCL's home office is located at 1801 California Street, Suite 5200, Denver, Colorado 80202. TCL is an affiliate of Transamerica and, like Transamerica, is an indirect, wholly owned subsidiary of AEGON USA. TCL is registered as a broker-dealer with the Securities and Exchange Commission under the Securities Exchange Act of 1934 and is a member of Financial Industry Regulatory Authority ("FINRA"). TCL is not a member of the Securities Investor Protection Corporation.

The Policies were offered to the public through sales representatives of broker-dealers ("selling firms") that have entered into selling agreements with us and with TCL. Sales representatives are appointed as our insurance agents.

During fiscal years 2024, 2023, and 2022, the amounts paid to TCL in connection with all Policies sold through the separate account were \$11,199,533.62, \$9,427,027.37, and \$9,666,980.65 respectively. TCL passes through to selling firms commissions it receives to selling firms for their sales, and does not retain any portion of any commissions. Our parent company provides paid-in capital to TCL and pays for TCL's operating and other expenses, including overhead, legal and accounting fees.

We and/or TCL or Transamerica Financial Advisors, LLC ("TFA") may pay certain selling firms additional cash amounts for: (1) "preferred product" treatment of the Policies in their marketing programs, which may include marketing services and increased access to their sales representatives; (2) sales promotions relating to the Policies; (3) costs associated with sales conferences and educational seminars for their sales representatives; and (4) other expenses incurred by them. These additional payments are not offered to all selling firms, and the terms of any particular agreement governing the payments may vary among selling firms. Differences in compensation paid to a selling firm or its sales representatives for selling one product over another may create conflicts of interests for such firms or its sales representatives.

# **REPORTS TO OWNERS**

At least once each year, or more often as required by law, we will mail to policyowners at their last known address a report showing the following information as of the end of the report period:

- > the current cash value
- > the current net surrender value
- > the current death benefit
- > outstanding loans

- > any activity since the last report
- > projected values
- > investment experience of each subaccount
- > any other information required by law

You may request additional copies of reports, but we may charge a fee for such additional copies. In addition, we will send written confirmations of any premium payments and other financial transactions you request including: changes in specified amount, changes in death benefit option, transfers, partial withdrawals, increases in loan amount, loan interest payments, loan repayments, lapses and reinstatements. We will also send copies of the annual and semi-annual report to shareholders for each portfolio in which you are indirectly invested.

#### Records

We will maintain all records relating to the separate account and the fixed account.

# **UNDERWRITERS**

# UNDERWRITING STANDARDS

The Policy uses mortality tables that distinguish between men and women. As a result, the Policy pays different benefits to men and women of the same age. Montana passed and signed Montana HB 379 on 4/19/2021 repealing the unisex requirement effective 1/1/2022. Prior to January 1, 2022, Montana prohibited our use of actuarial tables that distinguish between males and females to determine premiums and policy benefits for policies issued on the lives of its residents. Therefore, for policies issued in Montana prior to January 1, 2022, we based the premiums and benefits on actuarial tables that did not differentiate on the basis of gender.

Your cost of insurance charge is based on a number of factors, including, but not limited to, the insured's gender, issue age on the Policy date, issue age at the time of any increase in specified amount, specified amount band, length of time from the Policy date or from the date of any requested increase in specified amount, and underwriting class. We currently place insureds into the following underwriting classes:

- preferred elite;
- preferred plus;
- preferred;
- non-tobacco;
- preferred tobacco;
- tobacco; and
- juvenile under 18.

The preferred rate classes are not available for Policies issued with a specified amount at a level for which our underwriting requirements do not require a blood test. We also place insureds in various sub-standard underwriting classes, which involve a higher mortality risk and higher charges. We generally charge higher rates for insureds that use tobacco.

#### TRANSAMERICA'S PUBLISHED RATINGS

We may publish the ratings and other information that an independent ratings organization assigns to us, in advertisements, sales literature, or reports. These organizations include: A.M. Best Company, Moody's Investors Service, Inc., and S&P Global. These ratings are opinions regarding an operating insurance company's financial capacity to meet the obligations of its insurance policies in accordance with their terms. These ratings do not apply to the separate account, the subaccounts, the investment companies or their underlying portfolios, or to their performance. Ratings are subject to change.

# **INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM**

The statutory-basis financial statements and supplementary information of Transamerica Life Insurance Company at December 31, 2024, and for the year in the period ended December 31, 2024, incorporated by reference to the Form N-VPFS dated April 18, 2025, have been audited by Ernst & Young LLP, independent registered public accounting firm, as set forth in their report thereon incorporated by reference elsewhere herein, and are incorporated in reliance upon such report given on the authority of such firm as experts in accounting and auditing.

The financial statements of each of the subaccounts of WRL Series Life Account at December 31, 2024, and for the year in the period ended December 31, 2024, incorporated by reference to the Form N-VPFS dated April 18, 2025, have been audited by Ernst & Young LLP, independent registered public accounting firm, as set forth in their report thereon incorporated by reference elsewhere herein, and are incorporated in reliance upon such report given on the authority of such firm as experts in accounting and auditing.

The statutory-basis financial statements and supplementary information of Transamerica Life Insurance Company as of December 31, 2023 and for each of the two years in the period ended December 31, 2023, incorporated by reference to the Form N-VPFS dated April 18, 2025 have been so incorporated in reliance on the report of PricewaterhouseCoopers LLP, an independent registered public accounting firm, given on the authority of said firm as experts in auditing and accounting.

The financial statements of each of the subaccounts of WRL Series Life Account for the year ended December 31, 2023, incorporated by reference to the Form N-VPFS dated April 18, 2025 have been so incorporated in reliance on the report of PricewaterhouseCoopers LLP, an independent registered public accounting firm, given on the authority of said firm as experts in auditing and accounting

# FINANCIAL STATEMENTS

Transamerica's statutory-basis financial statements and schedules, which include the Report of Independent Registered Public Accounting Firm, should be distinguished from the Separate Account's financial statements, and you should consider these statutory-basis financial statements and schedules only as bearing upon Transamerica's ability to meet its obligations under the Policies. You should not consider our statutory-basis financial statements and schedules as bearing upon the investment performance of the assets held in the separate account.

All required statutory financial statements are included in Part B of this Registration Statement. Required separate account financial statements for WRL Series Life Account are incorporated by reference to <u>N-VPFS</u> (811-4420) filed on April 18, 2025.