

**Sustainability Accounting Standards Board (SASB) Commercial Banks (FN-CB) Standard**

Disclosure Topic	Accounting Metric*	Metric Code	Disclosure reference
Systemic Risk Management	Global Systemically Important Bank (G-SIB) score, by category	FN-CB-550a.1	ING Bank Additional Pillar III Report 2020 - Navigation map
	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	FN-CB-550a.2	ING Group Annual Report 2020 - Risk Management - Stress testing ING Group Annual Report 2020 - Risk Management - Environmental, social and governance risk <a href="#">2020 Climate Risk Report - p.16 (Stress testing)</a> ING Group Annual Report 2020 - Risk Management - Environmental, social and governance risk - TCFD
Incorporation of ESG Factors in Credit Analysis	Commercial and industrial credit exposure, by industry	FN-CB-410a.1	ING Group Annual Report 2020 - Risk Management - Credit risk portfolio per economic sector and application of ESR framework: <a href="#">ING lending portfolio overview (NAICS 4 Digit Subsector)</a>
	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	FN-CB-410a.2	ING Group Annual Report 2020 - Risk Management - Environmental, social and governance risk ING Group Annual Report 2020 - Non-financial appendix - ESR policy in practice, Responsible finance; UNEP FI Principles for Responsible Banking <a href="#">ING Equator Principles reporting</a> <a href="#">ING Environmental and Social Risk (ESR) policy framework</a> ING Group Annual Report 2020 - Our business - Responsible finance <a href="#">Our stance on ESG topics</a> ING Group Annual Report 2020 - Risk Management - Credit risk portfolio per economic sector and application of 2020 Climate Risk Report - p.14-17 (scenario analysis and stress testing) and p.32
Data security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	FN-CB-230a.1	ING Group Annual Report 2020- How we make a difference - Cybercrime resilience
	Description of approach to identifying and addressing data security risks	FN-CF-230a.2	ING Group Annual Report 2020 - How we make a difference - Cybercrime resilience ING Group Annual Report 2020 - Risk management - Cybercrime
Financial Inclusion and Capacity Building	N/A	N/A	In line with the SASB Application Guidance, the topic of Financial Inclusion and Capacity Building and its associated metrics were omitted based on the lack of applicability. Please refer to our approach to financial <a href="https://www.ing.com/Sustainability/Sustainability-direction/Financial-health.htm">https://www.ing.com/Sustainability/Sustainability-direction/Financial-health.htm</a>
Business ethics	Total amount of monetary losses as a result of legal proceedings	FN-CB-	ING Group Annual Report 2020 - Consolidated financial statements - Note 46 Legal proceedings
	Description of whistleblower policies and procedures	510a.2	ING Bank Additional Pillar III Report 2020 - Whistleblower; <a href="#">Whistleblower policy, available at ing.com/About-us/Compliance/Whistleblower-Policy.htm</a> <a href="#">ING complaints procedure: https://www.ing.com/About-us/Compliance/Complaints.htm</a>

**Global Reporting Initiative (GRI) Standards: Core**

Standard	Disclosure	Chapter and section reference in ING Annual Report 2020 unless stated otherwise	Direct Disclosure or Reason for Omission
<b>GRI 102: GENERAL DISCLOSURES</b>			
<b>1. Organizational profile</b>			
102-1	Name of the organization	Report front cover Corporate Governance	
102-2	Activities, brands, products, and services	Our business - Our markets	To the best of our knowledge, ING did not sell any banned or disputed products in 2020.
102-3	Location of the organization's headquarters		Our headquarters are located at: Bijlmerdreef 106 1102CT Amsterdam
102-4	Number of countries operating	<a href="https://www.ing.com/About-us/Profile/ING-at-a-glance.htm">https://www.ing.com/About-us/Profile/ING-at-a-glance.htm</a>	
102-5	Nature of ownership and legal form	Corporate Governance (introduction)	
102-6	Markets served	<a href="https://www.ing.com/About-us/Profile/ING-at-a-glance.htm">https://www.ing.com/About-us/Profile/ING-at-a-glance.htm</a> Our business - Our markets	
102-7	Scale of the reporting organization	<a href="https://www.ing.com/About-us/Profile/ING-at-a-glance.htm">https://www.ing.com/About-us/Profile/ING-at-a-glance.htm</a> Non-Financial Appendix - Our People	
102-8	Information on employees and other workers	Non-Financial Appendix - Our people	
102-9	Supply chain		As a financial services provider, the main elements of our supply chain are related to products and services that support our operations. These includes facility services and logistics, building maintenance and projects, IT systems - hardware and software, insurance, lease cars and business travel, marketing and communications support and other professional services. We disclose our policy and progress in the area of sustainable procurement in the Non-financial appendix.
102-10	Significant changes to the organization and its supply chain		In 2020 there have been no significant changes.

