

The power of hindsight.

Imagine that power used in a crediting strategy.

The power of ING Indexed Universal Life-Global is the valuable death benefit protection supported by policy values calculated under fixed and indexed crediting strategies. The Fixed Strategy is based upon a current credited interest rate declared by us that will be in effect for at least 12 months. At each policy anniversary the rate may change, but it will never be less than the guaranteed minimum interest rate of 2% per year.

Along with a Fixed Strategy, ING IUL-Global has an Indexed Strategy with a five year point-to-point look-back period and calculates the index credit under a formula using a portion of the better performing two out of three indexes, as follows:

- 75% of the highest index change rate, plus
- 25% of the next highest index change rate; plus
- 0% of the lowest index change rate

The table below shows how 5-year index change rates have varied from year to year. It also shows how each index ranked when compared to the other two indexes. Past index performance does not represent future performance of these indexes.

Historical Values 1990 - 2009

Best Performing

Second Best Performing

Year	5-Year Index Change Rates ¹			Applying the Hindsight Overweighting Methodology, 1% Guaranteed Minimum Annual Interest with the Current No Index Cap and 60% Participation Rate ²	
	S&P 500 [®]	EURO STOXX 50 [®]	Hang Seng Index	Hypothetical 5-Year Cumulative Return ³	Hypothetical Annual Interest Crediting Rate
1990	76.53%	0.00%	95.74%	54.56%	9.10%
1991	58.87%	0.00%	96.42%	52.27%	8.77%
1992	49.37%	24.43%	98.43%	51.70%	8.69%
1993	70.24%	60.91%	198.81%	100.00%	14.87%
1994	42.65%	42.68%	242.06%	115.65%	16.61%
1995	65.49%	39.62%	198.84%	99.30%	14.79%
1996	78.16%	69.99%	205.24%	104.16%	15.34%
1997	108.46%	125.80%	137.28%	87.36%	13.38%
1998	140.74%	157.51%	30.09%	93.50%	14.11%
1999	188.61%	181.09%	38.04%	113.90%	16.42%
2000	161.37%	266.71%	77.38%	144.22%	19.55%
2001	77.15%	142.88%	8.90%	75.87%	11.95%
2002	15.50%	34.01%	-18.80%	20.08%	3.73%
2003	-11.24%	-22.02%	10.04%	8.30%	1.61%
2004	-14.71%	-25.86%	4.11%	7.21%	1.40%
2005	-14.70%	-36.33%	-8.93%	5.10%	1.00%
2006	11.31%	-4.27%	39.69%	20.22%	3.75%
2007	51.16%	46.65%	128.73%	65.99%	10.67%
2008	26.60%	37.42%	107.73%	54.54%	9.10%
2009	-16.31%	-9.77%	39.27%	18.46%	3.45%

The Hypothetical 5-Year Cumulative Return and Hypothetical Annual Interest Crediting Rate figures in the table above are intended to show how index credit rates under the ING IUL-Global Indexed Strategy would have been calculated based on certain assumptions and averaged annual historical index returns. They do not represent actual index credit rates that would have been credited during the periods shown if the product had been available because, among other things, the index caps and participation rates for each applicable block may have been different than those assumed. Just as past index performance does not represent future index performance, the information in the table above does not represent past or future performance of the ING IUL-Global Indexed Strategy.

¹ The 5-Year Index Change Rate shown for each year is the average index change rate for 12 hypothetical index blocks calculated based on changes in index values from the 28th day of each month during that year and the same date five years earlier.

² If the guaranteed minimum Index Cap and Participation Rate were used, the results would be significantly lower. The Index Cap and Participation Rate are set on a block's start date and will not change for that index block. Also, the figures shown do not reflect any deductions for cost of insurance or other policy charges or fees. If such deductions were reflected in the calculations, the results would be lower.

³ The figures in this column equal the Hypothetical Annual Interest Crediting Rate in the next column compounded over 5 years.

Please note: While your policy values may be affected by external indexes, your policy is not an investment in the stock market and does not participate in any index fund, stock or equity investments. This product is not designed to be an investment vehicle.

Your client gets a portion of the best two out of the three every time at the end of each 5-year period! The index with the lowest change rate over the period is not used.

Interest credited under the Indexed Strategy may be limited by an Index Cap⁴ (guaranteed not to be less than 100%) and will be limited by a Participation Rate⁵ (guaranteed not to be less than 15%), but it is guaranteed not to be less than 1% per year.

⁴ **Index Cap:** The limit on the weighted index change rate.

⁵ **Participation Rate:** The portion of the weighted index change rate used to determine the index credit rate.

Hindsight, as they say, is 20/20 and quite valuable. Index values will vary over time and you can never predict what will happen in the future. But with a hindsight approach that uses the top two-performing indexes and over weights the best performing index in the calculation, you don't have to try and predict the better performing indexes in the beginning.

Learn more about how you can

harness the power of hindsight with

ING IUL-Global

CALL: Your ING Life
Companies' Representative

CLICK: ING for Professionals
at www.inglifeinsurance.com

CONTACT: ING Life Sales Support at
1-866-ING-SELL (866-464-7355)

ING IUL – GLOBAL IS A FLEXIBLE PREMIUM ADJUSTABLE UNIVERSAL LIFE INSURANCE POLICY THAT OFFERS A DEATH BENEFIT TO THE BENEFICIARIES OF THE POLICY AND SHOULD BE PURCHASED TO MEET YOUR LIFE INSURANCE NEEDS. WHILE THE POLICY VALUES MAY BE DETERMINED BY REFERENCE TO AN INDEX-LINKED CREDITING STRATEGY, SUCH VALUES SUPPORT THE DEATH BENEFIT OFFERED UNDER THE POLICY. THE POLICY IS NOT A VARIABLE CONTRACT OR AN INVESTMENT CONTRACT.

