

MEMO

To: Distribution Partners and Producers

From: John Oberg, Director, ING Retail Life and Annuity Advertising Compliance

Date: July 2009

Re: **Annual Announcement: Advertising, Marketing and Sales Material Approval**

ING Retail Life and Annuity Advertising Compliance is focused on providing you with the best possible service and the highest quality marketing materials so you can build and retain your business. A part of that commitment is ensuring that all marketing materials which represent ING, its companies, products, and services comply with federal and state securities and insurance regulations, as well as company policy.

Please remember that all advertising and sales literature used in connection with the sale or service of ING companies' products, require **prior** approval by ING Retail Life and Annuity Advertising Compliance. This includes material that promotes the sale of retail General Account and Variable Universal Life insurance products, Fixed and Variable TSAs, as well as retail Variable Annuity and Retail Fixed Annuity product material.

Prior review and approval of all materials is required under all selling-agreements, agent and national marketing organization ("NMO") contracts and by company policy as is further explained in ING's Business Guidelines. Non-compliance can lead to termination.

Below are common questions and answers regarding this process:

Who does this affect? All personnel of and producers appointed with any of the following ING Companies: Security Life of Denver Insurance Company, ReliaStar Life Insurance Company, ReliaStar Life Insurance Company of New York, ING USA Annuity and Life Insurance Company and ING Life Insurance and Annuity Company (retail annuity materials only).

What do I need to submit? Advertising material is anything that is designed to create interest in our products and services that could induce the public to purchase, increase, modify, reinstate, borrow on, surrender, replace or retain a policy. Advertising materials include: but are not limited to:

- newspaper ads
- brochures
- business cards and stationery
- audio/visual materials
- training material (including "agent or employee use only" material created by 3rd party vendors)
- sales presentation in print or other media
- radio/TV spots
- seminars and PowerPoint presentations
- supplemental illustrations
- direct mail marketing material
- computer generated sales materials and
- web sites and microsites

Why should I submit material? Submission of all advertising and sales literature prior to use is Company policy. The policy needs to be followed in order to protect the Company, its customers and producers from materials that may be false, misleading or contain exaggerated statements or claims. Various regulatory agencies require prior approval to protect the public.

Where should I submit material? All materials, with the exception of business cards, web sites*, and Retail Fixed Annuity materials, should initially be submitted to the appropriate Marketing/Sales Promotion contact listed below. Retail Fixed Annuity materials should be submitted directly to Advertising Compliance in Des Moines at fixeddesignadreview@us.ing.com, using the Request for Review Form found on the ING for Professionals website.

Marketing/Sales contacts will review material to determine if a similar pre-approved piece exists. If not, your material will be reviewed for accuracy, ING branding guidelines (if applicable), and then forwarded to ING Retail Life and Annuity Advertising Compliance for review and, if approved, issuance of a control number. Your Marketing/Sales contact will keep you advised throughout the process regarding any required revisions and/or final approval. Your material cannot be used until you have received a formal approval and control number. Once your material has been approved and a control number has been issued it is your responsibility to retain a copy of the final approved version in your files. Advertising Compliance does not retain electronic versions of approved materials.

Marketing/Sales Promotion Contacts for product and concept material concerning:

- Retail General Account and Variable Universal Life products – Laurie.Bailey@us.ing.com
- Retail Variable Annuity products – Rita.Schorn@us.ing.com
- TSA products - ing.tsas@us.ing.com

Business cards ordered through ING sponsored online vendors will automatically be routed to the appropriate Advertising Compliance unit prior to printing. Web sites and independently printed business cards used in connection with the sale of ING life companies' products should be submitted to inglifecompanies.adreview@us.ing.com along with a completed Request for Review form.

If I am also a registered representative, do I still need to submit marketing material to my broker-dealer? Yes, you should continue to follow your broker-dealer's advertising and sales literature guidelines and/or policies. The broker/dealer may only require variable insurance product or other securities product information to be submitted (rather than material discussing only general account products or generic life insurance material).

A Special Note about Designations and Titles

Recent industry trends surrounding the use of designations (e.g. Senior Financial Specialist et al) and titles have come under increased regulatory scrutiny. Please refer to ING Pro for the list of approved designations that may be used (See Advertising Compliance Manual, Appendix E). If the designation you wish to use is not on the list please follow the procedure stated in Appendix E to submit the designation for review. Approved titles are limited to the following list:

- General Agent
- Insurance Agent
- Insurance Representative
- Insurance Professional
- Registered Representative
- Representative

For more information on Advertising Compliance login to the ING for Professionals (ING Pro) site at <https://www2.ing-usa.com/portal/public/login>, click on Compliance & Reference in the left-side navigation, then select Advertising Compliance. The Advertising Compliance section contains a great deal of information including guidance on creating compliant advertising and sales literature, policies and procedures, and frequently used disclosures.

If you have questions or would like to speak to an advertising compliance analyst, send an email to inglifecompanies.adreview@us.ing.com, or find the current listing of analysts in the Life section under the Contact Us tab on ING Pro.

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Life insurance products are issued by ReliaStar Life Insurance Company (Minneapolis, MN), ReliaStar Life Insurance Company of New York (Woodbury, NY) and Security Life of Denver Insurance Company (Denver, CO). Variable universal life insurance products are distributed by ING America Equities, Inc. Annuities are issued by ING USA Annuity and Life Insurance Company (Des Moines, IA), ReliaStar Life Insurance Company, ReliaStar Life Insurance Company of New York and ING Life Insurance and Annuity Company ("ILIAC", Windsor, CT). Variable annuities issued by ReliaStar Life Insurance Company are distributed by ING Financial Advisers, LLC (member SIPC). Variable annuities and registered fixed annuities issued by ING USA Annuity and Life Insurance Company, ReliaStar Life Insurance Company of New York and ILIAC are distributed by Directed Services LLC. Within the state of New York, only ReliaStar Life Insurance Company of New York and ILIAC are admitted, and their products issued. All are members of the ING family of companies.

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