102-11	Precautionary Principle or approach	Risk Management - Environmental, social and governance risk	
102-12	External initiatives	Strategy and performance - World around us - Climate Change Risk management - Environmental, social and governance risk <a href="https://www.ing.com/Sustainability/Sustainability-direction/Climate-action.htm">https://www.ing.com/Sustainability/Sustainability-direction/Climate-action.htm</a>	
102-13	Memberships of associations	Non-financial appendix - Stakeholder engagement, engagement cases <a href="https://www.ing.com/Sustainability/The-world-around-us-1/Memberships.htm">https://www.ing.com/Sustainability/The-world-around-us-1/Memberships.htm</a>	
<b>2. Strategy</b>			
102-14	Statement from senior decision-maker	Word from our CEO	
<b>3. Ethics and integrity</b>			
102-16	Values, principles, standards, and norms of behavior	The world around us - Culture and integrity Our People - Orange Code and Code of Conduct	
<b>4. Governance</b>			
102-18	Governance structure	Corporate Governance <a href="https://www.ing.com/About-us/Corporate-governance.htm">https://www.ing.com/About-us/Corporate-governance.htm</a> <a href="https://www.ing.com/Sustainability/Sustainability-direction/Sustainability-governance.htm">https://www.ing.com/Sustainability/Sustainability-direction/Sustainability-governance.htm</a>	
<b>5. Stakeholder Engagement</b>			
102-40	List of stakeholder groups	Corporate governance - continuous dialogue with stakeholders Non-financial appendix - Stakeholder engagement Risk management - Environmental, social and governance risk - Developing intl. best practice and stakeholder engagement	
102-41	Collective bargaining agreements	Non-financial appendix	
102-42	Identifying and selecting stakeholders	Non-financial appendix - Stakeholder engagement <a href="https://www.ing.com/Sustainability/The-world-around-us-1/How-we-engage.htm">https://www.ing.com/Sustainability/The-world-around-us-1/How-we-engage.htm</a>	
102-43	Approach to stakeholder engagement	Non-financial appendix - Stakeholder engagement	
102-44	Key topics and concerns raised	Non-financial appendix - Stakeholder engagement, engagement cases	
<b>6. Reporting practice</b>			
102-45	Entities included in the consolidated financial statements	Consolidated annual accounts	
102-46	Defining report content and topic Boundaries	About this report Non-financial appendix - Understanding what matters most	
102-47	List of material topics	World around us - Material topics 2020	
102-48	Restatements of information		There have been no restatements
102-49	Changes in reporting	Non-financial appendix - Understanding what matters most	
102-50	Reporting period	About this report	
102-51	Date of most recent report	About this report	
102-52	Reporting cycle	About this report	
102-53	Contact point for questions regarding the report	About this report	
102-54	Claims of reporting in accordance with the GRI Standards	About this report	
102-55	GRI content index	GRI Content Index	
102-56	External assurance	About this report - Assurance Assurance report of the independent auditor Corporate Governance - External auditor	
<b>Topic Specific Standards</b>			
<b>Material topic: Financial performance</b>			
DMA	Disclosure on management approach	CEO statement Our strategy and how we create value Corporate governance Consolidated annual accounts	
201-1	Direct economic value generated and distributed	Consolidated annual accounts	
SASB FN-CB-550a.1.	Global Systemically Important Bank (G-SIB) score, by category	See SASB index table	
<b>Material topic: Climate resilience</b>			
GRI 305: EMISSIONS	Disclosure on management approach	Our business - Responsible finance	

