ING Infrastructure, Industrials and Materials Fund

Closed-End Fund | Strategy Brief June | 2012

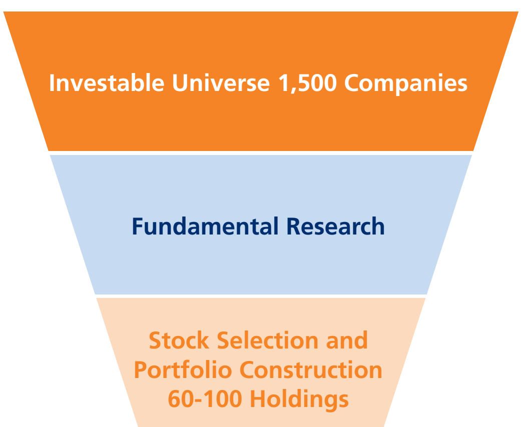
NYSE Symbol: IDE	**Inception Date:** 1/26/10
CUSIP #: 45685U100	**Inception NAV:** $19.06
NAV Symbol: XIDEX	**Inception Share Price:** $20.00

Fund Overview

Infrastructure Development	Seeks to focus on companies that will potentially benefit from increased government and private infrastructure spending.
Global Exposure	Global infrastructure related spending needs are estimated to be more than $40 trillion through 2030[2].
Broader View	Intends to invest in a broad range of companies from the infrastructure, industrials and materials sectors.

Equity Investment Process

- Seeks to identify through bottom-up fundamental research, companies whose revenues or growth in revenues will potentially benefit from infrastructure spending.
- Seeks to invest in companies that have good growth prospects, resilient earnings potential across market cycles, disciplined capital allocation management and a strong competitive position.
- Build a portfolio of 60 to 100 equity securities across six areas: power, construction, materials, communications, transportation and water.



Investment Objective[1]

- Seeks total return through a combination of current income, capital gains and capital appreciation.

Investment Strategy

- The Fund will seek to achieve its investment objective by investing in a wide range of companies primarily in the infrastructure, industrials and materials sectors, which our portfolio managers believe will benefit from the building, renovation, expansion and utilization of infrastructure.

Call Writing Strategy

- The Fund seeks to secure gains and enhance the stability of returns over a market cycle by writing (selling) call options on either (1) the value of subsets of stocks in its portfolio or (2) selected equity securities held in its portfolio, generally comprised of a portion of the Fund's large capitalization holdings; which will generally represent 15% to 50% of the total underlying value of the portfolio.

Diversified Investment Thesis

- Power: upgrades to electric generation, transmission and distribution infrastructure in the in developed markets, and many emerging markets as well as R&D and upgrades in renewable sources of power.
- Materials: unprecedented scale of urban growth in the developing world, particularly in Africa and Asia where the urban population will double between 2000 and 2030.
- Communications: network advances, under-penetration and easing regulatory constraints will create global opportunities.
- Transportation: by 2045, the world's population is expected to surge by 40% to 9 billion. This growth, coupled with globalization and trade liberalization, driving unprecedented demand for transportation of goods and people.
- Construction: Global economies, including those with established but aging infrastructure networks, face a gargantuan bill for deferred maintenance on roads, water systems, dams, bridges and electric grids.
- Water: by 2030, as many as 4 billion people will not have enough water for their basic needs, driving infrastructure investments in water storage, distribution, sanitation and waste management.

1 There can be no assurance that the Fund will achieve its investment objective.
2 Booz Allen Hamilton, Lights! Water! Motion!, 2007.

ING Infrastructure, Industrials and Materials Fund

Closed-End Fund | Strategy Brief **June | 2012**

Manager Commentary

Market Review

The global growth outlook deteriorated somewhat during the second quarter, due to increased weakness in Europe, slowing emerging economies and decelerating growth in the United States. Global markets fell sharply in April and May, due to the re-escalation of the European sovereign debt crisis and a visibly slowing global economy. Additional European supportive measures to aid Spain in particular, as well as monetary easing in China, helped to calm markets, which recovered some of the prior months' losses in the course of June. Cyclically sensitive sectors such as materials, consumer discretionary, financials, industrials and information technology bore the brunt of the correction, while defensive sectors such as telecommunication services, health care and consumer staples eked out marginal gains. Energy stocks were also relatively weak. The weakness was broad-based, with emerging markets underperforming developed markets and North American stocks being the least impacted.

