

ING Group SASB and GRI Content Index 2018

Standard	Disclosure	Reference Annual Report	Page number	Direct Disclosure or Reason for Omission
GRI 102: General disclosures 2016				
1. Organizational profile				
102-1	Name of the organization	Report front cover Corporate Governance	1 101	
102-2	Activities, brands, products, and services	Our strategy and how we create value Our business - Our markets	19 - 20 / 25 36 - 40	To best of our knowledge, ING did not sell any banned or disputed products in 2018.
102-3	Location of the organization's headquarters	General information	439	
102-4	Number of countries operating	ING at a glance Our business - Our markets	3 36 - 40	
102-5	Nature of ownership and legal form	Corporate Governance	101	
102-6	Markets served	ING at a glance Our business - Our markets	3 36 - 40	
102-7	Scale of the reporting organization	ING at a glance Consolidated annual accounts Non-Financial appendix Our people (number of employees)	3 143 - 149 421 - 424 429 - 430	
102-8	Information on employees and other workers	Our people (number of employees)	429 - 430	
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 include 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.
102-10	Significant changes to the organization and its supply chain	Innovation and transformation - Operational excellence Our business - Market leaders	30 37 - 38	
102-11	Precautionary Principle or approach	Our business - Responsible finance Environmental and Social Risk Management	45 - 48 70 - 73	
102-12	External initiatives	Our business - Responsible finance Our people - Commitment to human rights Non-financial appendix - Stakeholder engagement	45 - 48 57 - 59 433 - 436	
102-13	Memberships of associations	Non-financial appendix - Stakeholder engagement	433 - 436	

ING Group SASB and GRI Content Index 2018

Standard	Disclosure	Reference Annual Report	Page number	Direct Disclosure or Reason for Omission
2. Strategy				
102-14	Statement from senior decision-maker	CEO-statement - Embracing the digital future	8 - 11	
3. Ethics and integrity				
102-16	Values, principles, standards, and norms of behavior	Our people	53 - 56	
4. Governance				
102-18	Governance structure	Corporate Governance - Executive Board Corporate Governance - Information on members of the Executive Board Corporate Governance - Supervisory Board Corporate Governance - Information on members of the Supervisory Board Non-financial appendix - Sustainability governance	97 - 98 110 - 111 97 - 99 116 - 117 419	
5. Stakeholder Engagement				
102-40	List of stakeholder groups	The world around us - Financial conditions slightly tighter Non-financial appendix - Stakeholder engagement	13 433 - 436	
102-41	Collective bargaining agreements	Non-financial appendix - Our people	429	
102-42	Identifying and selecting stakeholders	Non-financial appendix - Stakeholder engagement	433 - 436	
102-43	Approach to stakeholder engagement	The world around us Non-financial appendix - Stakeholder engagement	12 - 17 433 - 436	
102-44	Key topics and concerns raised	Non-financial appendix - Stakeholder engagement	433 - 436	
6. Reporting practice				
102-45	Entities included in the consolidated financial statements	Consolidated annual accounts	143 - 149	
102-46	Defining report content and topic Boundaries	About this report Non-financial appendix - Understanding what matters most	80 - 82 419 - 421	
102-47	List of material topics	The world around us	12	
102-48	Restatements of information	-	-	There have been no restatements
102-49	Changes in reporting	About this report Non-financial appendix - Understanding what matters most Non-Financial Reporting Protocol 2018 (https://www.ing.com/Investor-relations/Financial-Reports/Annual-reports.htm)	80 - 82 419 - 421	
102-50	Reporting period	About this report	80 - 82	

