The following is a description of the material changes to **Voya Investment**Management Co. LLC's Part 2A Brochure:

- Updates to Item 4 Advisory business and trading and outsourcing
- Updates to Item 6 Compliance procedures and Conflicts Committee
- Updates to Item 9 Commercial mortgage loan disclosures
- Updates to Item 10 Senior management changes
- Updates to Item 11 Code of ethics
- Updates to Item 12 Commercial mortgage loan services



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