Equity Portfolio

This market backdrop was problematic for our thematic approach, which sources the bulk of its holdings from the industrials and materials sectors. Within these sectors, the emphasis on infrastructure-related spending also constituted a headwind. Security selection consequently lost value, especially in industrials, but also in telecommunication services and utilities. In contrast, modest value was added in materials. The majority of the shortfall was generated in North America and, to a lesser extent, in Europe. Based on the six themes according to which the Fund stratifies its investment universe (communications, construction, food and water, materials, power and transportation), stock selection was especially negatively impacted in the power and construction components of the portfolio.

Options Portfolio

The Fund generates premiums and seeks gains by writing (selling) call options on a basket of equity names on a portion of the value of the equity portfolio. The strike prices of the options written were typically at or near the money, and the average expiration dates were between four and five weeks. The coverage ratio was maintained at approximately 35% throughout the period. For the quarter, the Fund's option strategy had a positive impact on relative returns, as most of the option contracts expired out-the-money or marginally in the money while premiums received were considerably more than the amounts requiring to be settled on the expiration dates. Premiums benefited from a volatility spike in the middle of the quarter in tandem with falling markets; volatility fell at the end of the quarter as markets recovered.

Outlook and Strategy

The global growth outlook remains fragile and is mainly contingent on cushioning the European recession and the success of the recently announced monetary easing measures in China. While Europe has taken considerable steps to strengthen its banking sector we think much more is necessary to stabilize the intensifying recession. We remain hopeful that the European economy will stabilize by year-end and recover modestly in 2013. On a more positive note, recent data releases have heightened the probability of a soft economic landing in China. Global economic and market prospects could, on this basis, improve somewhat as we head into 2013. For the coming months, however, we expect markets to remain nervous and volatile before confidence returns later in the year. Longer-term, emerging economies continue to have an acute need (and the resources) to accelerate infrastructure development, which suggests that the Fund's theme remains well positioned. Companies linked to infrastructure spending continue, we believe, to be well positioned for above average growth in a global market where secular growth in the developed world is relatively scarce. In our view, continued market volatility is likely to be reflected in attractive levels of premiums the Fund may potentially receive on its call writing activities.

Performance

For the quarter ended June 30, 2012, the ING Infrastructure Industrials and Materials Fund returned -8.39% on a net asset value basis and -8.48% on a market value basis. The Fund's reference index, the MSCI All Country World Index, returned -6.36% for the same period.

Past performance is no guarantee of future results. The performance quoted represents past performance. Investment return and principal value of an investment will fluctuate, and shares, when redeemed, may be worth more or less than their original cost. Current performance may be lower or higher than the performance data quoted.

