

High Net Worth

Foreign National Program And Guidelines

ING Insurance Americas

LIFE INSURANCE

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I. Overview

Foreign Nationals that spend time in the United States, have significant assets located in the United States, or have a significant connection to the United States may have a need for life insurance. Seeking to transfer wealth from one generation to the next is a common financial objective that applies to individuals and their families throughout the world. Life insurance benefits may be viable financial products to help in this process. The ING Life Insurance Companies¹ offer a high quality portfolio of life insurance products that may be suitable for the dynamic financial planning² needs of many wealthy foreign nationals³.

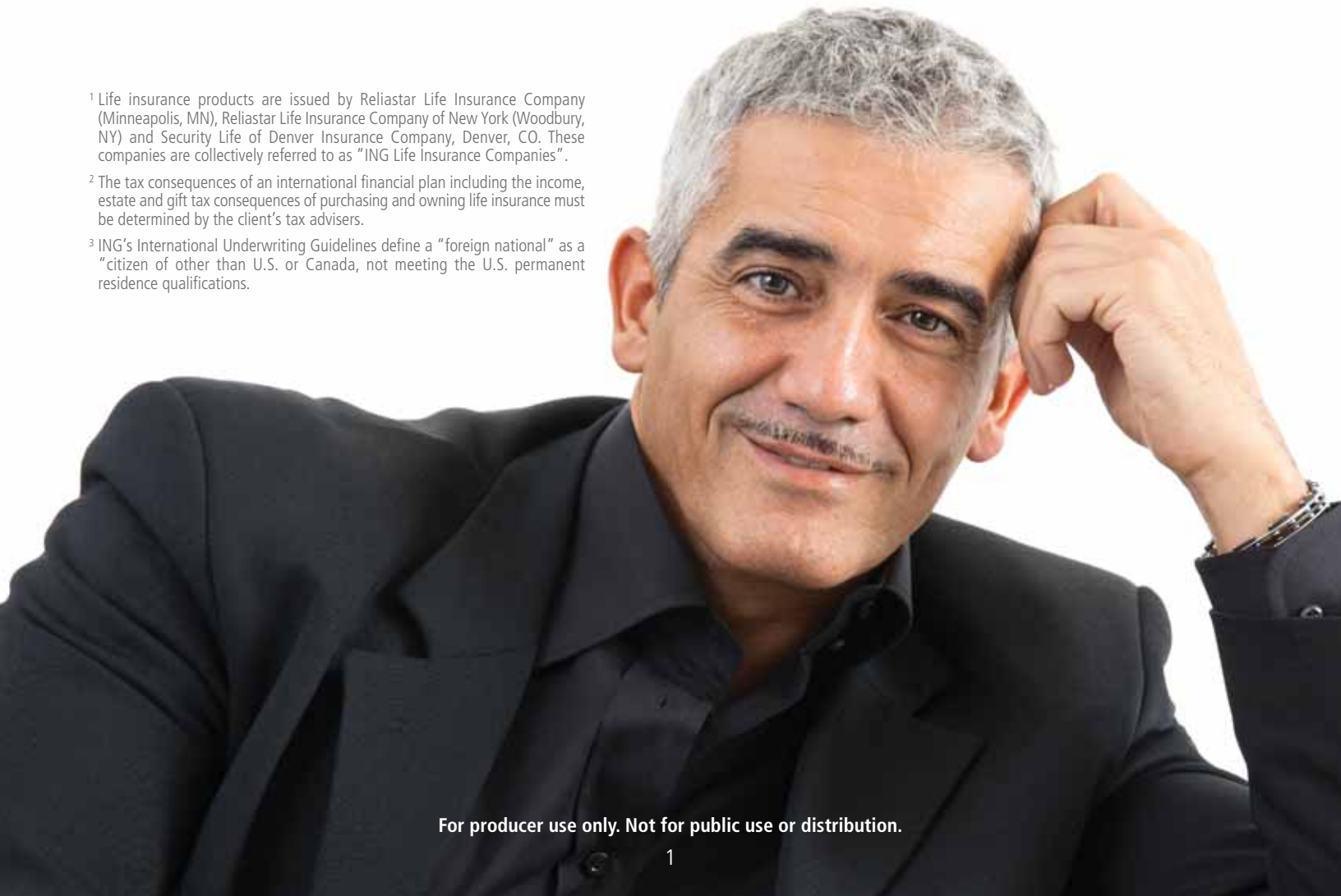
These guidelines will help you determine whether an individual prospect or proposed insured is eligible to participate in ING's High Net Worth Foreign National Program ("HNWFN Program") and whether they may be considered for coverage under ING's International Underwriting Guidelines. If you have any questions regarding these guidelines, please contact your ING regional representative or Individual Life HNWFN Underwriter.

These guidelines outline procedures established by ING for the solicitation, selling, underwriting, and servicing of ING Life Insurance Companies' policies insuring the lives of Foreign Nationals.

¹ 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. These companies are collectively referred to as "ING Life Insurance Companies".

² The tax consequences of an international financial plan including the income, estate and gift tax consequences of purchasing and owning life insurance must be determined by the client's tax advisers.

³ ING's International Underwriting Guidelines define a "foreign national" as a "citizen of other than U.S. or Canada, not meeting the U.S. permanent residence qualifications.



II. Producer Eligibility and Guidelines



A. Producer Qualification

1. General

ING Life Insurance Companies maintain the highest standards in working with producers in the complex HNWFN market. Selling in this market requires knowledge of customs, practices, procedures and laws of foreign countries, as well as a detailed understanding of ING's HNWFN Program including its underwriting guidelines. Time, effort and expense are all required for a producer to enter and be successful in this market. As discussed below, ING reviews the application of each producer seeking to participate in its HNWFN Program and reserves the right, in its absolute discretion, to determine which producers it will allow to participate.

