

**Voya Investments Distributor, LLC, a
FINRA-Registered Broker-Dealer
Customer Relationship Summary
November 12, 2025**

Item 1: Introduction:

Voya Investments Distributor, LLC is a FINRA-registered broker-dealer. Clients and prospective clients should be aware that services and fees differ between broker-dealers and investment advisers and it is important for retail investors to understand the differences.

Free, simple tools are available to research firms and financial professionals at 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?

We are primarily a distributing broker-dealer and offer a very limited range of brokerage accounts and services to retail investors. The only investments we offer directly to retail investors are shares of the Pomona Investment Fund, a closed-end mutual fund. Except for the Pomona Investment Fund, we do not directly market or make recommendations to retail investors regarding the open-end and closed-end mutual funds or the 529 College Savings Plans which we distribute through third-party broker-dealers who access our mutual funds and 529 Plans so that they can offer them to their retail clients.

This document gives you a summary of the types of services we provide and how you pay. Please ask us for more information.

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?

Item 3. Fees and Costs – What Fees and Costs will I pay?

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. Please ask your financial professional to give you personalized information on the fees and costs that you may pay.

If you purchase shares of the Pomona Investment Fund or any other Voya mutual fund (collectively the "Funds") from us in our broker-dealer capacity, we may receive a commission at the time of purchase and we may receive ongoing compensation (commonly known as "trails" or Rule 12b-1 fees), which is typically paid from the assets of the investment product under a distribution or servicing arrangement between us and the Funds and is calculated as an annual percentage of assets invested by Fund customers. In these cases, the more assets you invest in

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the product, the more we will be paid in these fees. Therefore, we may have an incentive to encourage you to increase the size of your investment.

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? For more detailed information on the types and amounts of fees we receive and costs you may incur, please refer to the prospectus for any Fund in which you plan to invest.

Item 4. Standards of Conduct:

We must abide by certain laws and regulations in our interactions with you. When making investment recommendations to you in connection with the Pomona Investment Fund, we are required to act in your best interest and not put our interest ahead of yours. However, once we make a recommendation in connection with your brokerage account, we do not perform ongoing monitoring of your account, nor do we make ongoing buy, sell, or hold recommendations. You may select investments or we may recommend investments in the Pomona Investment Fund, but the ultimate decision for your investment strategy and the purchase and sale of investments will be yours. Since you will pay transaction-based fees in a brokerage account, the more trades in your account, the more fees we will charge you. So we have an incentive to encourage you to trade often.

Our interests may conflict with your interests. We must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether or not to agree to them. We benefit from the brokerage services we provide to you. 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 and we share with them a portion of the revenue we earn from those investments. Additionally, our financial professionals will receive additional compensation if you purchase these investments and personnel of ours may receive compensation pursuant to solicitation or similar arrangements that we have with affiliated or unaffiliated advisers.

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

Item 5. Disciplinary History - Do you or your financial professionals have legal or disciplinary history?

Yes, we do - visit www.Investor.gov for a free and simple search tool to research our firm and our financial professionals.

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

Item 6. Additional Information:

We encourage you to seek out additional information. Visit www.Investor.gov for a free and simple search tool to research our firm and our financial professionals. To report a problem to the SEC or FINRA, visit www.Investor.gov, the SEC's toll-free investor assistance line at (800) 732-0330 or contact FINRA's Complaint Center at <https://www.finra.org/investors/have-problem/file-complaint/complaint-center>

If you have a problem with your investments, investment account or a financial professional, you can contact us in writing at Voya Investments Distributor, LLC, 200 Park Avenue, New York, NY 10166.

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?*