

Edgar Filing: Voya Emerging Markets High Dividend Equity Fund - Form 40-17F2

Voya Emerging Markets High Dividend Equity Fund  
Form 40-17F2  
October 08, 2014

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549**

**FORM N-17f-2**

Certificate of Accounting of Securities and Similar  
Investments in the Custody of  
Management Investment Companies

OMB APPROVAL  
OMB Number: 3235-0360  
Expires: January 31, 2015  
Estimated average burden  
hours per response.....7.2

Pursuant to Rule 17f-2 [17 CFR 270.17f-2]

1. Investment Company Act File Number:

**811-22438**

Date examination completed:

**October 6, 2014**

2. State identification Number: N/A

AL	AK	AZ	AR	CA	CO
CT	DE	DC	FL	GA	HI
ID	IL	IN	IA	KS	KY
LA	ME	MD	MA	MI	MN
MS	MO	MT	NE	NV	NH
NJ	NM	NY	NC	ND	OH
OK	OR	PA	RI	SC	SD
TN	TX	UT	VT	VA	WA
WV	WI	WY	PUERTO RICO		

Other (specify):

3. Exact name of investment company as specified in registration statement:

**Voya Emerging Markets High Dividend Equity Fund**

4. Address of principal executive office (number, street, city, state, zip code):

**7337 E. Doubletree Ranch Road, Suite 100, Scottsdale, AZ 85258**

**INSTRUCTIONS**

This Form must be completed by investment companies that have custody of securities or similar investments.

**Investment Company**

1. All items must be completed by the investment company.

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2. Give this Form to the independent public accountant who, in compliance with Rule 17f-2 under the Act and applicable state law, examines securities and similar investments in the custody of the investment company.

**Accountant**

3. Submit this Form to the Securities and Exchange Commission and appropriate state securities administrators when filing the certificate of accounting required by Rule 17f-2 under the Act and applicable state law. File the original and one copy with the Securities and Exchange Commission's principal office in Washington, D.C., one copy with the regional office for the region in which the investment company's principal business operations are conducted, and one copy with the appropriate state administrator(s), if applicable.

**THIS FORM MUST BE GIVEN TO YOUR INDEPENDENT PUBLIC ACCOUNTANT**

SEC2198 (10-03)

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**SEC's Collection of Information**

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Filing of Form N-17f-2 is mandatory for an investment company that has custody of securities or similar investments. Rule 17f-2 under section 17(f) of the Investment Company Act of 1940 requires the investment company to retain an independent public accountant to verify the company's securities and similar investments by actual examination three times during each fiscal year. The accountant must prepare a certificate stating that the examination has occurred and describing the examination, and must transmit the certificate to the Commission with Form N-17f-2 as a cover sheet. The Commission uses the Form to ensure that the certificate is properly attributed to the investment company. The Commission estimates that the burden of completing Form N-17f-2 is approximately 1.0 hours per filing. Any member of the public may direct to the Commission any comments concerning the accuracy of the burden estimate of this Form, and any suggestions for reducing this burden. This collection of information has been reviewed by the Office of Management and Budget in accordance with the clearance requirements of 44 U.S.C. § 3507. Responses to this collection of information will not be kept confidential.

**Report of Independent Registered Public Accounting Firm**

To the Board of Trustees

Voya Emerging Markets High Dividend Equity Fund (formerly ING Emerging Markets High Dividend Equity Fund)

We have examined management's assertion, included in the accompanying management statement regarding compliance with certain provisions of the Investment Company Act of 1940 (the Act), that Voya Emerging Markets High Dividend Equity Fund (the Fund) complied with the applicable requirements of subsections (b) and (c) of rule 17f-2 under the Act with respect to the securities held by affiliated sub-custodian banks pursuant to rule 17f-5 of the Act as of February 28, 2013. Management is responsible for the Fund's compliance with those requirements. Our responsibility is to express an opinion on management's assertion about the Fund's compliance based on our examination.

