

Initial Margin Segregation Disclosure Effective December 31, 2012, if you supply funds or other property to ING Bank NV ('ING') to margin, guarantee, or secure your obligations to ING under an uncleared "Swap" as defined in Commodity Exchange Act section 1a(47), you have the right to require segregation of those funds or other property other than with respect to variation margin payments. This notification is deemed to be repeated at the time of entry into each transaction with ING. Please note that to segregate the initial margin, the property must be a type that may be held by a third party custodian. Furthermore, there may be additional costs and time associated with documenting the arrangement and entering into uncleared swap transactions. If you would like further information on the above, please reach out to your ING contact.