

Global Reporting Initiative (GRI) table

The GRI standards provide requirements for reporting on material topics. In this GRI table, we report our alignment with the GRI standards.

Standard	Disclosure	Chapter and section reference in ING Group Annual Report 2023 (unless stated otherwise)	Direct answer or reason for omission
Statement of use	ING has reported the information cited in this GRI table for the period 1 January to 31 December 2023 in accordance with the GRI Standards.		
GRI 2: General Disclosures 2021			
GRI Standard Title			
1. The organization and its reporting practices			
2-1	Organizational details	About this report - Approach to integrated reporting	
2-2	Entities included in the organization's sustainability reporting	Corporate governance - ING's legal and management structure - Legal structure Notes to the Consolidated financial statements - Reporting entity and authorisation of the Consolidated financial statements Segment reporting - Information Geographical areas (Note 31)	
2-3	Reporting period, frequency and contact point	About this report - Approach to integrated reporting About this report - Who this report is for	

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2-4	Restatements of information	ESG overview – Environment – Financed emission ESG overview – Social – Gender pay gap analysis	We two have restatements of information from previous reporting periods. The restatements relate to our Financed Emissions disclosure and our Gender pay gap analysis.
2-5	External assurance	ING official website – External auditors Other information and appendices – Limited assurance report of the independent auditor on the non-financial information	
2. Activities and workers			
2-6	Activities, value chain, and other business relationships	Introduction – ING at a glance – Our business Introduction – ING at a glance – Our markets Introduction – How we create value – How we create value for our stakeholders Strategy and performance – Superior Customer Experience	
2-7	Employees	ESG overview – Social – Unlocking our people's full potential	
2-8	Workers who are not employees	ESG overview – Social – 'Unlocking our people's full potential' chapter	We disclose information on our employees in the ESG overview. ING does not disclose the total number of workers who are not employees and whose work is controlled by the organization.

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2-8 (cont'd)			This information and related metrics are not used internally and are therefore considered as not applicable.
3. Governance			
2-9	Governance structure and composition	<p>ESG overview – Our ESG governance approach</p> <p>Our leadership and corporate governance – Corporate governance – ING’s legal and management structure</p> <p>Our leadership and corporate governance – Members of the Executive Board and Management Board Banking</p> <p>Our leadership and corporate governance Supervisory Board Report</p>	
2-10	Nomination and selection of the highest governance body	Our leadership and corporate governance - Supervisory Board report	
2-11	Chair of the highest governance body	<p>Our leadership and corporate governance</p> <p>Supervisory Board report</p> <p>Our leadership and corporate governance - Corporate governance – Supervisory Board / Executive Board</p>	
2-12	Role of the highest governance body in overseeing the management of impacts	Introduction – How we create value	

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2-13	Delegation of responsibility for managing impacts	ESG overview – Our ESG governance approach	
2-14	Role of the highest governance body in sustainability reporting	Strategy and performance – The world around us - stakeholder engagement (including materiality assessment) Our leadership and corporate governance - Corporate governance - Supervisory Board and Executive Board	
2-15	Conflicts of interest	Our leadership and corporate governance – Supervisory Board report Our leadership and corporate governance – Corporate governance - Supervisory Board and Executive Board: <ul style="list-style-type: none"> - Relevant positions pursuant to CRD IV / conflicting interests - Transactions involving actual or potential conflicts of interest Risk Management – Conduct compliance and ethics – Conduct compliance and ethics	
2-16	Communication of critical concerns	Risk Management - Environmental, social and governance risk Our leadership and corporate governance - Corporate governance - Supervisory Board and Executive Board	
2-17	Collective knowledge of the highest governance body	Our leadership and corporate governance – Supervisory Board report	

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2-18	Evaluation of the performance of the highest governance body	Our leadership and corporate governance – Supervisory Board report	
2-19	Remuneration policies	ESG overview - ESG-linked executive remuneration	
2-20	Process to determine remuneration	Our leadership and corporate governance – Supervisory Board report	
2-21	Annual total compensation ratio	Our leadership and corporate governance - Remuneration Report	
4. Strategy, policies and practices			
2-22	Statement on sustainable development strategy	Introduction – Message from our CEO and Chairman Our leadership and corporate governance	
2-23	Policy commitments	Strategy and performance – Sustainability at the heart	
2-24	Embedding policy commitments	ESG overview – (Governance - Business ethics and integrity) Risk management: Environmental, social and governance risk We publish our ESR framework, Global Code of Conduct and Human rights report on ing.com: <ul style="list-style-type: none"> - Environmental and social risk (ESR) ING - ING Global Code of Conduct - Statement on Human rights 	

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2-25	Processes to remediate negative impacts	<p>Strategy and performance – The world around us and Our strategy</p> <p>ESG overview</p> <p>Risk Management – Environmental, social and governance risk</p> <p>Risk management - Compliance risk</p> <p>We refer to our GRI 3 assessment in this document for more details and references</p>	
2-26	Mechanisms for seeking advice and raising concerns	<p>Strategy and performance – How we are making the difference – Staying safe and secure</p> <p>ESG overview – Governance – Business ethics and integrity</p> <p>Risk management - Compliance risk</p> <p>Risk management – Compliance risk - Conduct compliance and ethics</p>	
2-27	Compliance with laws and regulations	<p>Our leadership and corporate governance – Executive Board statement</p> <p>Risk Management - Environmental, social and governance and Compliance risk</p> <p>Consolidated financial statements, note 42 Legal proceedings</p>	

