

## ING – Investment Provider Performance Standards Effective June 13, 2011

| Performance Standard Description   | What Participants Can Expect  | Financial Penalty If Standard Not Met   |
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| Respond in writing with a copy to the employer, to written or verbal participant complaints within 5 business days.  | Participant should expect to receive a response within 5 business days after making verbal or written complaints. Providers are required to inform the Plan Administrator in order to determine whether plan-level corrective actions are required. | \$100 per incident if no response within 5 business days                              |
| Answer telephone calls to national call center within 90 seconds, 90% of the time.   | When participants call the national call center, they should expect their call to be answered within 90 seconds, at least 90% of the time.  | \$1,000 for failure to meet annual average  |
| Mail participant statements within 10 business days after quarter end.   | Participants should expect to receive their quarterly account statements with a postmark date on or before the 10 <sup>th</sup> business day of the month following the quarter end.  | \$5 per participant per quarter for each statement postmarked after 10 business days. |
| Process investment fund transfers, contribution reconciliation and posting within one business day after receipt of complete instructions.                         | Participants should expect their instructions about changes to account investments to be processed within one business day of receipt of complete instructions by the national service center.  | \$1,000   |
| Process emergency withdrawal distributions, rollover requests, and general distribution requests within 5 business days of receiving fully completed instructions. | When participants request account withdrawals, they should expect the withdrawal to be executed within 5 business days of the national service center's receipt of fully completed paperwork.   | \$1,000 annually for failure to meet deadline for 90% of actions.                     |
| Develop and implement customer satisfaction survey at established intervals.   | Participants should expect to receive customer service surveys no later than August 2011, July 2013, July 2014.   | \$500 - \$1000 for failure to provide surveys to participants                         |
| Provide established number of educational seminars to participants.  | Participants should continue to receive numerous educational opportunities on a wide variety of topics related to financial issues in retirement.   | \$1,000 for failure to execute annual educational plan                                |
| Provide quarterly newsletters to participants.   | Participants should receive newsletters about the benefits available through the plan, and other timely related information, on a quarterly basis.  | \$500 for failure to provide newsletters  |

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| Representatives will be available on-site according to an established quarterly schedule.  | Participants – current and future – should expect the investment provider representatives to be present at County worksites to meet with employees about their retirement savings needs. (Schedule is published on County Deferred Comp website)  | \$1,000 annually if schedule is not met at least 75% of the time.             |
| Provide communication to participants describing investment advice services, access to advice, and any fees charged for investment advice services.        | Participants should receive clear communication regarding their options to receive investment advice, and any associated fees, upon approval of such communication by the Plan Administrator. <i>Note: Advice is available through MorningStar online free of charge. Comprehensive financial plan is available free of charge. Participants enrolling in a Self Directed Brokerage Account will be charged an annual fee of \$50 plus fees for account trades.</i> | \$500 for failure to provide communication on schedule                        |
| Provide annual summary of results of Performance Standards for communication to participants.  | Participants can expect an annual report of how well the performance standards were met, to be published to the County's Deferred Compensation website. Report would be updated each summer.  | \$1,000 for failure to provide report within 30 days of contract anniversary. |
| Encrypt all laptops and computers containing information about County plan participants. Notify Plan Administrator within 24 hours of any data compromise. | Participants should expect their information to be treated with the highest level of security and to be immediately informed in the event of a security breach.   | \$100 for each participant information compromise                             |