

NOTICE OF CERTIFICATION

April 6, 2006

TO: CERTAIN MEMBERS OF THE PENSION PLAN FOR EMPLOYEES OF ING CANADA AND ITS AFFILIATED COMPANIES (FORMERLY WELLINGTON PLAN), AS IT HAS BEEN AMENDED FROM TIME TO TIME (THE "PLAN") AND IN PARTICULAR, THOSE MEMBERS WHO CEASED TO BE EMPLOYEES OF THE WELLINGTON INSURANCE COMPANY ("WELLINGTON") BETWEEN THE PERIOD OF NOVEMBER 1, 1989 AND JUNE 30, 1990 AS A RESULT OF THE RELOCATION OF THE CORPORATE HEAD OFFICE OF WELLINGTON FROM TORONTO TO LONDON, ONTARIO

RE: PENSION SURPLUS

NATURE OF THE PROCEEDING

ING Canada Inc., a successor to Wellington, has commenced an application in the Ontario Superior Court of Justice to permit distribution of part of the surplus in the Pension Plan for Employees of ING Canada Inc. and its affiliated companies (formerly the Wellington Plan) arising from the partial wind up of the Plan effective June 30, 1990.

The application was certified by the Honourable Mr. Justice Cullity on March 28, 2006 as a class proceeding under the *Class Proceedings Act*, 1992.

The outcome of this application will affect whether or not you receive a distribution of any of the surplus in the Plan.

REPRESENTATIVE OF THE CLASS

The Court has appointed Sidney Harris as the Representative Respondent for the members of the Plan to whom this notice is being sent.

LEGAL REPRESENTATION

The firm of Paliare Roland Rosenberg Rothstein LLP has been appointed to represent Sidney Harris and the Respondent Class in these proceedings. Mr. Harris is instructing the Class Counsel in these proceedings.

ORDER BINDING ON ALL MEMBERS OF THE CLASS

An order of the Court in this Application will bind all members of the Class (whether favourable or unfavourable), unless such person chooses to opt out of the class proceeding in accordance with the provisions herein.

OPTING OUT

In order to opt out of this class proceeding, you must ensure that written notice to that effect is sent by registered mail or by fax on or before May 19, 2006 to:

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Barristers & Solicitors
250 University Avenue
Suite 501
Toronto, ON M5H 3E5

Attention: Andrew K. Lokan

Telephone: 1-888-638-7467

Facsimile: (416) 646 4301

If you do not opt out prior to this date, you will be deemed to be a member of the Class and your legal rights may be determined without your further participation. You may wish to obtain independent legal advice with respect to this matter if you choose to opt out of this proceeding.

INQUIRIES

All inquiries with respect to this proceeding should be directed to counsel for the Representative Respondent as noted above.

**PALIARE ROLAND ROSENBERG
ROTHSTEIN LLP**

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Court Appointed Counsel