2. Producer Qualification – HNWFN Distributor Qualification Questionnaire

Before a producer may access ING's International Underwriting capabilities, the agent must complete a HNWFN Distributor Qualification for ING executive approval. The questionnaire (shown in the appendix part A) requests data related to the producer that will be seeking access to ING's HNWFN US Program. Every individual who will be involved in the sales process must complete the Questionnaire. In addition, we ask questions about the target market of the producer including an estimate of written annualized premium by jurisdiction and product type. In light of the importance of handling solicitation of HNWFN sales, we ask the producer to detail how new business will be solicited. ING also needs to understand how the producer will comply with U.S. and foreign regulations regarding solicitation and placement of life insurance. ING also expects that all parties identified as potential participants in the program will have reviewed and agreed to abide by ING's Rules for Soliciting Sales to Foreign Nationals. The remainder of the questionnaire requires certain certifications related to the program and a listing of ING's Rules for Soliciting Sales to Foreign Nationals.

3. ING Business Guidelines

In addition to the guidelines applicable to the HNWFN program included within this document, all producers are expected to comply with the ING Life Companies' Business Guidelines. For more information please see the "Compliance" section on the ING for Professionals life insurance website (www.inglifeinsurance.com).

4. Certification

Producers participating in the program are required to certify certain information and agree to comply with the Program's Guidelines as well as acknowledge their understanding of its critical principles. The producer makes the certification by signing the Questionnaire. If the producer operates through an entity such as a corporation or limited liability company, that entity must also make the required certification. To do so, the Questionnaire must be signed by an officer of such entity with legal authority to bind the entity. By signing the certification on behalf of the entity, such entity legally recognizes that it is bound by the terms of the certification.

Initially, Producers must certify that all answers to the questionnaire are true and correct and to their understanding that the ING Life Insurance Companies are relying on the answers provided by the Producer. The Producer must agree not to take any action or engage in any conduct that contravenes or violates any rule, regulation or law. The Producer must also agree that it is his or her responsibility to ensure that all persons or entities identified on the questionnaire to participate in the HNWFN Program abide by all applicable United States and foreign laws and regulations. In this regard, foreign laws related to the

purchase of insurance products from a foreign or non-admitted insurer in that country may be very restrictive and may apply beyond the borders of such country or jurisdiction. Equally, the producer agrees that it would be a violation of ING's underwriting guidelines and ING's rules for soliciting sales to Foreign Nationals if he or she engages in any activity that would require the ING Life Insurance Companies to be licensed in any country or jurisdiction. The producer also agrees that the payment of compensation to any referral source in connection with the sale of a specific insurance product of the ING Life Insurance Companies may be limited or prohibited in certain foreign countries or jurisdictions. Finally, the certification reiterates the prohibition of marketing or solicitation in a foreign country or jurisdiction and imposes a notification obligation on the part of the producer for changes in any of the information provided. In addition, the producer must notify the ING Life Insurance Companies if he or she becomes aware of any violation of United States or foreign laws and regulations, violations of ING's underwriting guidelines or violations of ING's rules or soliciting sales to Foreign Nationals by any person or entities identified as participants in the HNWFN Program on the questionnaire. The certification required by the questionnaire is set forth below:

By signing below:

- ✓ I certify that the above answers are true and correct and understand that the ING Life Insurance Companies are relying on my answers.
- ✓ I agree that I will not take any action or engage in any conduct that contravenes any rule, regulation or law.
- ✓ I acknowledge that the Insurance Companies are unregistered, non-admitted foreign insurers in the foreign nationals' countries or jurisdictions of residence.
- ✓ I agree that it is my responsibility to abide by all U.S. and foreign laws and regulations including foreign laws concerning permissible activities in a foreign national's country or jurisdiction of residence. Foreign laws relating to the purchase of insurance products from a foreign or non-admitted insurer may be very restrictive and may even apply beyond the legal borders of such country or jurisdiction.
- ✓ I agree that any action taken that would require any of the Insurance Companies to be licensed or admitted in any such countries or jurisdictions constitutes a violation of ING's underwriting guidelines and ING's rules for soliciting sales to foreign nationals.
- ✓ I understand that the payment of compensation to any referral source in connection with the sale of a specific insurance product of the Insurance Companies may be prohibited in certain foreign countries or jurisdictions.
- ✓ I agree that the marketing or solicitation of the Insurance Companies products in any foreign national's country or jurisdiction of residence constitutes a violation of law, ING's underwriting guidelines and ING's rules for soliciting sales to foreign nationals.
- ✓ I understand that the Insurance Companies may take necessary disciplinary actions against me or any violation of U.S. or foreign laws and regulations, ING's underwriting guidelines or ING's rules for soliciting sales to foreign nationals.
- ✓ I agree that I will notify the Insurance Companies immediately if any of the answers given above are no longer correct, any changes, additions and deletions are necessary, or if I become aware of any violation of U.S. or foreign laws and regulations, ING's underwriting guidelines or ING's rules for soliciting sales to foreign nationals.
- ✓ I agree that if I solicit through an entity, I will also sign the form as an officer on behalf of such entity and by so doing, I understand that such entity certifies and agrees to each of the above terms and conditions. Such entity shall also be subject to and must abide by ING's Rules for Soliciting Sales to Foreign Nationals as described below.

B. Solicitation Guidelines

1. Requirements

It is the responsibility of the producer to be aware of local laws concerning permissible and impermissible activities in a client's country or jurisdiction of residence. Local laws relating to a resident's purchase of insurance products may be very restrictive, and may even apply beyond local borders.

Consequently, producers should consult an attorney for country-specific advice about permissible activities in the country or jurisdiction of residence of any prospective foreign insured and/or policy owner.

ING Life Insurance Companies' products must not be promoted through the use of cold calls, mailings, seminars, advertisements, or any other activities designed to create public interest in the product outside of the United States. Clients outside of the United States should be obtained through an appropriate referral and should contact the producer at the recommendation of an advisor. In most cases, it is expected that the advisor will be a professional such as an attorney or accountant or a private banker. Such individuals may make a referral to a producer in the United States in recognition that a life insurance policy issued in the United States may help a client in meeting their personal, business, retirement or wealth transfer objectives.

In all cases, no specific insurance products may be discussed in a client's country or jurisdiction of residence. A producer may only discuss the role of life insurance in meeting a client's financial objectives. A producer shall not conduct any client meetings, presentations, completion of applications and related forms, medical exams, field underwriting (including without limitation, evaluation of any change in insurability between the time of application and issuance of a policy) or policy delivery in the client's country of residence. All solicitation and communication (including marketing materials) concerning the sale of life insurance products, including all telephone, fax or other electronic or delivered correspondence, must take place in the United States. Solicitation and communication includes, but is not limited to, delivery of contracts, marketing materials or letters soliciting the purchase of insurance, meeting with clients to discuss life insurance or other similar prospecting type activity. As a reminder, a producer must deliver the policy to the policy owner in person in the state where the policy is issued.