Our examination was conducted in accordance with the attestation standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included examining, on a test basis, evidence about the Fund's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. Included among our procedures were the following tests performed as of February 28, 2013, and with respect to agreement of security purchases and sales, for the period September 30, 2012 (date of our last examination) through February 28, 2013:

- Confirmation of all securities held in book entry form by The Bank of New York Mellon (custodian);
  
- Confirmation of securities held in book entry form by ING Bank N.V. Prague, ING Bank Slaski and ING Bank RT Budapest (affiliated sub-custodian banks);
  
- Confirmation of securities held in book entry form by Czech Securities Centre, Polish National Depository of Securities and Hungary Central Securities Depository (KELER) (foreign depositories);
  
- Confirmation or inspection of documentation of all securities purchased but not received, hypothecated, pledged, placed in escrow, or out for transfer with brokers, pledges and/or transfer agents;
  
- Reconciliation of all such securities to the books and records of the Fund, the custodian and the affiliated sub-custodian banks;
  
- Agreement of selected security purchases and sales during the period of September 30, 2012 through February 28, 2013 from the books and records of the Fund to broker confirmations or bank statements;

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- Obtained and considered the agreed-upon procedures report issued by Ernst and Young for the affiliated sub-custodian bank, ING Bank Eurasia ZAO.
  
  - Review of the BNY Mellon Asset Servicing Custody and Securities Lending Services Service Organization Control Report ( SOC 1 Report ) for the period October 1, 2012 to September 30, 2013 and noted no relevant findings were reported in the areas of Asset Custody and Control.
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We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on the Fund's compliance with the specified requirements.

In our opinion, management's assertion that the Fund complied with the applicable requirements of subsections (b) and (c) of rule 17f-2 of the Act as of February 28, 2013, with respect to the securities reflected in the investment accounts of the Fund that are held by the affiliated sub-custodian banks pursuant to rule 17f-5 of the Act, is fairly stated, in all material respects. We have not examined the Fund's compliance with rule 17f-5 of the Act and express no opinion thereon.

This report is intended solely for the information and use of management, the Board of Trustees of the Fund, and the Securities and Exchange Commission, and is not intended to be and should not be used by anyone other than these specified parties.

(signed) KPMG LLP

Boston, Massachusetts

October 6, 2014

**Report of Independent Registered Public Accounting Firm**

To the Board of Trustees

Voya Emerging Markets High Dividend Equity Fund (formerly ING Emerging Markets High Dividend Equity Fund)

We have examined management's assertion, included in the accompanying management statement regarding compliance with certain provisions of the Investment Company Act of 1940 (the Act), that Voya Emerging Markets High Dividend Equity Fund (the Fund) complied with the applicable requirements of subsections (b) and (c) of rule 17f-2 under the Act with respect to the securities held by affiliated sub-custodian banks pursuant to rule 17f-5 of the Act as of July 31, 2013. Management is responsible for the Fund's compliance with those requirements. Our responsibility is to express an opinion on management's assertion about the Fund's compliance based on our examination.

Our examination was conducted in accordance with the attestation standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included examining, on a test basis, evidence about the Fund's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. Included among our procedures were the following tests performed as of July 31, 2013, and with respect to agreement of security purchases and sales, for the period February 28, 2013 (date of our last examination) through July 31, 2013:

- Confirmation of all securities held in book entry form by The Bank of New York Mellon (custodian);
  
- Confirmation of securities held in book entry form by ING Bank N.V. Prague, ING Bank Slaski and ING Bank RT Budapest (affiliated sub-custodian banks);
  
- Confirmation of securities held in book entry form by Czech Securities Centre, Polish National Depository of Securities and Hungary Central Securities Depository (KELER) (foreign depositories);
  
- Confirmation or inspection of documentation of all securities purchased but not received, hypothecated, pledged, placed in escrow, or out for transfer with brokers, pledges and/or transfer agents;
  
- Reconciliation of all such securities to the books and records of the Fund, the custodian and the affiliated sub-custodian banks;
  
- Agreement of selected security purchases and sales during the period of February 28, 2013 through July 31, 2013 from the books and records of the Fund to broker confirmations or bank statements;

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- Obtained and considered the agreed-upon procedures report issued by Ernst and Young for the affiliated sub-custodian bank, ING Bank Eurasia ZAO.
  