Principal Risks: Market Discount Risk-Shares of closed-end management investment companies frequently trade at a discount to their net asset value (NAV), and the Fund's Common Shares may likewise trade at a discount to their NAV. The trading price of the Fund's Common Shares may be less than the public offering price at any point in time. Common Shareholders who sell their shares within a relatively short period after completion of the public offering are likely to be exposed to this risk. Accordingly, the Common Shares are designed primarily for long-term investors, and investors in the Common Shares should not view the Fund as a vehicle for trading purposes. **Infrastructure-Related Investment Risk.** Because the Fund invests in infrastructure companies, it has greater exposure to potentially adverse economic, regulatory, political and other changes affecting such companies. Infrastructure companies are subject to a variety of factors that may adversely affect their business or operations including interest rates and costs in connection with capital construction projects, costs associated with environmental and other regulations, the effects of economic slowdowns, surplus capacity, increased competition from other suppliers of services, uncertainties concerning the availability of necessary fuels, energy costs, the effects of energy conservation policies and other factors. **Infrastructure companies may be subject to the following additional risks: Regulatory Risk, Technology Risk, Regional or Geographic Risk, Natural Disasters Risk, Through-Put Risk, Project Risk, Strategic Asset Risk, Operation Risk, Customer Risk, Interest Rate Risk and Inflation Risk. Regulatory Risk:** Infrastructure companies may be subject to regulation by various governmental authorities and may also be affected by governmental regulation of rates charged to services, the imposition of special tariffs and changes in tax laws, environmental laws and regulations, regulatory policies, accounting standards and general changes in market sentiment towards infrastructure assets. Infrastructure companies' inability to predict, influence or respond appropriately to changes in law or regulatory schemes could adversely impact their results of operations. **Industrials Sector Risk:** The industrials sector can be significantly affected by general economic trends, including employment, economic growth, and interest rates, changes in consumer sentiment and spending, the supply of and demand for specific industrial and energy products or services, commodity prices, legislation, government regulation and spending, import controls, and worldwide competition. For example, commodity price declines and unit volume reductions resulting from an over-supply of materials used in industrials and energy equipment & services industries can adversely affect those industries. Furthermore, a company in the industrials sector can be subject to liability for environmental damage, depletion of resources, and mandated expenditures for safety and pollution control. **Materials Sector Risk:** The materials sector can be significantly affected by the level and volatility of commodity prices, the exchange value of the dollar, import controls, and worldwide competition. At times, worldwide production of materials has exceeded demand as a result of over-building or economic downturns, which has led to commodity price declines and unit price reductions. Companies in the materials industries can also be adversely affected by liability for environmental damage, depletion of resources, mandated expenditures for safety and pollution control, labor relations, and government regulations. **Option Risks:** There are numerous risks associated with transactions in options. A decision as to whether, when and how to write call options under the Fund's strategy involves the exercise of skill and judgment, and even a well-conceived transaction may be unsuccessful to some degree because of market behavior or unexpected events. When a call option sold by the Fund is exercised or closed out, the Fund may be required to sell portfolio securities or to deliver portfolio securities to the option purchaser to satisfy its obligations when it would not otherwise choose to do so, or the Fund may choose to sell portfolio securities to realize gains to offset the losses realized upon option exercise. Such sales or delivery would involve transaction costs borne by the Fund and may also result in realization of taxable capital gains, including short-term capital gains taxed at ordinary income tax rates, and may adversely impact the Fund's after-tax returns. The Fund cannot guarantee that its call option strategy will be effective. **Issuer Risk:** The value of securities held by the Fund may decline for a number of reasons that directly relate to the issuer, such as changes in the financial condition of the issuer, management performance, financial leverage and reduced demand for the issuer's goods and services. The amount of dividends paid may decline for reasons that relate to an issuer, such as changes in an issuer's financial condition or a decision by the issuer to pay a lower dividend. In addition, there may be limited public information available for the Sub-Adviser to evaluate foreign issuers. **The Fund may also be subject to the following categories of risk: Foreign Investment and Emerging Markets Risk, Equity Risk, Small-Cap and Mid-Cap Companies Risk, Investment and Market Risk, Derivatives Risk, Interest Rate Risk, Illiquid Securities Risk, Distribution Risk, Tax Risk, Foreign (non-U.S.) Currency Risk, Portfolio Turnover Risk, Management Risk, Initial Public Offering Risk, Depositary Receipts Risk, Securities Lending Risk, Market Disruption and Geopolitical Risk, Current Capital Markets Environment Risk, Anti-Takeover Provisions, No Temporary Defensive Positions Risk, Sub-Custody Risk, Short Sales Risk, Preferred Stock Risk, Convertible Securities Risk, High-Yield Lower-Grade Debt Securities Risk and Leverage Risk. For a complete listing of all the Fund's risks with their descriptions, please refer to the Prospectus.**

(800) 992-0180 Individual Investors • (800) 334-3444 Investment Professionals