Currently, the ING Life Insurance Companies only allow medical examinations by Life Insurance Companies' approved labs and examiners in the United States or Hong Kong. If an exam will be performed in Hong Kong, there are additional rules to follow. Please refer to the Hong Kong Procedure in the appendix.

2. ING's Rules for Soliciting Sales to Foreign Nationals

ING maintains strict rules on soliciting sales to Foreign Nationals. Most importantly, all solicitation of sales of ING Life Insurance Companies' products must occur in the United States. Furthermore, no written materials of any kind, in any way referring to ING Life Insurance Companies' products, may be sent or delivered outside of the United States. With limited exceptions, the owner/applicant of a policy must be a United States person or entity. In many cases, the client will set up a United States trust or a limited liability company to be the owner of a policy. In addition, all policies must be delivered in person to the applicant/owner in the United States in the state where the policy is to be issued.

Likewise, all premium payments must be in United States dollars from a United States bank. Finally, ING's Rules set forth strict guidelines regarding solicitation and referrals. With regard to solicitation, ING's Rules require strict compliance with local laws related to solicitation in the insured's country of residence. The ING Life Insurance Companies are not licensed or admitted as an insurer in such jurisdictions, and any activity that would cause such companies to be required to be licensed or admitted in such countries or jurisdictions is strictly prohibited. The ING Rule For Soliciting Sales to Foreign Nationals as it appears in the HNWFN Distributor Questionnaire is set forth below:

ING'S Rules For Soliciting Sales To Foreign Nationals

- ✓ All solicitation of life insurance sales policies shall occur in the U.S.
- ✓ No written materials of ING or referring in any way to ING shall be brought to or delivered in the home jurisdiction of any insured.
- ✓ No mention of ING, or any ING U.S. life insurance company or any ING U.S. life insurance product shall be made to an insured in that insured's home jurisdiction.
- ✓ Except as agreed to by ING as part of its HNWFN Non-U.S. ownership program, all policies shall have a U.S. application/owner (e.g. a trust or limited liability company) with a U.S. address.
- ✓ All premiums shall be paid in U.S. dollars from a U.S. bank.
- ✓ All policies shall be delivered to the applicant/owner in the U.S.
- ✓ Observe and maintain strict compliance with all local law requirements prohibiting the entity or person and the ING U.S. life insurance companies from soliciting any insurance business in the foreign national's home jurisdiction as an unlicensed agent or unregistered or non-admitted insurer. Solicitation of life insurance in the foreign national's home jurisdiction includes, but is not limited to, delivery of prospectuses or life insurance contracts, marketing materials or letters soliciting the purchase of ING life insurance products, meeting with the foreign national to discuss ING U.S. life insurance products or other similar prospecting type activities or the payment of compensation to a referral source in connection with the sale of a specific ING life insurance product.
- ✓ No referral may be obtained from a locally licensed individual life insurance agent.
- ✓ No mention or identification of ING, ING U.S. life insurance companies or ING U.S. life insurance products is to be made by any referral source or any party present during any meeting to discuss the role that life insurance can play in helping the foreign national meet their financial objectives.





3. Referral Guidelines

Regarding referrals, ING Life Insurance Companies strictly prohibit the payment of any compensation by, or on behalf of, ING Group and its affiliates, including the ING Life Insurance Companies, to any person in the country or jurisdiction of residence of the insured, for referring such individual to the producer for the purchase of insurance products offered by the ING Life Insurance Companies. Strict adherence to the referral guidelines set forth in the HNWFN Distributor Questionnaire is required. Many producers participating in ING's HNWFN Program rely on referrals from financial professionals. It should be noted that no referral may be obtained from an individual or entity that is licensed as an insurance agent in the insured's country or jurisdiction of residence. As a result, all business submitted to the ING Life Insurance Companies must be referred by an individual or entity that is not a licensed insurance agent in or from the country of residence of the prospective Insured or applicant/owner. Consequently, the Guidelines prohibit the following activities:

- Conducting seminars or distribution announcements, mailings, unsolicited emails, or sending facings that seek to attract local sales representatives in foreign jurisdictions. Only individuals appointed with ING Life Insurance Companies may communicate directly and in person with prospective purchasers.
- Conducting business with a third party marketing organization in foreign jurisdiction such as a brokerage organization that in turn has under appointment, or seeks to appoint, individuals to sell the product.

As stated previously in this document, a producer that is appointed with ING Life Insurance Companies may not pay compensation by, or on behalf of, ING Group and its affiliates, including the ING Life Insurance Companies, to a person or entity in the insured's country or jurisdiction of residence for the purchase of life insurance products issued by the ING Life Insurance Companies. Furthermore, no ING affiliate or ING employee in the country or jurisdiction of residence of the foreign national shall refer such foreign national to a life producer in the United States for the purchase of life insurance products issued by ING Life Insurance Companies.

III.ING International Underwriting Guidelines

A. General

ING offers underwriting guidelines designed especially for the high net worth foreign national market. ING's process includes dedicated international underwriters that will be assigned to each case at the time of submission as well as reinsurance arrangements specifically put in place for foreign national insureds. Under the guidelines, all general account life products are available. Term products are also available with ING retention and facultative submissions. ING's reinsurance treaty includes high auto bind coverage and jumbo limits. To focus our placements on high net worth foreign national individuals, a minimum face amount of \$1,000,000 is required. ING will not accept bundling of contracts to meet the \$1,000,000 requirement (e.g. two term policies of \$750,000). As will be explained below, the Underwriting Guidelines require United States ownership of policies issued (U.S. Ownership Program) and allow for non-U.S. ownership in a limited number of jurisdictions (Non-U.S. Ownership Program). See Section 3C that follows Non-U.S. Ownership Program. A foreign travel and residence questionnaire (see Appendix part B) must be completed and submitted with the application to help the underwriter determine the appropriate rate class.