ING Group SASB and GRI Content Index 2018

Standard	Disclosure	Reference Annual Report	Page number	Direct Disclosure or Reason for Omission
102-51	Date of most recent report	About this report	80 - 82	
102-52	Reporting cycle	About this report	80 - 82	
102-53	Contact point for questions regarding the report	About this report	80 - 82	
102-54	Claims of reporting in accordance with the GRI Standards	About this report	80 - 82	
102-55	GRI content index	GRI Content Index	81	
102-56	External assurance	About this report	80 - 82	
		Report of the Supervisory Board - Financial and risk reporting	93 - 94	
		Report of the Supervisory Board - Audit Committee meetings	95	
		Corporate Governance - External auditor	119	
Topic Specific Standards				
GRI 201: Economic				
GRI 201-1: Direct economic value generated and distributed (linked to ING's material topics of Financial Performance)				
DMA	Explanation of the material topic and its Boundary	CEO Statement Our business - Our markets The world around us	8 - 11 36 - 40 12 -17	
	The management approach and its components	Our strategy and how we create value Risk, capital, funding and liquidity management - A consistent approach to capital management Report of the Supervisory Board - Financial and risk reporting	19 - 25 62 93- 94	
	Evaluation of the management approach	Our business - Performance in 2018 Risk, capital, funding and liquidity management - Capital developments at ING Group Consolidated annual accounts	36 61 - 62 143 - 149	
201-1	Direct economic value generated or distributed	Consolidated annual accounts Non-financial appendix - Economic value generated	143 - 149 421 - 422	
GRI 301: Environmental Series				
GRI 302: Energy (linked to the material topic of Climate Change)				
DMA	Explanation of the material topic and its Boundary	Non-Financial Appendix - Sustainability governance Non-Financial Appendix - Environmental programme	419 431 - 432	
	The management approach and its components	Non-Financial Appendix - Sustainability governance Non-Financial Appendix - TCFD recommendations Non-Financial Appendix - Environmental programme	419 427 431 - 432	
	Evaluation of the management approach	Non-Financial Appendix - Sustainability governance Non-Financial Appendix - Environmental programme	419 431 - 432	

ING Group SASB and GRI Content Index 2018

Standard	Disclosure	Reference Annual Report	Page number	Direct Disclosure or Reason for Omission
302-1	Energy consumption within the organization	Non-Financial Appendix - Breakdown of energy consumption Non-Financial Reporting Protocol 2018 (https://www.ing.com/Investor-relations/Financial-Reports/Annual-reports.htm)	431	
302-2	Energy consumption outside of the organization	Non-Financial Appendix - Kilometers and carbon emissions through business travel Non-Financial Reporting Protocol 2018 (https://www.ing.com/Investor-relations/Financial-Reports/Annual-reports.htm)	432	
302-4	Reduction of energy consumption	Non-Financial Appendix - Breakdown of energy consumption Non-Financial Reporting Protocol 2018 (https://www.ing.com/Investor-relations/Financial-Reports/Annual-reports.htm)	431	
GRI 305: Emissions (linked to the material topic of Climate Change)				
305	Explanation of the material topic and its Boundary	CEO statement Our business - Responsible finance Non-Financial Appendix - Understanding what matters most	11 45 - 48 419 - 421	
	The management approach and its components	Our business - Responsible finance Environmental and Social Risk Management Non-Financial Appendix - Sustainability governance Non-Financial Appendix - TCFD recommendations Non-Financial Appendix - Environmental programme	45 - 48 70 - 73 419 427 431 - 432	
	Evaluation of the management approach	Performance highlights Our business - Responsible finance Non-Financial Appendix	4 - 7 428 419 - 436	
305-1	Direct greenhouse gas (GHG) emissions (Scope 1)	Non-Financial Appendix - Carbon emissions extrapolated Non-Financial Reporting Protocol 2018 (https://www.ing.com/Investor-relations/Financial-Reports/Annual-reports.htm)	432	
305-2	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	Non-Financial Appendix - Carbon emissions extrapolated Non-Financial Reporting Protocol 2018 (https://www.ing.com/Investor-relations/Financial-Reports/Annual-reports.htm)	432	
305-3	Other indirect greenhouse gas (GHG) emissions (Scope 3)	Non-Financial Appendix - Carbon emissions extrapolated Non-Financial Reporting Protocol 2018 (https://www.ing.com/Investor-relations/Financial-Reports/Annual-reports.htm)	432	
305-5	Reduction of GHG emissions	Non-Financial Appendix - Environmental programme	431 - 432	

