

PlanFIRST™ Sponsor Services for ERISA Plans

Almost every decision sponsors make to administer their retirement savings plans is tied to a fiduciary obligation. In the current regulatory climate, sponsors are more aware than ever of the need to make an informed commitment to their role as fiduciaries.

To support our customers in continuing to meet these obligations, ING offers PlanFIRST™, a unique set of resources designed to empower sponsors to act with deliberation and confidence in their fiduciary capacities.

Fiduciary Responsibilities

The Employee Retirement Income Security Act (ERISA), the 1974 legislation governing the U.S. pension industry, exacts standards of conduct much higher than the law generally imposes on an employer's relations with its employees. These standards include the:

- **Exclusive Purpose Rule**—The fiduciary must act solely in the interest of plan participants for the exclusive purpose of providing benefits to participants and defraying reasonable expenses of the plan.
- **Prudent Expert Rule**—The fiduciary must act with the care, skill and prudence under the circumstances then prevailing that a prudent expert would use.
- **Diversification Rule**—The fiduciary must diversify the investments of the plan so as to minimize the risk of large losses.
- **Plan Document Rule**—The fiduciary must act in accordance with plan documents to the extent consistent with ERISA.

Demonstrated due-diligence procedures are critical to managing the potential risk and liability associated with these standards.



The ING Solution

PlanFIRST™, ING's suite of sponsor services, guides our customers through today's increasingly complex regulatory environment to help them make prudent and informed decisions relating to their plans and participants.

These services include:

- **Fiduciary Support** – We provide comprehensive support to empower sponsors to act with deliberation and confidence in their fiduciary capacities to administer their plans in the sole interest of their participants.
- **Investment Flexibility** – Our flexible architecture adapts readily to creating an investment lineup with competitively priced funds responsive to participants' strategic needs.
- **Reporting and Disclosure** – We deliver full reporting services through Sponsor ConnectSM, along with clearly established relationship-management tools and practices. We are an industry leader in comprehensive direct- and indirect-fee disclosure for services. In addition, we are available to communicate with our customers on every aspect of our service relationship.
- **Service Standards** – Our contractual standard of care for recordkeeping services ensures that participants in a plan will be entitled to the full benefits that they have been promised under the plan. In addition, plan sponsors will be assured of fulfilling their fiduciary obligations for the selection and monitoring of our organization as their plans' service provider. Plan-specific information is available through Sponsor Connect, ING's browser-based customer inquiry and reporting interface.
- **Trends and Communication** – As a premier industry leader serving a sophisticated customer base, ING has the capability to identify, quantify, evaluate and provide insight on emerging trends to enable strategic planning and informed decision making.

Online Fiduciary Resources

PlanFIRST *Online*, our electronic library, provides convenient desktop access to the materials sponsors need for making informed decisions as fiduciaries and allows for continual updates.

The library's proprietary collection is continually updated and includes:

- Fiduciary Standard of Care
- ERISA guides for sponsors and their counsels
- Compliance checklists
- White papers
- Timely and topical newsletters
- Web cast replays

Sponsors can turn to PlanFIRST Online at any time when they need general information, specific answers to time-sensitive questions, best-practice procedures, plan-design strategies or thoughtful commentary from industry experts.

FIRST Things First

Our organization has always been at the forefront of the industry with proactive compliance solutions, investment flexibility and comprehensive disclosure.

"PlanFIRST supports our customers in both the private and public sectors in meeting their fiduciary obligations," said Gary Jenkins, deputy general counsel for ING.

"PlanFIRST captures what has always been the culture of our organization since our inception—our customers and their participants come first in everything we do."

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Sponsor Connect is a service mark of ING Institutional Plan Services, LLC.