There are unique underwriting and regulatory considerations presented when issuing life insurance policies on individuals who spend a significant amount of time outside of the United States. This is especially true if the countries in question have poor economic conditions, lower standards of public health or political instability. In addition, the regulations of some countries may limit or prevent their residents or citizens from purchasing life insurance outside of their country of residence. Therefore, ING may not be able to consider proposed insureds from all countries for coverage.

ING'S INTERNATIONAL UNDERWRITING GUIDELINES WILL BE REVISED ACCORDING TO WORLD CIRCUMSTANCES, WHICH MAY REQUIRE IMMEDIATE CHANGES WITHOUT NOTICE REGARDING TRAVEL OR RESIDENCE RATING APPROACHES AND/OR AREA CLASSES. RATING QUOTES FOR FOREIGN TRAVEL OR RESIDENCE ARE TO BE CONSIDERED TENTATIVE UNTIL ACTUAL POLICY APPROVAL.

Please note that no set of guidelines can accommodate every circumstance. Chief Underwriter signoff is required for acceptance of individual consideration and other unusual circumstances. However, these basic underwriting rules are currently in place for all of our HNWFN cases.

- ✓ Ages 18-70.
- ✓ Minimum face amount of \$1MM (except for U.S. citizens and permanent residents).
- ✓ Medical Risks through Table 4 (200% or better).
- ✓ All underwriting requirements must be translated to English prior to submission to ING. ING will incur the costs for these medical records ONLY on permanent products and ONLY if the case is approved by Underwriting.

- ✓ Domestic Age and Amount requirements will apply.
- ✓ No politicians, public figures, missionaries, government leaders, journalists, judicial personnel, or Politically Exposed Persons.
- ✓ No aviation risks.

B. U.S. Ownership

1. General

The ING Underwriting Guidelines allow policies to be offered to Foreign Nationals residing in a broad listing of foreign jurisdictions as well as United States citizens traveling out of the country. An individual's underwriting classification will be impacted by the area class rating assigned to the individual's country of residence (foreign national applicants) or travel (foreign national application and US citizens and permanent residents). Area Classes range from a rating of A to D. Such ratings are updated from time to time and ING may change a rating at any time in its sole discretion. Underwriting classifications include Standard with a flat extra, Standard, Preferred and Super Preferred. Generally, Foreign Nationals from, and/or travel to D class countries, are not allowed. Limited short term vacation travel by a US citizen to a D class country may be accepted. Please contact your HNWFN underwriter with questions, prior to submitting the application.

2. Status of Proposed Insured

A proposed insured will be classified as either: (1) a U.S. citizen or permanent resident, (2) a Foreign National residing in the U.S without permanent resident qualifications, or (3) a Foreign National with foreign residence or long term foreign travel. Generally, U.S. citizens and permanent residents will be considered under the domestic underwriting requirements. However, a U.S. citizen or permanent resident traveling outside the U.S. on a long term basis will be placed in the International Reinsurance Pool.

ING's definition of a permanent resident is as follows.

- ✓ U.S. resident with a green card or holders of E1-2, H1B, K1-4, L1-2 or V1-3 visas with the intent to reside permanently in the U.S and either 5 years continuous residence in the U.S. or multiple other evidences of permanence such as owning a home, marriage to a U.S. citizen, long-term U.S employment, etc.

ING's definition of long term travel is as follows.

- ✓ greater than 12 weeks to A & A+ class countries
- ✓ greater than 10 weeks to B & B+ class countries
- ✓ greater than 4 weeks to C class countries

Non-U.S. Ownership

At this time, citizens of Mexico and Taiwan may own their own policies if they meet the additional following guidelines. In addition, the application needs to comply with all other international underwriting guidelines.

1. Applications. Current (2009 or later) approved applications must be used. As of February 2010, the exceptions to this rule are the state of California and Guam. Because the current applications have not yet been approved in California or Guam, we can accept the past application as long as the "Governing Law and Jurisdiction Agreement" is signed at delivery. This agreement will be included in the policy packet at the time of issue and will be mailed to the Agent/GA for delivery to the customer. A copy of this agreement can be viewed in the appendix. As soon as California and Guam approve the new applications, we will no longer accept the past application.

2. U.S. Connection. The policy owner must have a meaningful connection with the U.S. (At least one condition must apply): Real Estate – Policy owner owns real estate in the U.S.; Physical Presence in U.S. – Policy owner lives in the U.S. at least six months per year; Family Relationships in U.S. – Policy owner has relatives residing in the United States; Financial Assets – Policy owner has financial assets in the U.S.; or Employment – Policy owner works for a U.S. company or owns and works for a business located in the U.S.

3. Financial Underwriting - Policy owner must have a net worth of at least \$2,000,000 verified by a third party.

4. Medical Examinations - All medical exams and labs must be completed by ING-approved vendors in the United States. As discussed in the Appendix, exams in Hong Kong must comply with ING's established procedure.

IV. Compliance

A. Agent Appointment Process and Business Guidelines

In addition to requirements already in place for Retail Life appointments (including regulatory, personal and financial background checks), Sales management will submit for approval by Compliance a HNWFN Distributor Questionnaire for each producer requesting participation in this program. Compliance will review the producer's complaint and investigation history. Any concerns regarding agent conduct will prevent the producer from participating in this program. Continued compliance with the Companies' Business Guidelines will be required for all HNWFN sales.

B. Translation

At no time can any producer arrange for translation or personally translate any contracts, marketing materials applications, forms or illustrations into a foreign language. Any translations must be requested from and completed by the ING Life Insurance Companies. Only marketing materials and non-filed forms will be translated. Any marketing materials created by an agent must be approved by the advertising compliance department before use with customers or potential customers.

C. Sales to Politically Exposed Persons (PEPs) and Immediate Family Members of PEPs

Under the FCPA (Foreign Corrupt Practices Act) the Company is required to have a program to assure that we are not issuing a policy to a Politically Exposed Person (PEP) or their immediate family. A PEP is defined as foreign dignitary or high ranking official of a foreign government. The FircoSoft tool is utilized to screen all new customers against the PEP list; however, this screening process will not find immediate family members of a PEP so extra due diligence is required. This will include utilizing publically available tools such as running a Google search on all HNWFN applicants.

