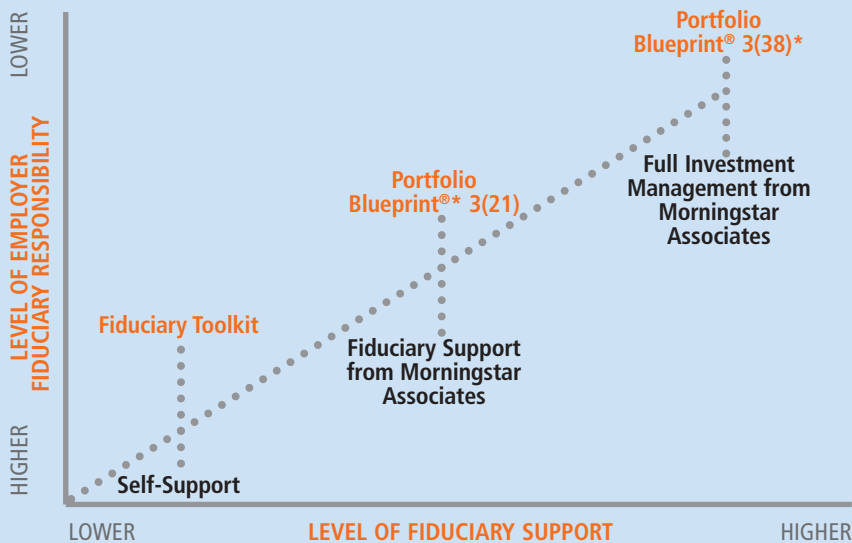


ING's Industry-Leading Fiduciary Solutions

Making it Easier to Manage your Fiduciary Responsibilities

Since 2003, ING has been a pioneer in providing forward-thinking solutions to employers, like you. As a result of today's demanding regulatory landscape, ING has expanded our continuum of fiduciary solutions to help you better understand and navigate your fiduciary responsibilities.

ING now offers you the most comprehensive level of fiduciary support possible under ERISA with Portfolio Blueprint® 3(38), through a strategic relationship with Morningstar Associates, LLC, a leading investment advisory firm and provider of employer support services.



A 3(38) arrangement represents the most comprehensive level of fiduciary support possible under ERISA. A 3(38) arrangement under ERISA removes the investment selection process and ongoing monitoring from the employer's responsibility to the 3(38) investment manager, in this case, Morningstar Associates.

For Employer Use Only



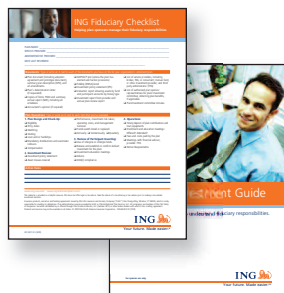
Your future. Made easier.®

Our solutions are tailored to your plan's specific needs while supporting your fiduciary responsibility.

ING's Fiduciary Toolkit:

For employers who just need a little guidance to understand and manage their fiduciary responsibilities. The Toolkit includes the following resources:

- **Fiduciary Investment Guide** – Provides you a framework for carrying out the fiduciary responsibilities associated with selecting and monitoring investments in your plan.
- **Sample Investment Policy Statement (IPS)** – Provides a framework for you to work with your legal counsel to craft an IPS that is tailored to your plan. The IPS defines how the investment options and managers are selected, monitored and evaluated.
- **Fiduciary Checklist** – Lists plan document and organizational requirements in an easy-to-use reference tool and helps assist you in your annual plan review.
- **ING Fund Evaluation Scorecard** – Offers a detailed investment option review to help you with the fund selection process.



Portfolio Blueprint® 3(21)

For employers who want a "Help Me Do It" solution, ING's flagship fiduciary service enables you to benefit from an independent, unbiased, professionally-developed fund menu and ongoing fund monitoring from Morningstar Associates for no additional fee, as well as acknowledgement of their fiduciary responsibility under ERISA 3(21)(A)(ii).

By using Portfolio Blueprint, the fiduciary is indemnified by Morningstar Associates in the event of a lawsuit with respect to the selection and monitoring of the plan's investment options. If, based on facts and circumstances, it is determined that the claim falls within the scope of indemnity, Morningstar Associates would:

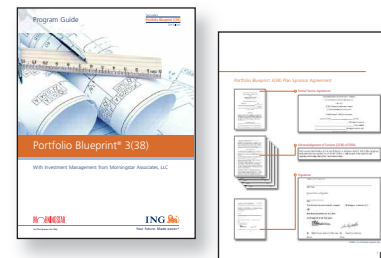
1. Select counsel to represent the fiduciary and Morningstar Associates
2. Pay the legal expenses of the fiduciary
3. Pay for damages awarded to the plaintiff



Portfolio Blueprint® 3(38)

For employers who don't have the time or expertise to manage plan investments, or for those who simply want the majority of investment risk off their desks and want a "Do It For Me" solution, this service removes your responsibility for investment selection and ongoing monitoring for an additional fee.

Hiring Morningstar Associates, a 3(38) investment manager, moves all investment decisions and ongoing monitoring from you to Morningstar Associates, helping to provide you with the most comprehensive level of fiduciary support possible under ERISA.



For more information on the solutions ING makes available to help you fulfill your plan's fiduciary obligations, contact your financial professional or local ING representative.

* Through a strategic relationship with Morningstar Associates, LLC, a registered investment advisor and wholly owned subsidiary of Morningstar, Inc., ING makes available Portfolio Blueprint®, a service offering investment management and fiduciary support from Morningstar Associates for plan sponsors. Morningstar Associates makes its fund selections from the fund platform that is available under the applicable ING product, which is a subset of the broad fund universe, and which consists of ING proprietary funds and unaffiliated funds that may have agreed to pay ING compensation in connection with sales of those funds and/or payments for services provided by ING or its affiliates on behalf of the funds. ING may at times request that Morningstar Associates reconsider specific fund selections but the final decision on which funds are selected for Portfolio Blueprint is Morningstar Associates'. Morningstar Associates has no ability to choose the funds that are made available under ING's products and contracts. The Morningstar name and logo are registered marks of Morningstar, Inc. All other logos and marks are the property of their respective owners.

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