		<a href="#">Climate risk report 2020</a> <a href="#">Terra progress report 2020</a> Risk Management – Environmental, social and governance risk <a href="https://www.ing.com/Sustainability/Sustainability-direction/Sustainability-governance.htm">https://www.ing.com/Sustainability/Sustainability-direction/Sustainability-governance.htm</a> Non-Financial Appendix – Environmental programme Non-Financial Appendix – Carbon emissions data	
305-1	Direct greenhouse gas (GHG) emissions (Scope 1)	Non-Financial Appendix – Carbon emissions data	
305-2	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	Non-Financial Appendix – Carbon emissions data	
305-3	Other indirect (Scope 3) GHG emissions	Non-Financial Appendix – Carbon emissions data  <a href="#">Terra progress report 2020</a>	ING reports its absolute Scope 3 emissions resulting from business travel by air and car. Furthermore, in the 2020 Terra Progress report we report the decarbonisation results of ING's loan book using pathways based on CO2 intensity. This is also included in the below ING indicator 'Lending portfolio CO2 intensity'.
305-5	Reduction of GHG emissions	Non-Financial Appendix – Carbon emissions data  <a href="#">Terra progress report 2020</a>	
ING	Lending portfolio CO2e intensity	<a href="https://www.ing.com/Newsroom/News/2020-ING-Terra-progress-report-1.htm">https://www.ing.com/Newsroom/News/2020-ING-Terra-progress-report-1.htm</a>	
ING	Climate finance	Our business - Facilitating change	ING's Climate Finance portfolio includes projects that advance renewable energy, circular economy and help combat climate change. The subcategories can be summarized as follows: <ul style="list-style-type: none"> <li>• Energy Transition</li> <li>• Energy Efficiency</li> <li>• Low carbon buildings</li> <li>• Transport</li> <li>• Water</li> <li>• Information Technology and Communications</li> <li>• Circular Economy</li> <li>• Waste management</li> <li>• Others</li> </ul>
ING	Lending to industry ESG leaders	<a href="https://www.ing.com/Sustainability/Sustainable-business/How-we-measure.htm">https://www.ing.com/Sustainability/Sustainable-business/How-we-measure.htm</a>	Industry Environmental, Social and Governance Leaders (IESGL) are clients which ING considers "best-in-class", based on a strong Management Score (50 or higher) by ESG rating provider Sustainalytics. Companies or sectors that are restricted by ING's Environmental and Social Risk policy (for example coal companies) are excluded, as well as companies with high or severe controversies (by Sustainalytics) cannot be considered as an IESGL.
SASB FN-CB-4101a.2.	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	See SASB index table	
<b>Material topic: Customer privacy &amp; information security</b>			
GRI 418	Disclosure on management approach	How we make a difference - Cybercrime resilience and fraud management World around us - Cybersecurity resilience, Personal data protection Risk management - Risk management at ING Group - Cybercrime	
418-1	Substantiated complaints regarding breaches of customer privacy and losses of customer data	How we make a difference - Cybercrime resilience and fraud management	No major cybersecurity incidents occurred during 2020, despite the increasing sophistication and frequency of attacks. To an increasing degree ING had to respond to breaches at third parties or service providers, a trend seen across the financial industry. DDoS attacks are "business as usual" for our cybersecurity teams. DDoS attacks in Turkey and Belgium this year had some impact. So far, ING has not experienced material impact or loss of data due to cybercrime, although the costs to protect our customers against cybercrime are rising.
SASB FN-CF-220a.2	Total amount of monetary losses as a result of legal proceedings	See SASB index table	
<b>Material topic: Cybercrime resilience</b>			
DMA	Disclosure on management approach	Cybercrime resilience - Privacy  World around us - Cybersecurity resilience, Personal data protection Risk management - Risk management at ING Group - Cybercrime	
SASB FN-CF-230a.3	Description of approach to identifying and addressing data security risks	See SASB index table	
ING	Description of preventive measures in place for ING data centres and organisational resilience	How we make a difference - Cybercrime resilience	

