



August 5, 2009

Replacement Policy for ING Family of Companies

As a reminder to our valued distributors, the ING family of companies defines a replacement as any transaction in which new life insurance or a new annuity is to be purchased and, because of that transaction, existing life insurance or an annuity has been or will be:

1. Lapsed, forfeited, surrendered or partially surrendered, assigned to the replacing insurer or otherwise terminated;
2. Converted to paid-up insurance, continued as extended term insurance or continued under another form of non-forfeiture benefit, or otherwise reduced in value by other policy values;
3. Amended so as to effect either a reduction in benefits or in the term for which coverage would otherwise remain in force or for which benefits would be paid;
4. Reissued with any reduction in cash value; or
5. Used in a financed purchase (not applicable to annuity transactions).

If one of the above transactions is processed on an existing life policy or contract within a time period beginning four months before or up to 13 months after the issue date on the new life policy or contract, a replacement has occurred. This definition only applies to individual life insurance policies and annuity contracts – both general account and variable account and internal and external. Some states may have additional requirements.

You may read the entire replacement definition in the Business Guidelines Brochure, available to all appointed agents on the ING for Professionals website (<https://www2.ing-usa.com/portal/public/login>).

Together with our field partners, the ING family of companies is highly committed to ensuring quality customer service.

If you have any questions, please contact the ING Service Center at 877-882-5050 between the hours of 8:00 AM and 6:00 PM Central Time, Monday through Friday.

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