D. Anti-Money Laundering (AML)

All premium payments must be paid in U.S. dollars and through a U.S. bank. In addition, the normal monitoring of any foreign wire transfers or suspicious activity on these policies will be handled by the Compliance Department.

E. Agent Monitoring Program

Agent sales and market conduct practices are monitored through the "Compliance Monitoring Program". This includes a review of new sales activity, customer surveys, replacement activity, complaints and investigations, along with other red flags that are stored within the Compliance Red Flag Database. Producers accessing the HNWFN program are expected to follow the Solicitation Guidelines found in Section II B of this document, and sales activity will be monitored for compliance. Issues with solicitation practices or other agent misconduct will result in termination of the agent's ability to participate in the HNWFN Program and/or other action under the agent's agreement with the ING Life Companies.

V. Administration



A. Policy Activation

1. Delivery of the Life Insurance Policy - All ING Life Insurance policies will be mailed to the GA/Agent once issued. All policies must be delivered to the policy owner in person in the United States by the Agent/GA in the state where the policy is issued.

2. AML/OFAC. ING's usual anti-money laundering and OFAC procedures will be followed. ING's administrative system will recognize whether an agent has completed his/her AML training. If the agent has not completed the AML training an audit message will alert the case manager and the case manager will follow up with the agent until AML is complete. The Administrative system will not allow a policy to be issued unless this requirement is received.

3. Policy Delivery. The Policy Delivery Receipt must be received with signatures for all HNWFN Non U.S. owned policies before the policy will be activated.

B. Premium Payment

All premiums must be paid in U.S. dollars from a U.S. bank account. Payments will be subject to standard compliance monitoring for anti-money laundering.

C. In-force Policy Administration

1. U.S. Address. The policy owner must provide a U.S. billing address (not a P.O. Box) that will be used for all policy communications. We will require a U.S. address as the "billing address" in the ownership portion of the application and the non-U.S. address in the proposed "owner address" portion of the application. See appendix section F.

2. Policy Owner Internet and Call Center Access. Currently, a policy owner uses their Social Security Number to access policy information through the internet or ING's call center. Since a HNWFN policy owner's SSN may not be on ING's policy administration system, those policy owners will need to call the ING Service Center at 1-877-886-5050 and establish a four digit personal information number. Once the PIN is established, the policy owner will have both internet and Call Center access.

D. Tax Treatment

Each policy owner must have a U.S. tax ID or SSN, or must complete a Form W-8BEN. Offshore trust or other type of foreign entity ownership is not allowed as policy owner. When a death benefit is paid or a surrender or withdrawal processed, withholding will be calculated according to applicable tax laws and treaties.


1. Audit Program

In an effort to ensure compliance with the ING HNWFN Guidelines, ING has implemented an audit program of High Net Worth Foreign National Sales. The Audit Program is carried out by ING's Corporate Audit Services (CAS). Such audit program will be carried out consistently with ING's audit methodologies using generally accepted auditing standards. On a risk adjusted periodic basis, CAS will conduct an audit of a limited number of high net worth foreign national sales through a random risk weighted sampling process. Inherent in this process will be the development of an inventory or risks associated with the HNWFN business leading to a thoughtful approach to risk analysis. The audit will review critical components of these Program Guidelines including review of questionnaires, applications, solicitation, policy delivery requirements, policy administration and compliance.

1. Training and Sales Program.

In further support of these Program Guidelines and in conjunction with sales, ING will conduct periodic training and sales program related to its High Net Worth Program and Guidelines. During such training, a review of the Program Guidelines will be provided with special attention focused upon explaining the specific requirements of the guidelines. It is ING's intent to solicit feedback from its distribution partners on the Program Guidelines to promote their implementation and ease of use. All producers and support staff who have completed the HNWFN Distributor Qualification Questionnaire will be invited to attend along with regional account managers active in the HNWFN market. In addition to covering the Program's requirements, a sales forum will be provided during which producers will present their experiences in the HNWFN market.

VIII. Conclusion




We hope that you will have found these HNWFN Program Guidelines helpful in understanding ING's requirements in the HNWFN market. We welcome comments and feedback on its contents in an effort to improve the Program for the producer. We invite you to comment and participate in our periodic sales and training program. We look forward to partnering with you in meeting the needs of High Net Worth Foreign Nationals. We thank you for your review of these materials and for the business that you bring to ING.

IX. Appendix

- A. HNWFN Distributor Questionnaire
- B. ING Foreign Travel and Residence Questionnaire
- C. International Risk Parameters and Area Classes
- D. International Risk Pool Underwriting Guidelines
- E. Hong Kong Procedure
- F. Superior Risk Information Qualifications