ING	Number of cybersecurity incidents	How we make a difference - Cybercrime resilience	
<b>Material topic: Culture, ethics and integrity</b>			
DMA	Disclosure on management approach	World around us - Culture and integrity <a href="https://www.ing.com/About-us/Compliance/Zero-Tolerance-Bribery-Statement.htm">https://www.ing.com/About-us/Compliance/Zero-Tolerance-Bribery-Statement.htm</a> Risk management - Risk culture Risk management - Banker's Oath World around us - Financial Crime Risk How we make a difference - Safe, secure and compliant bank Risk management - Compliance Risk - Financial economic crime Risk management - Compliance Risk - Bribery & Corruption	
205-2	Communication and training about anti-corruption policies and procedures	<b>Overview:</b> <a href="https://www.ing.com/About-us/Compliance/KYC-and-anti-money-laundering-measures.htm">https://www.ing.com/About-us/Compliance/KYC-and-anti-money-laundering-measures.htm</a> (specifically section Knowledge & Behavior) <b>Communication:</b> - World around us - Culture and ethics (global Code of Conduct for all employees) - Risk management: Orange Code and global Code of Conduct - Risk management: Banker's Oath (applies to all employees in NL) - Supervisory board report (ING risk culture incl. AML/KYC as key attention area on the agenda) <b>Training:</b> - World around us - Know your customer (focus on increasing employee knowledge and awareness of KYC, trainings offered through KYC Academy incl. a KYC learning module for all employees) - Risk management- Bribery and Corruption (general statement about training on bribery and corruption recognition) - Risk management - Compliance Risk - Financial crime risk and know your customer - Knowledge & Behaviour (8,000 employees enrolled for new KYC learning module in 2020)	To protect our customers, society and our bank from financial economic crime , we need to know who we do business with. ING has implemented a set of policies, programmes and minimum standards in the areas of Know-Your-Customer (KYC) and Financial Economic Crime (FEC).These include: the Orange Code, our Zero tolerance stance on bribery and corruption and our Financial Economic Crime statement.  Know your customer (KYC) is the first step towards a safe and compliant bank. It ensures we only do business with people and companies we have verified as being trustworthy. This includes carrying out customer due diligence checks, updating customer files, screening customers and transactions, monitoring transactions and reporting suspicious activities. Furthermore, ING's Anti-Bribery and Corruption Policy stipulates that bribery and corruption is not accepted in any form and this also applies to our customers and other business partners.
ING	Description of programmes in place in response to incidents of corruption	Risk management - Compliance Risk - Bribery & Corruption How we make a difference - Safe, secure and compliant bank (esp. KYC enhancement program & Knowledge & Behaviour) Risk management - Risk management at ING group - Financial Crime Risk	
ING	Number of colleagues working on the KYC program	How we make a difference - How we create value	
ING	Number of employees trained in the KYC learning module	How we make a difference - Know your customer	6220 employees have been trained in the KYC learning module in 2020, this reflects 87% of all KYC employees
SASB FN-CB-510a.2.	Description of whistleblower policies and procedures	See SASB index table	
<b>Material topic: Innovation</b>			
DMA	Disclosure on Management Approach	Word from our CEO Our strategy - Strategic priorities Our strategy - Innovating to stay a step ahead Our strategy - How we innovate	
ING	Number of investments made from the Venture Capital Fund	Our strategy - How we innovate (ING innovation Fund)	
ING	Number of Fintech partners	Our strategy - External collaboration (# of partnerships)	