ING Indexed Universal Life-Global, policy form series #1180-12/09 with an equity indexed feature, varies by state and may not be available in every state. It is issued by Security Life of Denver Insurance Company, a member of the ING family of companies. Not available in New York. The index cap and index participation rate are subject to change for new index blocks. All guarantees are based on the financial strength and claims paying ability of Security Life of Denver Insurance Company who is solely responsible for the obligations under its own policies.

The S&P 500® (Standard & Poor's 500® Composite Stock Price Index) is an index of the stock performance of 500 publicly traded companies that does not reflect the dividends payable on the underlying stocks. "Standard & Poor's®," "S&P®," "S&P 500®," "Standard & Poor's 500," and "500" are trademarks of The McGraw-Hill Companies, Inc. and have been licensed for use by Security Life of Denver Insurance Company. The Policy is not sponsored, endorsed, sold or promoted by Standard & Poor's and Standard & Poor's makes no representation regarding the advisability of investing in the Policy.

EURO STOXX 50® Index – An index of blue-chip stocks that are represented by 50 stocks covering the largest sector leaders in the EURO STOXX 50® index. It does not reflect dividends payable on the underlying stocks. The EURO STOXX 50® index is the intellectual property

(including registered trademarks) of STOXX Limited, Zurich, Switzerland and/or its licensors ("Licensors"), which is used under license. The ING Indexed Universal Life – Global insurance policy is based, in part, on the Index and is in no way sponsored, endorsed, sold or promoted by STOXX and its Licensors and neither of the Licensors shall have any liability with respect thereto.

Hang Seng Index – An index of the largest and most liquid stocks listed on the Stock Exchange of Hong Kong. It does not reflect dividends payable on the underlying stocks. The Hang Seng Index (the "Index") is published and compiled by Hang Seng Indexes Company Limited pursuant to a license from Hang Seng Data Services Limited. The mark and name "Hang Seng Index" are proprietary to Hang Seng Data Services Limited. Hang Seng Indexes Company Limited and Hang Seng Data Services Limited have agreed to the use of, and reference to, the Index by Security Life of Denver Insurance Company ("Security Life") in connection with this indexed universal life insurance policy (the "Policy"), BUT NEITHER HANG SENG INDEXES COMPANY LIMITED NOR HANG SENG DATA SERVICES LIMITED WARRANTS OR REPRESENTS OR GUARANTEES TO ANY BROKER OR HOLDER OF THE POLICY OR ANY OTHER PERSON (i) THE ACCURACY OR COMPLETENESS OF THE INDEX AND ITS COMPUTATION OR ANY INFORMATION RELATED THERETO; OR (ii) THE FITNESS OR SUITABILITY FOR ANY PURPOSE OF THE INDEX OR ANY COMPONENT OR DATA COMPRISED IN IT; OR (iii) THE RESULTS WHICH MAY BE OBTAINED BY ANY PERSON FROM THE USE OF THE INDEX OR ANY COMPONENT OR DATA COMPRISED IN IT FOR ANY PURPOSE, AND NO WARRANTY OR REPRESENTATION OR GUARANTEE OF ANY KIND WHATSOEVER RELATING TO THE INDEX IS GIVEN OR MAY BE IMPLIED. The process and basis of computation and compilation of the Index and any of the related formula or formulae, constituent stocks and factors may at any time be changed or altered by Hang Seng Indexes Company Limited without notice. TO THE EXTENT

PERMITTED BY APPLICABLE LAW, NO RESPONSIBILITY OR LIABILITY IS ACCEPTED BY HANG SENG INDEXES COMPANY LIMITED OR HANG SENG DATA SERVICES LIMITED (i) IN RESPECT OF THE USE OF AND/OR REFERENCE TO THE INDEX BY SECURITY LIFE IN CONNECTION WITH THE POLICY; OR (ii) FOR ANY INACCURACIES, OMISSIONS, MISTAKES OR ERRORS OF HANG SENG INDEXES COMPANY LIMITED IN THE COMPUTATION OF THE INDEX; OR (iii) FOR ANY INACCURACIES, OMISSIONS, MISTAKES, ERRORS OR INCOMPLETENESS OF ANY INFORMATION USED IN CONNECTION WITH THE COMPUTATION OF THE INDEX WHICH IS SUPPLIED BY ANY OTHER PERSON; OR (iv) FOR ANY ECONOMIC OR OTHER LOSS WHICH MAY BE DIRECTLY OR INDIRECTLY SUSTAINED BY ANY BROKER OR HOLDER OF THE POLICY OR ANY OTHER PERSON DEALING WITH THE POLICY AS A RESULT OF ANY OF THE AFORESAID, AND NO CLAIMS, ACTIONS OR LEGAL PROCEEDINGS MAY BE BROUGHT AGAINST HANG SENG INDEXES COMPANY LIMITED AND/OR HANG SENG DATA SERVICES LIMITED IN CONNECTION WITH THE POLICY IN ANY MANNER WHATSOEVER BY ANY BROKER, HOLDER OR OTHER PERSON DEALING WITH THE POLICY. Any broker, holder or other person dealing with the Policy does so therefore in full knowledge of this disclaimer and can place no reliance whatsoever on Hang Seng Indexes Company Limited and Hang Seng Data Services Limited. For the avoidance of doubt, this disclaimer does not create any contractual or quasi-contractual relationship between any broker, holder or other person and Hang Seng Indexes Company Limited and/or Hang Seng Data Services Limited and must not be construed to have created such relationship.

These unmanaged indexes are not intended to represent specific investments. Investors cannot invest directly in an index. Past performance is no guarantee of future results. © 2010 North America Insurance Corporation cn65095032011