  - Review of the BNY Mellon Asset Servicing Custody and Securities Lending Services Service Organization Control Report ( SOC 1 Report ) for the period October 1, 2012 to September 30, 2013 and noted no relevant findings were reported in the areas of Asset Custody and Control.
-

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We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on the Fund's compliance with the specified requirements.

In our opinion, management's assertion that the Fund complied with the applicable requirements of subsections (b) and (c) of rule 17f-2 of the Act as of July 31, 2013, with respect to the securities reflected in the investment accounts of the Fund that are held by the affiliated sub-custodian banks pursuant to rule 17f-5 of the Act, is fairly stated, in all material respects. We have not examined the Fund's compliance with rule 17f-5 of the Act and express no opinion thereon.

This report is intended solely for the information and use of management, the Board of Trustees of the Fund, and the Securities and Exchange Commission, and is not intended to be and should not be used by anyone other than these specified parties.

(signed) KPMG LLP

Boston, Massachusetts

October 6, 2014

**Report of Independent Registered Public Accounting Firm**

To the Board of Trustees

Voya Emerging Markets High Dividend Equity Fund (formerly ING Emerging Markets High Dividend Equity Fund)

We have examined management's assertion, included in the accompanying management statement regarding compliance with certain provisions of the Investment Company Act of 1940 (the Act), that Voya Emerging Markets High Dividend Equity Fund (the Fund) complied with the applicable requirements of subsections (b) and (c) of rule 17f-2 under the Act with respect to the securities held by affiliated sub-custodian banks pursuant to rule 17f-5 of the Act as of October 31, 2013. Management is responsible for the Fund's compliance with those requirements. Our responsibility is to express an opinion on management's assertion about the Fund's compliance based on our examination.

Our examination was conducted in accordance with the attestation standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included examining, on a test basis, evidence about the Fund's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. Included among our procedures were the following tests performed as of October 31, 2013, and with respect to agreement of security purchases and sales, for the period July 31, 2013 (date of our last examination) through October 31, 2013:

- Confirmation of all securities held in book entry form by The Bank of New York Mellon (custodian);
  
- Confirmation of securities held in book entry form by ING Bank N.V. Prague, ING Bank Slaski and ING Bank RT Budapest (affiliated sub-custodian banks);
  
- Confirmation of securities held in book entry form by Czech Securities Centre, Polish National Depository of Securities and Hungary Central Securities Depository (KELER) (foreign depositories);
  
- Confirmation or inspection of documentation of all securities purchased but not received, hypothecated, pledged, placed in escrow, or out for transfer with brokers, pledges and/or transfer agents;
  
- Reconciliation of all such securities to the books and records of the Fund, the custodian and the affiliated sub-custodian banks;
  
- Agreement of selected security purchases and sales during the period of July 31, 2013 through October 31, 2013 from the books and records of the Fund to broker confirmations or bank statements;

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- Obtained and considered the agreed-upon procedures report issued by Ernst and Young for the affiliated sub-custodian bank, ING Bank Eurasia ZAO.
  
  - Review of the BNY Mellon Asset Servicing Custody and Securities Lending Services Service Organization Control Report ( SOC 1 Report ) for the period July 1, 2013 to June 30, 2014 and noted no relevant findings were reported in the areas of Asset Custody and Control.
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We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on the Fund's compliance with the specified requirements.

