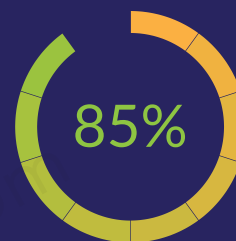


Voya Investment Management CO.

TRUST SCORE



Voya Investment Management CO., federally registered in 1973, is a Registered Investment Advisor (RIA) in 52 state(s) with a licensed staff of 86 advisors. Voya Investment Management CO. manages \$103 billion and provides investment advisory services for 5,759 clients (1:67 advisor/client ratio).

BENEFITS

- Firm uses a transparent fee-only model
- Firm has \$1B or more in assets under management
- Firm has been federally registered for 45 years
- Firm services over 1,000 clients
- Communications sent to the firm's website are secure and encrypted
- Firm does not have a disciplinary history
- Firm does not have any misdemeanor convictions
- Firm does not have any felony convictions
- Firm does not have an attorney conflict

CONSIDERATIONS

- There is only one licensed advisor for every 67 clients (industry average 1:50)
- Firm is a broker-dealer, or is affiliated with one, and may be subject to compensation-related conflicts of interest
- Firm actively engages in insurance sales and may be incentivized to insure clients with products that generate high sales commissions when lower cost alternatives may exist
- Firm privately manages or owns some of the products they recommend and may be incentivized to sell those products over others to their investors
- Firm may recommend proprietary investments and products that generate larger commissions than other similar non-proprietary products

BENEFITS (cont.)

CONSIDERATIONS (cont.)

Firm may receive soft-dollar benefits that could incentivize them to push trades through broker-dealers that provide advantages to the firm instead of through broker-dealers that could provide the best execution for their clients

A regulatory agency other than the SEC or CFTC has previously entered an order against this firm in connection with investment-related activity