

ING: Global and Domestic Leadership Position

When you choose to do business with the ING family of companies, you are choosing to do business with a global leader.

Every year Fortune publishes a list of the world's leading companies based on revenues; this list is a frequently-cited barometer – both in the United States and across the globe – of what are thought to be top companies. According to the July 2009 Fortune Global 500 list of world's largest public companies, ING Groep N.V. ("ING") is ranked eighth based on a composite index of sales, profits, assets, and market value.

Pensions & Investments is an industry publication that provides news, research, and analysis regarding the institutional investment market. Each year, *Pensions & Investments* analyzes and ranks the companies that provide recordkeeping services in the defined contribution arena, based on a number of measures including number of plan sponsors, number of employees participating and assets under management. For 2009, the ING US Retirement Services Defined Contribution organization in the United States ranked #1 for number of sponsors, #2 for number of participants, and #3 for plan assets under management.¹

While size and scale of the parent organization are considerations, you should consider the relative financial strength of the specific operating company through which you invest your retirement dollars. Several leading financial rating agencies regularly review these companies, and ING's U.S. insurance companies consistently receive among the highest of these ratings. Details of ING's U.S. insurance companies' ratings from A.M. Best and Company, Fitch, Moody's and Standard and Poor's can be found on the reverse.

***Pensions & Investments* 2009 Defined Contribution Recordkeepers Survey¹**

#1 Number of Sponsors	~52,798
#2 Number of Participants	~7.0 million
#3 Assets Under Management and Administration	\$237 billion

1 Source: *Pensions & Investments* special report on Top DC Recordkeepers, July 2009, based on March 31, 2009 data

continued on reverse



Your future. Made easier.®

Financial Strength... and the ING U.S. Insurance Companies

ING U.S. Insurance Company Ratings* from Leading Agencies

(Ratings from each agency are highlighted in the table below. Ratings are as of 10/27/09, and are subject to change.)

	Fitch Ratings ¹	Standard & Poor's ²	Moody's ³	A.M. Best ⁴
SECURE	AAA = Exceptionally Strong	AAA = Extremely Strong	Aaa = Exceptional	A++ = Superior
	AA+ = Very Strong	AA+ = Very Strong	Aa1 = Excellent	A+ = Superior
	AA = Very Strong	AA = Very Strong	Aa2 = Excellent	A = Excellent
	AA- = Very Strong	AA- = Very Strong	Aa3 = Excellent	A- = Excellent
	A+ = Strong	A+ = Strong	A1 = Good	B++ = Good
	A = Strong	A = Strong	A2 = Good	B+ = Good
	A- = Strong	A- = Strong	A3 = Good	
	BBB+ = Good	BBB+ = Good	Baa1 = Adequate	
	BBB = Good	BBB = Good	Baa2 = Adequate	
	BBB- = Good	BBB- = Good	Baa3 = Adequate	
VULNERABLE	BB+ = Moderately Weak	BB+ = Marginal	Ba1 = Questionable	B = Fair
	BB = Moderately Weak	BB = Marginal	Ba2 = Questionable	B- = Fair
	BB- = Moderately Weak	BB- = Marginal	Ba3 = Questionable	C++ = Marginal
	B+ = Weak	B+ = Weak	B1 = Poor	C+ = Marginal
	B = Weak	B = Weak	B2 = Poor	C = Weak
	B- = Weak	B- = Weak	B3 = Poor	C- = Weak
	CCC = Very Weak	CCC+ = Very Weak	Caa1 = Very Poor	D = Poor
	CC = Distressed	CCC = Very Weak	Caa2 = Very Poor	E = Supervision
	C = Distressed	CCC- = Very Weak	Caa3 = Very Poor	F = In Liquidation
		CC = Extremely Weak	Ca = Extremely Poor	
		C = Lowest		

* Ratings apply to the financial strength and claims-paying ability of ING Life Insurance and Annuity Company, ING USA Annuity and Life Insurance Company, ReliaStar Life Insurance Company and ReliaStar Life Insurance Company of New York, and their General Accounts, and not to the safety or performance of the separate accounts or underlying investments.

1 Adjusted 10/27/09 from A to A-

2 Affirmed 10/26/09

3 Adjusted 10/27/09 from A1 to A2

4 Adjusted 4/24/2009 from A+ to A

At the time of the printing of this material, the published rating(s) were based on the following:

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 is the third highest of 15 ratings.

Fitch assigns ratings from AAA to C based on a company's financial strength. A- is the seventh highest of 19 ratings.

Moody's Investor Service (Moody's) assigns ratings from Aaa to C based on a company's financial security. Ratings falling within the "Secure" category are noted by Moody's as "Investment Grade," whereas ratings contained within the "Vulnerable" category are noted as "Speculative Grade." A2 is the sixth highest of 21 ratings.

Standard & Poor's assigns ratings from AAA to CC based on a company's financial security. A+ is the fifth 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 are as of 10/27/09 and are subject to change. The assets and rankings of ING Groep N.V. have no impact on the issuing insurance company's ability to meet its obligations or upon the performance of its products.

NYSE: ING www.ing-usa.com

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