ING Group SASB and GRI Content Index 2018

Standard	Disclosure	Reference Annual Report	Page number	Direct Disclosure or Reason for Omission
----------	------------	-------------------------	-------------	--

Sector disclosures linked to material topic Climate
Product portfolio

FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.	Our business - Responsible finance Non-Financial Appendix - Responsible finance	45 - 48 428	
-----	---	--	----------------	--

Audit

DMA	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	Environmental and Social Risk Management	45 - 48 428	
-----	---	--	----------------	--

Active ownership

DMA	Voting policy(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting (former FS12)	-	-	ING offers investment solutions to clients (assets under management). Clients can choose from various investment portfolios, including a sustainable investing portfolio. We screen the investments for the portfolio on social, environmental and governance factors. We do this also for the investment funds we use in the portfolios. ING is not an asset manager or an asset owner and does not hold voting rights. We do have different engagement trajectories, and ask the managers of the selected investment funds to employ active ownership.
-----	---	---	---	--

FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental or social issues	Environmental and Social Risk Management	70 - 73	
------	---	--	---------	--

SASB Standards - Commercial Banks

SASB 2 (FN-CB-4101a.2.)	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	CEO statement The world around us Our business - Responsible finance Environmental and Social Risk Management Non-financial appendix - Responsible finance	8 - 11 12 - 17 45 - 48 70 - 72 428	This year is the first time we are reporting on the SASB Standards Commercial Banks. As to maintain focus and conciseness, we have chosen to integrate the metric FN-CB-4101a.2 within the GRI table. We will aim to increase our disclosure on this metric in the coming years, specifically in relation to our efforts with regards to developing our Terra approach.
-------------------------	--	--	--	---

ING Group SASB and GRI Content Index 2018

Standard	Disclosure	Reference Annual Report	Page number	Direct Disclosure or Reason for Omission
GRI 418: Customer Privacy (Linked to the material topic Customer Privacy and Cyber Resilience)				
DMA	Explanation of the material topic and its Boundary	Our strategy - ING of tomorrow	19 - 20	
		The world around us	12 - 17	
		Innovation and transformation - Data	29	
		Innovation and transformation - Security	30 - 31	
		Innovation and transformation - Innovation	32 - 34	
	The management approach and its components	The world around us	12 - 17	
		Our markets - Knowing our customers	21	
		Innovation and Transformation - Data	29	
		Innovation and Transformation - Security	30 - 31	
		Innovation and Transformation - Innovation	32 - 34	
		Our strategy - Develop data analytics	43	
		Risk, capital, funding and liquidity management - Managing risks to enable a sustainable business while strengthening culture and resilience	65 - 66	
	Evaluation of the management approach	Innovation and Transformation - Data	29	
		Platform Thinking - Open banking	44	
		Our people - Digitalisation and the changing organisation	56 - 57	
418-1	Substantiated complaints regarding breaches of customer privacy and losses of customer data			During 2018 ING has had some dealings with data protection authorities in various countries regarding ING's processing of personal data. None of the interactions led to proceedings that have had a significant effect on the financial position, profitability or reputation of the Company such that they would warrant disclosure in the Legal Proceedings paragraph of our annual report. ING has an ambition to increase disclosures on customer privacy and cyber resilience and is developing metrics for future reporting.
GRI 419: Socioeconomic compliance (Linked to the material topic Business Ethics and Culture)				
DMA	Explanation of the material topic and its Boundary	The world around us values trust	14 - 15	
		Our people	53 - 54	
	The management approach and its components	Elements of our strategy - Performance culture	23	
		Our people - Performance management	55 - 56	
		Managing risks to enable a sustainable business while strengthening culture and resilience	65 - 66	
		Report of the supervisory board - Permanent education and business visits	92 - 93	
	Evaluation of the management approach	Our people - Performance management	55 - 56	
		Managing risks to enable a sustainable business while strengthening culture and resilience	65 - 66	
ING 1	WPC score	Our people - Performance management	55 - 56	
ING 3	Programs in place in response to incidents of corruption (number and description)	Managing risks to enable a sustainable business while strengthening culture and resilience	65 - 66	

