

Andrea D'Aoust

From: Dan Mulheran [inglifecommunications@us.ing.com]
Sent: Thursday, November 05, 2009 6:18 PM
To: Andrea D'Aoust
Subject: ING Recent News - Some Perspective for You and Your Clients

ING Life Companies
StraightSpeak

STRAIGHTSPEAK WITH DAN MULHERAN

November 5, 2009



Daniel P. Mulheran
President, ING Life Distribution

To: Our Valued Distributors
From: Daniel P. Mulheran, LLIF, CLU, ChFC
President, ING Life Distribution
Date: November 5, 2009
Re: ING Recent News - Some Perspective for You and Your Clients

On October 26, 2009, ING Groep N.V. (ING) announced that it will move towards a complete separation of its global banking and insurance operations. This is part of our new strategy and the Back to Basics program we announced in April of this year. The plan is to complete this separation by 2013. All options will be explored and considered, including initial public offerings, outright sales or a combination thereof. The goal is to achieve the best possible outcome for all businesses and to continue to serve our millions of customers worldwide.

The announcement of this next step has caused a flurry of commentary from all corners. We know this has added to your uncertainty about what this all means for you and your customers. Now that the dust is settling, we want to answer the many questions we have been hearing from you. The most frequent questions, understandably, are surrounding our financial strength, credit ratings, and the uncertainty of the future.

Q You indicated recently that ING considered the life insurance business "core" to its future. Does this move mean the life business is not doing well?

- No. The U.S. Life insurance business has been consistently profitable, and in fact, growing profits consistently year over year. The U.S. Life business is on its way to another record year in earnings in 2009. 2008 was the U.S. Life business' all time record sales year. In order to fulfill the objectives of this new direction, it is in ING's best interest to support the continued growth of the insurance organization as a healthy, competitive business. Life insurance remains a core business to ING.

Q So then why has ING taken this step at this time?

- Historically, ING saw great value in a combined banking and insurance structure. The combination provided scale, capital efficiency and earnings stability. The global financial crisis has diminished these benefits. Separating our banking and insurance operations will help us meet the global demand for a simpler, more transparent organizational structure. Further, this strategy accelerates ING's plans to pay off the Dutch government for the hybrid securities that made up the capital infusion in November of 2008. This acceleration will result in a substantial discount from the original payback structure.

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What does all this mean for me and my clients today?

- Nothing about ING's fundamentals has changed from the week before this announcement. The financial strength and claims paying ability of the ING family of life companies is unchanged. Historically, objective analyses of these measures would result in a (AA) rating, or better. The U.S. Life Companies' composite Risk Based Capital (RBC) ratio at 12/31/08 was 377%, a regulatory capitalization ratio well above its targeted RBC ratio. In fact, ING's current RBC ratio is in-line with the historical equivalent of (AA) rated insurance companies noted earlier in this paragraph. So, from the standpoint of the fundamentals that should matter the most to you and your clients, the ING Life Companies are as strong as ever.
 - ING U.S. Insurance is one of the largest life insurers in the U.S. We will continue to offer a wide array of competitive, quality life insurance products. Your client's policies continue to be serviced by the same outstanding organization that was servicing them prior to Oct. 26. Our U.S. life insurance business continues to be headed by Butch Britton and his outstanding leadership team, and all the wonderful people you've come to depend on for top notch service.
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How, then, do you explain the most recent ratings downgrades you received?

- Moody's and Fitch downgraded ING's U.S. Insurance operating entities by one notch and assigned a negative outlook. S & P affirmed its current rating and assigned a negative outlook. We are disappointed in these actions as they contradict the soundness of our financial strength. Using historical, objective measures, our financial condition is in-line with the equivalent of (AA) rated insurance companies.
- In their announcements the past week, S & P and Fitch appear primarily concerned with ING's ability to effectively execute its new strategy. One only has to look at recent history to see examples of ING's skill at divestitures. Look at ING Canada. This company dominated the P & C business in Canada, but was no longer seen as a good strategic fit. An IPO for 30% of the company was very successful. Only a few years later, another IPO completed the divestiture. Today, the successor company has a new name and brand, is very successful and enjoys the same dominant position in the Canadian P & C market. More recently, ING has announced its intention to transition our group reinsurance business and, just this week, announced its intention to transition the ING Advisors Network broker dealers. ING has completed a number of other successful transactions around the world that have been a part of our Back to Basics strategy.
- The ING Life Companies' ratings as of 10/27/09 are all investment grade:

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| A.M. Best | A Excellent (3rd highest of its 15 categories) |
| S & P | A+ Strong (5th highest of its 20 categories) |
| Moody's | A2 Good (6th highest of its 21 categories) |
| Fitch | A- Strong (7th highest of its 19 categories) |

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So then, what does all this mean for me and my clients tomorrow?

- Whether we are talking today or tomorrow, the ING Life Companies have an unwavering commitment to your and your clients' futures. The guarantees within the life insurance products you sell are based on the financial strength and claims-paying ability of the issuing company, which is solely responsible for the obligations under its own policies.
- Consider other recent merger and acquisition activity in our industry - Jefferson Pilot/Lincoln Financial, Travelers/Met Life, Manulife/John Hancock. No one knows what brand name policies written today we will have tomorrow. But, whether it's ING or another name, there is no reason to think the value of your clients' insurance will be diminished.
- ING Insurance U.S. is part of ING's Global Insurance business that today ranks as the world's sixth-largest insurance enterprise* with leadership positions across the globe. The ING Insurance U.S. family of companies are well positioned to pursue their business strategy.

* Source: Datamonitor, Global Top 10 Insurance Companies - Industry, Financial and SWOT Analysis, 8/3/09

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When and where can we look for further communications?

- We will continue to provide you updates on progress with our new strategy, as well as product developments, underwriting initiatives and service enhancements. Please do not hesitate to contact your representative with questions

or for additional sales and marketing support. You are encouraged to review our distributor website (ING For Professionals) at www.inglifeinsurance.com for sales and product information that will be helpful with your clients, as well as analysts' summaries and other information regarding the latest ING news.

Thank you for your continued trust and confidence in ING.

LIFE



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A.M. Best Company assigns ratings from A++ to F based on a company's financial strength and ability to meet obligations to contract holders. A (Excellent) is the 3rd highest of 15 ratings. Fitch assigns ratings from AAA to C based on company's financial strength. A- is the 7th highest of 19 ratings. Moody's Investor Service (Moody's) assigns ratings from Aaa to C based on a company's financial security. A2 is the 6th highest of 21 ratings. Standard & Poor's assigns ratings from AAA to CC based on a company's financial security. A+ is the 5th highest of 20 ratings. Independent rating services evaluate insurance company financial strength. The ratings relate to an insurance company's ability to meet its claims and guarantees. The ratings do not apply to the safety or performance of any specific insurance product or any obligations of the variable investment option.

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