

Massachusetts Mutual Life Insurance Company
and affiliates, 1295 State Street, Springfield, MA 01111-0001

This Disclosure and Acknowledgment must be completed for Whole Life insurance policies with the LTCAccessSM Rider for:

- ***New applications—only required when Owner is not the Insured; and***
- ***Existing policies—required for all ownership changes where the new Owner is not the Insured.***

Name of Insured ("Insured"): _____

Name of Policy Owner ("Policy Owner"): _____

Policy Number (Provide for existing policies only): _____

Agreements and Signatures

The Undersigned Policy Owner and Insured expressly understand and agree as follows:

- 1. Important Information about LTCAccessSM Rider (the "Rider") Benefits:** Both the Insured and the Policy Owner may make claims for benefits under the Rider. All amounts payable under the Rider are payable to the Policy Owner. The Policy Owner acknowledges and agrees that Massachusetts Mutual Life Insurance Company ("MassMutual") may provide Policy information to the Insured related to the coverage available under the Rider.
- 2. Important Tax Information:**
 - a. The benefits provided by the Rider are intended to be excludable from federal gross income under Section 101(g) of the Internal Revenue Code (IRC), as amended. However to receive tax free treatment, IRC Section 101(g) requires that the payment of benefits be for costs incurred by the payee for qualified long-term care services. As such benefits provided by the Rider may be subject to federal income tax and reportable if the Policy Owner is not the Insured or the Insured's spouse.
 - b. The Rider is not intended to be a federally tax-qualified long-term care insurance contract under IRC Section 7702B. Therefore, the premiums payable for the LTCR do not qualify as long-term care insurance premiums and are not deductible from gross income for federal income tax purposes.
 - c. The benefits provided by the LTCR will not be tax-free under Section 101(g) if the Policy Owner who is not the Insured has an insurable interest with respect to the Insured by reason of the Insured being a director, officer or employee of the Policy Owner or by reason of the Insured being financially interested in any trade or business carried on by the Policy Owner.
 - d. If the Policy is owned by an irrevocable life insurance trust (or other non-insured party) there may be adverse estate tax consequences including the potential that the Policy death benefit will be includible in the Insured's estate. IRC Section 2036 requires inclusion of trust property within a person's estate if a person transfers that property to a trust and retains an interest for life in that property. If an explicit agreement exists for the trustee to use the benefits from the Policy to pay the costs incurred by the Insured, the Policy would be included in the Insured's estate. However even if no explicit agreement existed the Internal Revenue Service may still assert an interest was retained in the contract if the benefits were ultimately used to pay for the Insured's qualified long-term care services through distributions to the beneficiaries or otherwise.
 - e. The Undersigned further acknowledge and agree that (1) neither MassMutual nor any of its agents, employees or representatives are authorized to give legal or tax advice; (2) the Undersigned has not relied on any representations or advice of any of MassMutual's agents, employees or representatives with respect to any matter disclosed herein; and (3) prior to execution of this Agreement, Disclosure and Acknowledgment, the Undersigned has had the opportunity to consult with its own legal and/or tax professionals.

X _____
Signature of Policy Owner

Date

X _____
Signature of Insured

Date