

September 21, 2009

ING Investment Management is prepared to serve clients Pandemic/H1N1 Flu crisis management plan

ING Investment Management (ING IM) is committed to providing seamless, high quality service to our clients at all times. To address this year's Pandemic/H1N1 flu pandemic, ING IM's Crisis Management Organization has assembled a Pandemic Team, consistent with ING IM's standard operating procedure as part of our documented Crisis Management Plan. The pandemic team consists of senior leaders representing key areas of the firm that include: Human Resources, Compliance, Client Services, Information Technology, Facilities, Risk Management, Operations, Equity Investments, Fixed Income Investments and Proprietary Investments.

The Pandemic Team has been meeting regularly and has developed plans to address the H1N1 Flu. The team also sends regular communications to all employees about the plans, including business continuity, employee safety and precautions, and business travel, among other things.

All ING IM staff have been asked to update their business continuity plans, and critical functions have activated their plans when needed, with employee teams working remotely, at offsite locations, from home and third-party business recovery facilities, according to ING IM's pre-determined business continuity plans. While a handful of employees have had the flu, they have recovered and returned to work, and operations have continued without interruption. ING IM continues to monitor the situation closely.

Please refer to the following ING IM Pandemic /H1N1 responses for answers to frequently asked questions.

FAQs

How is ING Investment Management monitoring the current Influenza A (H1N1) virus situation, including health updates, government advice, emergency services, etc?

We review the World Health Organization (WHO) and Centers for Disease Control (CDC) websites for daily updates. Our pandemic planning team closely monitors several alert services that publish daily information and guidelines about pandemic issues. We have ongoing discussions with other peers in the industry on this topic and enhance our strategies based on best practices.

Describe how you have or will utilize your Business Continuity plans during a pandemic outbreak.

We have department-specific business continuity plans that address how we would function in the event of loss or unavailability of a facility, data center and/or staff. In the event of a pandemic flu outbreak, we would follow those plans as well as the measures described in #1 above. Additionally, we would, if necessary, implement social distancing and telecommuting arrangements.

What assumptions have you made, including peak levels of absenteeism, in your Business Continuity plans?

Our assumptions are that at any given time:

Up to 40% of staff may be affected

Staff may not be working due to illness or the need to care for family members who are ill

All sites are expected to be affected eventually, although they may be affected at different times

Routine supply and delivery chains are likely to be disrupted to some degree

Are you taking any steps to protect staff you have identified as key to your Business Continuity plans?

Yes, social distancing measures such as telecommuting will be implemented to the extent deemed necessary. For employees who must come to the work site, methods such as maintaining distance (as recommended by health authorities), split and alternate shifts will be used. We will also



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minimize or eliminate in-person meetings (depending on phase, severity and outbreak of the situation) by using teleconferencing. Daily cleaning of facilities with special emphasis on areas with suspected or confirmed cases has been put in place. Travel restrictions will be put in place as the situation dictates and as required by local authorities.

At what point in any pandemic do you invoke your Business Continuity plan?

There is an escalation plan based the following triggers:

Disease's severity in the community and/or ING IM

Extent of disease in the community

Amount of work absenteeism

School dismissals/Transportation issues

Do you expect to be able to continue to provide an acceptable level of service based on your planning assumptions?

Yes

Please contact your client service representative if you have any additional questions.