In our opinion, management's assertion that the Fund complied with the applicable requirements of subsections (b) and (c) of rule 17f-2 of the Act as of October 31, 2013, with respect to the securities reflected in the investment accounts of the Fund that are held by the affiliated sub-custodian banks pursuant to rule 17f-5 of the Act, is fairly stated, in all material respects. We have not examined the Fund's compliance with rule 17f-5 of the Act and express no opinion thereon.

This report is intended solely for the information and use of management, the Board of Trustees of the Fund, and the Securities and Exchange Commission, and is not intended to be and should not be used by anyone other than these specified parties.

(signed) KPMG LLP

Boston, Massachusetts

October 6, 2014

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August 28, 2014

KPMG LLP

Attention: Dan Strasshofer

Two Financial Center

60 South Street

Boston, MA 02111

RE: Management Statement Regarding Compliance with Certain Provisions of the Investment Company Act of 1940

Ladies and Gentlemen:

We, as members of management of the Voya funds (formerly known as the ING Funds) listed in Appendix A (the Funds), are responsible for complying with the requirements of subsections (b) and (c) of rule 17f-2, Custody of Investments by Registered Management Investment Company, of the Investment Company Act of 1940. We are also responsible for establishing and maintaining effective internal controls over compliance with those requirements. We have performed an evaluation of the Funds' compliance with the requirements of subsections (b) and (c) of rule 17f-2 as of February 28, 2013, July 31, 2013, and October 31, 2013, and for the period from October 1, 2012 through October 31, 2013.

Based on this evaluation, we assert that the Funds were in compliance with the applicable requirements of subsections (b) and (c) of rule 17f-2 of the Investment Company Act of 1940 as of February 28, 2013, July 31, 2013, and October 31, 2013, and for the period from October 1, 2012 through October 31, 2013 with respect to securities reflected in the investment accounts of the Funds that are held by affiliated foreign sub-custodians. We note that all affiliated sub-custodians that maintained assets of the Funds during the applicable period qualified as Eligible Foreign Custodians under rule 17f-5.

Very truly yours,

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Voya funds

/s/ Shaun P. Mathews  
Shaun P. Mathews  
*Chief Executive Officer*

/s/ Todd Modic  
Todd Modic  
*Senior Vice President and Chief Financial Officer*

7337 E. Doubletree Ranch Rd Suite 100 Scottsdale, AZ 85258

[www.voyainvestments.com](http://www.voyainvestments.com)

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**Appendix A**

Voya Balanced Portfolio (formerly ING Balanced Portfolio)

Voya Emerging Markets Equity Dividend Fund (formerly ING Emerging Markets Equity Dividend Fund)

Voya Emerging Markets Equity Fund (formerly ING Emerging Markets Equity Fund)

Voya Emerging Markets High Dividend Equity Fund (formerly ING Emerging Markets High Dividend Equity Fund)

Voya Emerging Markets Index Portfolio (formerly ING Emerging Markets Index Portfolio)

Voya Emerging Markets Local Currency Debt Fund (formerly ING Emerging Markets Local Currency Debt Fund)

Voya Global Advantage and Premium Opportunity Fund (formerly ING Global Advantage and Premium Opportunity Fund)

Voya Global Bond Fund (formerly ING Global Bond Fund)

Voya Global Bond Portfolio (formerly ING Global Bond Portfolio)

Voya Global Opportunities Fund (formerly ING Global Opportunities Funds)

Voya Global Value Advantage Portfolio (formerly ING Global Value Advantage Portfolio)

Voya Intermediate Bond Fund (formerly ING Intermediate Bond Fund)

Voya International Core Fund (formerly ING International Core Fund)

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Voya International Small Cap Fund (formerly ING International Small Cap Fund)

VY JPMorgan Emerging Markets Equity Portfolio (formerly ING JP Morgan Emerging Markets Equity Portfolio)

VY MFS Utilities Portfolio (formerly ING MFS Utilities Portfolio)

Voya Russia Fund (formerly ING Russia Fund)

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