A. HNWFN Distributor Questionnaire

	Life															
<h3 style="margin: 0;">HIGH NET WORTH FOREIGN NATIONAL* ("HNWFN") DISTRIBUTOR QUALIFICATION QUESTIONNAIRE</h3>																
<p style="font-size: small; margin: 0;">ReliaStar Life Insurance Company, Minneapolis, MN ReliaStar Life Insurance Company of New York, Woodbury, NY Security Life of Denver Insurance Company, Denver, CO <i>Members of the ING family of companies</i> (These companies are collectively referred to below as "ING".) ING Customer Service Center: 2100 21st Ave. NW, Minot, ND 58703</p>																
 <p style="font-weight: bold; margin: 0;">ING</p> <p style="font-size: x-small; margin: 0;">Your future. Made easier.®</p>																
<p>Please complete this questionnaire as fully as possible. You may attach additional pages if more space is needed.</p> <p><small>* For purposes of this HNWFN Questionnaire and ING's HNWFN Program, a Foreign National means a citizen of any country or jurisdiction other than the U.S. or Canada who does not meet the U.S. permanent residence qualifications of ING Life Companies' International Underwriting Guidelines.</small></p>																
<p>1. Each distributor, including a general agent, writing agent or other individual involved in the solicitation of life insurance sales to HNWFNs, must complete and sign this form. If the distributor solicits through an entity, the distributor must sign the form in an individual capacity and on behalf of the entity.</p> <p>Name _____ Tax ID Number _____</p> <p>Mailing Address (PO boxes not permitted) _____</p> <p>City _____ State _____ ZIP _____</p> <p>Phone (_____) _____ Fax (_____) _____ E-mail _____</p>																
<p>2. Describe the target market of your HNWFN business in the following terms:</p> <p>Nature and profile of typical client _____</p> <p>Client jurisdiction(s) of residence _____ Average Net Worth (U.S. dollars) \$ _____</p>																
<p>3. Estimate your written annualized premium (not just with ING), by jurisdiction and product type for the periods indicated.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 30%;">Jurisdiction</th> <th style="width: 35%;">2008 Premium</th> <th style="width: 35%;">2009 Premium</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Term: Permanent:</td> <td>Term: Permanent:</td> </tr> <tr> <td>2.</td> <td>Term: Permanent:</td> <td>Term: Permanent:</td> </tr> <tr> <td>3.</td> <td>Term: Permanent:</td> <td>Term: Permanent:</td> </tr> <tr> <td>4.</td> <td>Term: Permanent:</td> <td>Term: Permanent:</td> </tr> </tbody> </table>		Jurisdiction	2008 Premium	2009 Premium	1.	Term: Permanent:	Term: Permanent:	2.	Term: Permanent:	Term: Permanent:	3.	Term: Permanent:	Term: Permanent:	4.	Term: Permanent:	Term: Permanent:
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2.	Term: Permanent:	Term: Permanent:														
3.	Term: Permanent:	Term: Permanent:														
4.	Term: Permanent:	Term: Permanent:														
<p>4. Describe in detail how new business will be solicited. Provide separate information for each jurisdiction. Also, describe how policies will be delivered.</p> <p>_____</p> <p>_____</p> <p>_____</p>																
<p>5. Describe the measures you have in place to ensure that you and your producers comply with U.S. and foreign laws and regulations regarding solicitation and placement of life insurance.</p> <p>_____</p> <p>_____</p>																
<p>6. Have all parties identified in Question 1 reviewed "ING's Rules for Soliciting Sales to Foreign Nationals" (below) and do all agree to abide by these rules? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>																
<p>Page 1 of 2 - Incomplete without all pages. Order #147790 01/21/2010</p>																

<https://www2.ing-usa.com/stellent/public/147790.pdf>

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A. HNWFN Distributor Questionnaire (continued)

By signing below:

- I certify that the above answers are true and correct and understand that the Insurance Companies are relying on my answers.
- I agree that I will not take any action or engage in any conduct that contravenes any rule, regulation or law.
- I acknowledge that the Insurance Companies are unregistered, non-admitted foreign insurers in the foreign nationals' countries or jurisdictions of residence.
- I agree that it is my responsibility to abide by all U.S. and foreign laws and regulations including foreign laws concerning permissible activities in a foreign national's country or jurisdiction of residence. Foreign laws relating to the purchase of insurance products from a foreign or non-admitted insurer may be very restrictive and may even apply beyond the legal borders of such country or jurisdiction.
- I agree that any action taken that would require any of the Insurance Companies to be licensed or admitted in any such countries or jurisdictions constitutes a violation of ING's underwriting guidelines and ING's rules for soliciting sales to foreign nationals.
- I understand that the payment of compensation to any referral source in connection with the sale of a specific insurance product of the Insurance Companies may be prohibited in certain foreign countries or jurisdictions.
- I agree that the marketing or solicitation of the Insurance Companies products in any foreign national's country or jurisdiction of residence constitutes a violation of law, ING's underwriting guidelines and ING's rules for soliciting sales to foreign nationals.
- I understand that the Insurance Companies may take necessary disciplinary actions against me or any violation of U.S. or foreign laws and regulations, ING's underwriting guidelines or ING's rules for soliciting sales to foreign nationals.
- I agree that I will notify the Insurance Companies immediately if any of the answers given above are no longer correct, any changes, additions and deletions are necessary, or if I become aware of any violation of U.S. or foreign laws and regulations, ING's underwriting guidelines or ING's rules for soliciting sales to foreign nationals.
- I agree that if I solicit through an entity, I will also sign the form as an officer on behalf of such entity and by so doing, I understand that such entity certifies and agrees to each of the above terms and conditions. Such entity shall also be subject to and must abide by ING's Rules for Soliciting Sales to Foreign Nationals as described below.

Distributor Name _____

 Distributor Signature _____ Date _____

If Distributor solicits through an entity:

Entity Name _____

By _____

Its _____

ING'S RULES FOR SOLICITING SALES TO FOREIGN NATIONALS

Date: January 21, 2010

- All solicitation of life insurance sales policies shall occur in the U.S.
- No written materials of ING or referring in any way to ING shall be brought to or delivered in the home jurisdiction of any insured.
- No mention of ING, or any ING U.S. life insurance company or any ING U.S. life insurance product shall be made to an insured in that insured's home jurisdiction.
- Except as agreed to by ING as part of its HNWFN Non-U.S. ownership program, all policies shall have a U.S. application/owner (e.g. a trust or limited liability company) with a U.S. address.
- All premiums shall be paid in U.S. dollars from a U.S. bank.
- All policies shall be delivered to the applicant/owner in the U.S.
- Observe and maintain strict compliance with all local law requirements prohibiting the entity or person and the ING U.S. life insurance companies from soliciting any insurance business in the foreign national's home jurisdiction as an unlicensed agent or unregistered or non-admitted insurer. Solicitation of life insurance in the foreign national's home jurisdiction includes, but is not limited to, delivery of prospectuses or life insurance contracts, marketing materials or letters soliciting the purchase of ING life insurance products, meeting with the foreign national to discuss ING U.S. life insurance products or other similar prospecting type activities or the payment of compensation to a referral source in connection with the sale of a specific ING life insurance product.
- No referral may be obtained from a locally licensed individual life insurance agent.
- No mention or identification of ING, ING U.S. life insurance companies or ING U.S. life insurance products is to be made by any referral source or any party present during any meeting to discuss the role that life insurance can play in helping the foreign national meet their financial objectives.


