



Managing Fiduciary Responsibility

Checklist

At least annually, review how well your plan meets each guideline on this checklist to help manage your fiduciary responsibility as a plan sponsor.

Document your investment policy statement

- Create and maintain a written document, monitor it and follow it.
- Select prudent investments.
- Periodically review your investment policy statement and investment options.

Select investment options

- Select a group of prudent investments that helps the plan meet 404(c) requirements.
- Offer at least three “core” investments with materially different risk and return characteristics.
- Designate a default fund that meets the requirements of a qualified default investment alternative (QDIA).
- Allow participants to build portfolios from the investment menu with risk and return characteristics suited to individual situations.
- Permit participants to transfer among core investments at least every three months.
- Explain plan provisions and investment options to participants.

Notify participants that yours is a 404(c) plan and provide disclosures

- Explain that your plan voluntarily complies with 404(c) and that plan fiduciaries may be relieved of liability for investment losses.
- Explain procedures and limitations for giving investment instructions.
- Identify the fiduciary responsible for providing 404(c) disclosure information.
- Explain employees' voting rights and restrictions.
- Disclose transaction fees and expenses, including commissions and sales loads.
- Describe information that is available on request.

Explain investment options to plan participants

- Describe investment options, including objectives and risk and return characteristics.
- Provide printed or online copies of fund prospectuses either immediately before or after initial investment.

Educate employees about retirement planning

- Explain the benefits of participating.
- Provide general financial planning and investment information.
- Use asset allocation models for participants with varying risk tolerances and time horizons.
- Use interactive materials (worksheets, questionnaires, software, etc.) to help participants estimate retirement income needs and assess the effect of various asset allocations on those needs.
- Maintain records of all education efforts.

Consider adding a corporate trustee to your retirement plan for overall plan assistance and additional fiduciary protection.

Please note

This checklist is an overview to help you get started with the management of your fiduciary responsibility.

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Consider the investment objectives, risks, and charges and expenses carefully. For this and other information about AIM funds, obtain a prospectus from your financial advisor and read it carefully before investing.

Note: Not all products, materials or services available through all firms. Advisors, please contact your home office.

Asset allocation/diversification does not guarantee a profit or eliminate the risk of loss.

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Supplemental Information

As of Sept. 30, 2009, Invesco Aim's assets under management were approximately \$157 billion and Invesco Ltd.'s assets under management were approximately \$417 billion.

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