ING	Number of employees that followed the PACE Everyday training programme	Our strategy - How we innovate	
<b>Material topic: System availability</b>			
DMA	Disclosure on Management Approach	Our business - Platform thinking Innovation and Transformation - Reliability and stability Introduction - Non-Financial performance	ING monitors the availability of its internet and mobile banking channel in two segments - Retail and Wholesale. Retail system availability for the Netherlands and Belgium is reported as one figure, where the availability in the two countries is weighted using the number of primary customers. Wholesale system availability is reported separately on a global level as one figure. For Retail, which includes SME clients, the channels in scope are the internet banking channel and the mobile banking application. The Internet channels are country specific - MijnING Particulier for the Netherlands Retail, MijnING Zakelijk for the Netherlands SME, HomeBank for Belgium Retail and BusinessBank for Belgium SME. For Wholesale, the channel is one - Inside Business Payments (IBP), offered to Wholesale Banking customers globally. A Retail channel is measured as available when in a specified time-window (or service-window), the basic functionality is available for the customer, meaning a customer is able to log in, see their accounts balance and perform a payment transaction. The Wholesale channel (IBP) is measured as available when in a specified time-window, the client is able to log in and use all the payment functionalities.
ING	System availability	Introduction - Non-Financial performance Our Business	
<b>Material topic: Digitalisation &amp; interconnectivity</b>			
DMA	Disclosure on Management Approach	CEO statement The world around us - Digital transformation Our business - Our digitalisation journey Our people - Digitalisation and the changing organisation Innovation and transformation Our strategy and how we create value	
ING	Number of customer contact that is digital	Word from our CEO	
ING	% of growth in contactless mobile payment volumes	Word from our CEO	
<b>Material topic: Customer experience</b>			
DMA	Disclosure on Management Approach	Our strategy (Universal digital bank, platform approach)  Our strategy - Strategic priorities  Our strategy - Transformation	
ING	Number of primary customers	Our business - Earning the primary relationship	ING aims to build 'primary relationships' with customers, earning their loyalty to the extent that they consider us as the first bank for their financial business. We define a primary relationship as one where customers hold a current account and at least one other product with us.
ING	Net Promoter Score	Our business - Measuring customer satisfaction	Net Promoter Score (NPS) is an indicator measuring customer loyalty and satisfaction. NPS is based on a direct question: 'How likely is it that you would recommend our company/product/service to a friend or colleague?' Promoters are those who respond with a score of 9 or 10 (out of 10) and are thus considered loyal enthusiasts. Detractors are those who respond with a score of 0 to 6 - unhappy customers. Scores of 7 and 8 are passives, and they will only count towards the total number of respondents, but not directly affect the formula. NPS is calculated by subtracting the percentage of customers who are Detractors from the percentage of customers who are Promoters. NPS is measured for 13 ING retail countries are measured - Australia, Austria, Belgium, Czech Republic, France, Germany, Italy, Luxembourg, The Netherlands, Poland, Romania, Spain and Turkey.
<b>Material topic: Employee development</b>			
DMA	Disclosure on Management Approach	Our people - Learning and staying vital  Our people - Continuous learning and talent development	

ING	Human Capital Return on Investment	ING at a glance	The Human Capital Return on Investment (HC ROI) indicator measures ING's profitability in relation to total employee costs by removing non-employee costs from overall operating costs. This indicator helps identify the influence of HR inputs, such as performance management, training and development, automation and organisational structure, on the organisation's productivity. By subtracting Total Operating Expenses (b) less (-) Total employee-related expenses (salaries + benefits) (c) from Total Revenue (a), the company's profitability prior to human capital costs are calculated. Dividing this figure by Total employee-related expenses (salaries + benefits) (c) then leads to the ratio that examines your company's level of profitability in relation to the total human capital expenses.
ING	Budget for training and development	Non-financial appendix	
ING	Number of trainings completed	Non-financial appendix	
<b>Material topic: Environmental &amp; Social Risk Management</b>			
DMA	<b>Disclosure on Management Approach</b>	See SASB index, Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis  Risk management - Environmental, social and governance risk	
SASB FN-CB-4101a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	See SASB index	
ING	Number of ESR advice reports issued	Non-financial appendix - ESR policy in practice	