ING Executive Approval

Daniel P. Mulheran, President of ING U.S. Retail Life Distribution

Carol Stern, Chief Compliance Officer, ING U.S. Retail Life Business

Kelli Eddy, Chief Underwriter, ING U.S. Retail Life Business

B. ING Foreign Travel and Residence Questionnaire

	RESET FORM
	Life
<p>SUPPLEMENT TO INDIVIDUAL LIFE INSURANCE APPLICATION FOREIGN TRAVEL AND RESIDENCE QUESTIONNAIRE</p> <p><input type="checkbox"/> ReliaStar Life Insurance Company, 20 Washington Avenue South, Minneapolis, MN 55401 <input type="checkbox"/> Security Life of Denver Insurance Company, 1290 Broadway, Denver, CO 80203 <i>A member of the ING family of companies</i> ING Customer Service Center: PO Box 5033, Minot, ND 58702-5033</p>	
 ING Your future. Made easier.®	
<p>Proposed Insured Name (please print) _____ Birth Date _____</p> <p>1. Country of Origin¹ _____ Current Citizenship _____</p> <p>2. Date of entry into the United States (if applicable) _____</p> <p>3. Visa type, symbol, number, and expiration date (if applicable) _____</p> <p>4. Do you live full-time in the USA? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No", list all cities and countries resided in, and the number of weeks/years in each. _____ _____</p> <p>5. Do you intend to remain permanently in the USA? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>6. Do you plan to travel outside the USA in the next two years? <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes", provide details for each country to include specific locations, departure dates, duration and purpose of stay. _____ _____ _____ _____</p> <p>7. List your assets/property both within and outside the USA _____ _____</p> <p>8. List immediate family members by relationship, age, and citizenship Within the USA _____ _____ Outside the USA _____ _____</p> <p>I have read the above questions and answers. I affirm that they are complete and true to the best of my knowledge and belief. I agree that this questionnaire is a part of my application for life insurance.</p> <p>I understand and agree that any person who knowingly provides false, incomplete or misleading information to an insurance company for the purpose of defrauding or attempting to defraud the company commits a fraudulent insurance act, which is a crime, and may be subject to criminal and civil penalties and denial of insurance benefits. Penalties may include imprisonment and/or fines.</p> <p>➔ Proposed Insured Signature _____ Date _____</p>	
<p>¹ Do not answer if you are a resident of California.</p> <p>ICC09 153772 Page 1 of 1 Order #153772 05/21/2009</p>	

<https://www2.ing-usa.com/stellent/public/153772.pdf>

C. International Risk Parameters and Area Classes



U.S. OWNERSHIP

International Risk Fixed Reinsurance Pool Parameters Effective 1/1/2008

Products covered: All General Account Fixed Life Products

Auto bind and jumbo limits:

Jurisdiction	A+	A	B+	B	C
Automatic Binding Limit*	\$30mil	\$25mil	\$18mil	\$15mil	\$5mil
Minimum Face	\$1mil	\$1mil	\$1mil	\$1mil	\$1mil
Best Class	Super Preferred	Preferred	Preferred	Standard	Standard + \$2.00 flat extra
Jumbo Limits	\$35mil	\$35mil	\$35mil	\$35mil	\$25mil

*Includes ING retained amount

People:

- U.S. Citizens & Permanent Residents with Long Term Foreign Travel or Foreign Residence
- Foreign Nationals - Residing in the U.S. without permanent residence qualifications
- Foreign Nationals with Foreign Residence or Long Term Foreign Travel

Definitions:

- U.S. Permanent Resident: Green Card holder OR E 1-2, H1B, K1-4, L1-2, or V1-3 visa holders with either 5 years continuous residence or multiple other evidences of permanence such as owning a home, marriage to a U.S. citizen, long-term U.S. employment, etc.
- Foreign National: Citizen of other than U.S. or Canada not meeting U.S. permanent residence qualifications.

Other:

- Jumbo Limit = In force and applied for with all companies including external replacements - \$35,000,000 for A+, A, B+, B areas and \$25,000,000 for C areas.
- SRI (Superior Risk Information) = Documented net worth of minimum U.S. \$2,000,000, full medical records, excellent medical care.
- "No Auto" = Area Classes listed as "No Auto" cannot be auto bound into the International Pool; will consider for available ING Retention for the area plus facultative coverage.

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). Only ReliaStar Life Insurance Company of New York is admitted and its products issued within the state of New York. All are members of the ING family of companies. Products may vary by state and not be available in all states. © 2009 ING North American Insurance Corporation

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C. International Risk Parameters and Area Classes (continued)



U.S. OWNERSHIP

International Travel (for U.S. Citizens, Permanent Residents & Foreign Nationals)

- ◆ Short term travel
 - Retain “travel from” jurisdiction classification, auto bind limit, and best available rate.
Travel to:
 - A+/A: Up to 12 weeks/year
 - B+/B: Up to 10 weeks/year
 - C: Up to 4 weeks/year
 - D: None

- ◆ Long term travel
 - If destination bears higher risk, change to “travel to” jurisdiction classification, auto bind limit, and best available rate.
 - A+/A: Over 12 weeks/year
 - B+/B: Over 10 weeks/year
 - C: Over 4 weeks/year
 - If destination bears lower risk, retain “travel from” jurisdiction classification, auto bind limit, and best available rate.

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). Only ReliaStar Life Insurance Company of New York is admitted and its products issued within the state of New York. All are members of the ING family of companies. Products may vary by state and not be available in all states. © 2009 ING North American Insurance Corporation

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C. International Risk Parameters and Area Classes (continued)



AREA CLASSES

This section lists classification for each jurisdiction ING's International Underwriting Guidelines cover. Those jurisdictions for which non-U.S. ownership is allowed are marked.

Any part of this section is subject to change at any time, including, but not limited to, jurisdiction classification and non-U.S. ownership availability.

