

**Voya Investment Management Co. LLC Form  
ADV Part 3: Relationship Summary  
March 28, 2024**

**Item 1. Introduction**

Voya Investment Management Co. LLC is registered with the U.S. Securities and Exchange Commission ("SEC") as an investment adviser. Clients and prospective clients should be aware that services and fees differ between investment advisers and broker-dealers and it is important for retail investors to understand the differences.

Free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2. Relationships and Services**

***What investment services and advice can you provide me?***

Through negotiated arrangements with certain brokerage firms, we manage accounts of retail investors under programs where retail investors pay a single fee to the brokerage firm which encompass our fees, certain transaction costs, custody, performance measurement and administrative costs ("Wrap Programs"). Under many of these Wrap Programs, we have an agreement only with the sponsor as a sub-adviser; in these cases, we typically receive a portion of the overall wrap fee from the Sponsor. In other cases, we also enter into an advisory relationship directly with the retail investor. Clients and prospective clients in Wrap Programs should carefully review the terms of the Wrap Program disclosure documents to understand the services, minimum account size, expenses, and other terms and conditions of such Wrap Program.

For discretionary Wrap Programs, we are granted discretionary management authority without any material limitations, and we are responsible for implementing securities transactions for each retail investor that are appropriate for the selected investment strategy (and, if relevant, in accordance with reasonable investment restrictions imposed by the investor and accepted by us). Where we have discretionary management authority, we must monitor the portfolio, investment strategy, and investments on an ongoing basis.

**Conversation Starters:** *Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

For additional information please see **Items 4 and 7** of our **Form ADV Part 2A. Item 3.**

**Fees, Costs, Conflicts and Standard of Conduct**

***What fees will I pay?***

Our investment advisory and management fees are calculated as a percentage of assets under management (calculated by us pursuant to certain valuation procedures) and are typically payable quarterly in arrears based on the quarter-end market value, although clients sometimes will also agree upon other billing arrangements.

In a Wrap Program, we receive from .125% to 1.00% in annual compensation, depending on the program sponsor, type of account (i.e., fixed income, equity, or balanced portfolio), the level of support services provided by the program sponsor, and the size of retail investors' assets in the specific program. A condition of some Wrap Programs is that transactions for retail investors' accounts are executed by the sponsor of the Wrap Program (or its affiliate). Where we contract directly with the wrap sponsor to provide investment advisory services, the wrap sponsor typically authorizes any payment of our fees. Where we contract directly with the retail investor to provide investment advisory services, we typically will send an invoice to the retail investor for payment of our advisory fees.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more information about the fees we charge and the other fees and expenses you will incur please see **Item 5** of our **Form ADV Part 2A.**

## Voya Investment Management Co. LLC Form ADV

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Conversation Starters: *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

***What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?***

**When we act as your investment adviser**, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. We have a financial incentive to offer or recommend that you invest in certain investments because they are issued, sponsored, or managed by us or our affiliates. Additionally, our financial professionals will receive additional compensation if you purchase these investments. For example, certain personnel of ours are also registered representatives of Voya Investments Distributor LLC, an affiliated broker dealer. These registered representatives receive compensation in connection with the sale of registered investment companies and other funds managed by us or our affiliates; these fees typically do not offset advisory fees. In addition, our personnel receive compensation pursuant to solicitation or similar arrangements with affiliated or unaffiliated advisers. Where an individual receives compensation of this nature, there is a conflict of interest because he or she has an incentive to recommend a product based on potential revenues rather than the client's needs. For more information about this conflict and our procedures to mitigate conflicts of interest, please see **Item 5** of our **Form ADV Part 2A**.

Conversation Starters: *How might your conflicts of interest affect me, and how will you address them?*

***How do your financial professionals make money?***

Our financial professionals are compensated by means of (i) a fixed base salary; (ii) a discretionary annual incentive bonus which is based on firm performance, individual performance, and team performance. Team performance includes the one, three, and five- year performance of the accounts for which such financial professionals are primarily and jointly responsible relative to benchmarks and peer performance, as well as contributions to our asset and revenue growth, and profitability; and (iii) long-term awards tied to the performance of our parent company, Voya Financial, Inc.

#### **Item 4. Disciplinary History**

***Do you or your financial professionals have a legal or disciplinary history?***

Yes, visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Conversation Starters: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

#### **Item 5. Additional Information**

Additional information about us and copies of our Form ADV Part 2A disclosure brochure and this relationship summary are available at [www.voyainvestments.com](http://www.voyainvestments.com). Additional information about us also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our CRD number is 106494. The SEC's web site also provides information about any persons affiliated with us who are registered, or are required to be registered, as our investment adviser representatives, as well as our disciplinary and other background information regarding us IM. For up-to-date information and to request a copy of this relationship summary, we can be reached by phone at (212) 309-8200.

Conversation Starters: *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*