



BUSINESS CONTINUITY PLAN SUMMARY

ING FINANCIAL PARTNERS

MEMBER SIPC

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ING Financial Partners, Inc. (“ING Financial Partners”) understands the importance of ensuring our customers have continued access to their funds and securities in the event our home office operations are impacted by a disaster. As a result, we have developed and maintain a business continuity plan that describes the means by which ING Financial Partners’ home office operations in Des Moines, Iowa, will respond to future significant business disruptions of varying degrees of severity.

ING Financial Partners’ home office operations in Des Moines, Iowa, are equipped for resumption of business in the event a significant business disruption affects the building, business district, city and/or the region. We will continue to conduct business during those disruptions and may choose to relocate key personnel and services to our designated backup facilities. Relocations of critical functions will be completed within four hours of the significant business disruption.

ING Financial Partners’ Data Center is located in Minneapolis, Minn. In addition, several of our critical functions are performed in our affiliated offices located in Des Moines, Iowa and in El Segundo, Calif., and our Brokerage business is operated by our Clearing Firm that is located in a different region of the country. All of these providers—our affiliated offices in Des Moines, Iowa and in El Segundo, Calif.; our Clearing Firm; and our Data Center—have complete business continuity plans designed to allow them to continue operations in the event they experience a significant business disruption. Their plans include redundancies, alternate facilities and recovery time objectives that support our plan.

In the event of a significant business disruption at ING Financial Partners’ main location in Des Moines, Iowa, customers may contact their ING Financial Partners representative directly, or our home office at 800.356.2906.

Please be advised that while we have detailed plans in place, we cannot guarantee we will be able to recover as quickly as outlined above under all possible circumstances. Our recovery time objective may be negatively impacted by the unavailability of third parties and/or other circumstances beyond our control.

Our business continuity plan is reviewed and tested throughout the year and is subject to modification. To obtain the most current version of this summary, you may refer to our Web site at www.INGFinancialPartners.com or contact your ING Financial Partners representative to request an updated summary be delivered by mail.