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C. International Risk Parameters and Area Classes (continued)



Area Classes (as of 8/31/09)

Class	Country or Jurisdiction	Remarks
A	American Samoa	
A	Andorra	
B	Anguilla	
B	Antigua and Barbuda	
A	Argentina	
B-no auto	Armenia	Except disputed Nagorno-Karabukh region
A	Aruba	
A+	Australia	
A+	Austria	
B	Bahamas	
A	Bahrain	
B	Barbados	
B-no auto	Belarus	
A+	Belgium	
B	Belize	
A+	Bermuda	
B-no auto	Bosnia & Herzegovina	
B	Brazil	
A+	British Virgin Islands	
C	Brunei	
C	Bulgaria	
A	Canary Islands	
B-no auto	Cape Verde	
A	Cayman Islands	
A	Chile	
C	China - All except Beijing, Guangzhou, Shanghai, Shenzhen, Tianjin & Suzhou	
B	China - Beijing, Guangzhou, Shanghai, Shenzhen, Tianjin & Suzhou	
A	Costa Rica	
B	Croatia	
B	Cyprus	
A	Czech Republic	
A+	Denmark	
B	Dominica	
B	Dominican Republic	
B	Ecuador	
C	Egypt	
C	El Salvador	

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C. International Risk Parameters and Area Classes (continued)



Area Classes (as of 8/31/09) - continued

Class	Country or Jurisdiction	Remarks
B	Estonia	
B	Falkland Islands	aka Islas Malvinas
A+	Finland	
A+	France	
C	French Guiana	
A+	Germany	
A	Greece	
A	Greenland	
B	Grenada	
A	Guadeloupe	
C	Guatemala	
C	Honduras	
A+	Hong Kong	
A	Hungary	
A+	Iceland	
C	India - All except Delhi & Mumbai	Excluding Kashmir & Jammu
B	India - Delhi & Mumbai ONLY	
A+	Ireland	
A+	Ireland (Northern)	
C	Israel	Excluding Gaza & West Bank
A+	Italy	
B	Jamaica	
A+	Japan	
A	Korea, South	
B	Latvia	
A+	Liechtenstein	
B	Lithuania	
A	Luxembourg	
A	Macau	
B-no auto	Macedonia	
B	Malaysia	Caution in some areas
A	Malta	
B-no auto	Marshall Islands	
A	Martinique	
B	Mexico	Non-U.S. ownership allowed (B+ only)
A+	Monaco	
A	Montserrat	
A+	Netherlands	
B	New Caledonia	
A+	New Zealand	
C	Nicaragua	
B	Northern Mariana Islands	

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C. International Risk Parameters and Area Classes (continued)



Area Classes (as of 8/31/09) - continued

Class	Country or Jurisdiction	Remarks
A+	Norway	
B	Panama	
B	Paraguay	
B	Peru	
C	Philippines - Manila only	
A	Poland	
A+	Portugal	
B-no auto	Romania	
B-no auto	Russian Federation	Except Chechnya
B	Saint Kitts and Nevis	
B	Saint Lucia	
B	Saint Vincent and the Grenadines	
A	San Marino	
C	Saudi Arabia	
B-no auto	Serbia & Montenegro	
B	Seychelles	
A+	Singapore	
B	Slovakia	
B	Slovenia	
A+	Spain	
A+	Sweden	
A+	Switzerland	
A+	Taiwan	Non-U.S. ownership allowed
C	Thailand - Bangkok only	Need negative Hep screen and negative HIV
C	Trinidad and Tobago	
C	Turkey	Major cities only
A	Turks/Caicos	
B-no auto	Ukraine	
A	United Arab Emirates	
A+	United Kingdom	
A	Uruguay	
A+	US Virgin Islands	
A+	Vatican City	
C-no auto	Venezuela	
C-no auto	Vietnam	
A+	Virgin Islands	
B-no auto	Yugoslavia	Except Kosovo

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). Only ReliaStar Life Insurance Company of New York is admitted and its products issued within the state of New York. All are members of the ING family of companies. Products may vary by state and not be available in all states. © 2009 ING North American Insurance Corporation

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D. International Risk Pool Underwriting Guidelines



U.S. OWNERSHIP

International Risk Pool Underwriting Guidelines

Ages	18 – 70 <i>For ages 0-17 and 71+, individual consideration generally for retention only.</i>
Plans	Permanent products only individual and survivorship.
Riders	No riders except Accelerated Death Benefit and term riders on the primary insured.
Minimum Policy Size	For Foreign Nationals in the International Risk Pool, minimum policy size is \$1,000,000. For U.S. Citizens (& Green Card holders) in the International Risk Pool, minimum policy size will be product minimum.
Medical Ratings	200% or better Flat extra equivalents \$2.50/M = 25 debits.
Non-Medical Ratings	For B & C areas, no ratable avocation or occupation risks will be accepted.
Area Ratings	No flat extras for A, A+, B, or B+ areas. *C* areas will be rated \$2.00/M flat extra. Best class rating for B and C areas in Standard (no preferred classes).

Full regular medical and financial requirements for age and amount applied for. Exam and APS requirements will be in English. Application will be signed by owner/applicant in the U.S. Policies will be U.S. owned and paid in U.S. dollars. ING's usual anti-money laundering and OFAC procedures will be followed. No politicians, public figures, missionaries, government leaders, journalists, judicial personnel, police force, trade union officials, military, or aviation risks.

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E. Hong Kong Procedures:

ING will consider allowing the exam and part I to be completed in Hong Kong for Taiwan residents and others visiting Hong Kong. It is not available for Hong Kong residents or residents of mainland China. The following stipulations will apply:

1. The insured will be assisted by an insurance broker licensed in Hong Kong who is not an ING agent, but rather an agent of the insured.
2. At no time while the insured is in Hong Kong has he/she been advised on any insurance matter except by a registered representative of a Hong Kong licensed insurance broker.
3. The insured is not permitted to fill out the application with the assistance of anyone in Hong Kong who is an agent of ING.
4. This is only available to individuals visiting Hong Kong. No Mainland China resident/citizen or Hong Kong resident/citizen will be considered in this process.
5. A copy of the proposed insured's passport including pictures and credentials, date stamp entry in passport or on compatriot permit page for Taiwan residents to mainland and exam needs the Exam One stamp for the Hong Kong outlet is required.

F. Superior Risk Information Qualifications:

With the following documentation, an individual in B jurisdictions (normally \$15MM auto bind) will qualify for B+ auto bind limit (\$18MM) and preferred rate at best verses standard.

- A documented minimum of US\$2MM in net worth
 - Third party financials
 - CPA
 - Private banking facility
 - Attorney
 - Tax returns
 - Business appraisal
- Other Superior Risk Information
 - Full medical records
 - Excellent medical care



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All death benefit guarantees are based on the financial strength and claims paying ability of the issuing company, which is solely responsible for obligations under its own policies. Loans and withdrawals may generate an income tax liability, reduce available cash value and reduce the death benefit or cause the policy to lapse.

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