Standard	Disclosure	Reference Annual Report	Page number	Direct Disclosure or Reason for Omission
ING's own indicators				
Material topic Innovation				
DMA	Explanation of the material topic and its Boundary	CEO Statement The world around us - Financial conditions slightly tighter Our strategy and how we create value - Elements of our strategy Innovation and transformation	8 - 11 13 - 17 21 - 24 26 - 34	
	The management approach and its components	CEO Statement - Embracing the digital future The world around us - Financial conditions slightly tighter Our strategy and how we create value - Elements of our strategy Innovation and transformation - Platforms Innovation and transformation - Business transformation Innovation and transformation - Transformation management	8 - 11 13 - 17 21 - 24 26 27 - 28 28 - 29	
	Evaluation of the management approach	Innovation and transformation- Platforms Innovation and transformation - Business transformation Innovation and transformation - Transformation management Innovation and transformation - Innovation	26 27 - 28 28 - 29 32 - 34	
ING 4	Number of investments made from the Venture Capital Fund	Innovation and transformation - Innovation	32 - 34	
ING 5	Number of Fintech partners	Innovation and transformation - Innovation	32 - 34	
ING 6	Number of employees that followed the PACE Everyday training programme	Value creation model	25	
Material topic of IT systems and platforms				
DMA	Explanation of the material topic and its Boundary	The world around us - Financial conditions slightly tighter Our strategy and how we create value - Elements of our strategy	13 - 17 21 - 24	
	The management approach and its components	Innovation and transformation - Platforms Innovation and transformation - Business transformation Innovation and transformation - Transformation management Our business - Platform thinking	26 27 - 28 28 - 29 43 - 44	
	Evaluation of the management approach	Innovation and transformation - Platforms Our business - Platform thinking	26 43 - 44	
ING 7	The weighted availability of our platforms	Innovation and transformation - Transformation management	28 - 29	
ING 8	Funds funding IT systems and platforms	Our business - Platform thinking	43 - 44	

ING Group SASB and GRI Content Index 2018

Standard	Disclosure	Reference Annual Report	Page number	Direct Disclosure or Reason for Omission	
Material topic of Usability and accessibility of our products					
DMA	Explanation of the material topic and its Boundary	The world around us is digital Elements of our strategy - Simplify and streamline / Operational excellence Innovation and transformation Our markets (various examples about instant and seamless service and apps)	16 22 - 23 26 - 34 36 - 40		
		The management approach and its components	Elements of our strategy - Operational excellence; Simplify and streamline Our markets (various examples about instant and seamless service and apps)	22 - 23 36 - 40	
		Evaluation of the management approach	Innovation and transformation - Reliability and stability Our business	29 36 - 48	
ING 9	Number of app users	Our business - Our markets	36 - 40		
ING 10	Customer satisfaction (NPS)	CEO Statement - Embracing the digital future	8 - 11		
		Our business - Our markets	36 - 40		
		Our business - Customer promise	41 - 42		
Material topic Digitalisation & interconnectivity					
DMA	Explanation of the material topic and its Boundary	The world around us - Financial conditions slightly tighter Our strategy and how we create value - Elements of our strategy Our business - Our markets Our business - Client-led approach Our business - Responsible finance	13 - 17 21 - 24 36 - 40 42 45 - 48		
		The management approach and its components	Elements of our strategy - Develop data analytics Innovation and transformation - Business transformation Our business - Our markets Our business - Customer promise Our people - Developing leadership Our people - Digitalisation and the changing organisation	21 27 - 28 36 - 40 41 - 42 56 56 - 57	
		Evaluation of the management approach	CEO Statement - Embracing the digital future Our business - Our markets Our business - Customer promise	8 - 11 36 - 40 41 - 42	
ING 11	Increased digital functionalities for customers	Our business - Platform thinking	43 - 44		