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2-28	Membership associations	<p>Strategy and performance – The world around us – Stakeholder engagement</p> <p>ESG overview – Collaboration and stakeholder engagement</p> <p>ESG overview – Environment</p> <p>ESG overview – Social – Human rights</p>	
5. Stakeholder engagement			
2-29	Approach to stakeholder engagement	<p>Strategy and performance – The world around us</p> <p>ESG overview</p> <p>Our leadership and corporate governance – Supervisory Board report</p> <p>For a more comprehensive overview of our stakeholder engagement, please visit ing.com: Stakeholder engagement and dialogue</p>	
2-30	Collective bargaining agreements		<p>In 2023, substantially all of the Group’s Dutch employees have been subject to a collective labour agreement covering ING in the Netherlands. Our ambition is to report on this topic in accordance with the CSRD in the coming reporting period.</p>

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GRI 3: Material topics 2023			
3-1	Process to determine material topics	Strategy and performance – The world around us	
3-2	List of material topics	Strategy and performance – Materiality matrix Strategy and performance – The world around us	
Material topic: Financial stability			
Definition: Financial stability can be defined as a condition in which the financial system – which comprises financial intermediaries, markets and market infrastructures – is capable of withstanding shocks and the unravelling of financial imbalances. This mitigates the prospect of disruptions in the financial intermediation process that are severe enough to adversely impact real economic activity.			
3-3	Management of material topics	Strategy and performance – The world around us - Stakeholder engagement Risk management – Solvency risk - ICAAP framework Risk management – Environmental, social and governance risk Risk management – Compliance risk - Conduct compliance and ethics Other information and appendices - Stakeholder engagement table	
201-1	Direct economic value generated and distributed	Consolidated financial statements Note 31 Information on geographical areas	

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Material topic: Climate change			
Definition: Climate change is the significant variation of average weather conditions becoming, for example, warmer, wetter, or drier - over several decades or longer.			
3-3	Management of material topics	ESG overview – Environment ESG overview – Social - Customers - Human rights Risk management – Environmental, social and governance risk Other information and appendices - Stakeholder engagement table	
201-2	Financial implications and other risks and opportunities due to climate change	Risk management – Environmental, social and governance risk ESG overview – Environment - Managing climate risks	
Material topic: Customer welfare			
Definition: The category addresses customer welfare concerns over issues including, but not limited to, financial health and financial services provided. The category addresses the company’s ability to provide customers with financial services and financial products that are aligned with societal expectations. Furthermore, the category addresses qualities inherent to the design and delivery of financial products and services where customer welfare may be in question.			
3-3	Management of material topics	Strategy and performance – The world around us - Stakeholder engagement Strategy and performance – Superior customer experience ESG overview – Social - Customers	

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3-3 (cont'd)		Risk management – Non-financial risk - Cybercrime and fraud Other information and appendices -Stakeholder engagement table	
Material topic: Anticorruption, fraud and financial crime			
<p>Definition: Corruption is defined as abuse of entrusted power for private gain, which can be instigated by individuals or organisations. It includes practices such as facilitation payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the undertaking's business. This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage.</p>			
3-3	Management of material topics	Strategy and performance – How we are making the difference - Staying safe and secure ESG overview – Governance Risk management – Compliance risk Other information and appendices - Stakeholder engagement table	
205-1	Operations assessed for risks related to corruption	ESG overview – Governance - Financial economic crime Risk management – Compliance risk - Financial crime risk	

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Material topic: Data privacy and security			
<p>Definition: The category addresses management of risks related to collection, retention, and use of sensitive, confidential, and/or proprietary customer or user data. It includes social issues that may arise from incidents such as data breaches in which personally identifiable information (PII) and other user or customer data may be exposed. It addresses a company's strategy, policies, and practices related to IT infrastructure, staff training, record keeping, cooperation with law enforcement, and other mechanisms used to ensure security of customer or user data.</p>			
3-3	Management of material topics	<p>Strategy and performance – The world around us - Stakeholder engagement</p> <p>Strategy and performance – How we are making the difference - Staying safe and secure</p> <p>Risk management - Risk culture</p> <p>Risk management - Non-financial risk</p> <p>Risk management - Compliance risk - Data protection – (Education)</p> <p>ESG overview – Governance</p> <p>Other information and appendices - Stakeholder engagement table</p>	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	<p>Strategy and performance – How we are making the difference</p> <p>Staying safe and secure - Data privacy, protection and ethics</p> <p>Risk Management – Compliance risk - Data protection</p> <p>Other information and appendices – Risk factors</p>	We disclose our approach to data privacy and the applicable regulatory frameworks. We do not disclose any quantitative information regarding data privacy due to confidentiality constraints.

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Material topic: Society welfare			
Definition: Engaging with our local communities through partnerships and sponsorships, for example to support with financial health improvement.			
3-3	Management of material topics	ESG Overview – Social - Customers Risk management - Compliance risk – Data protection Other information and appendices - Stakeholder engagement table	
Material topic: Working conditions			
Definition: Working conditions include: i. secure employment; ii. working time; iii. adequate wages; iv. social dialogue; v. freedom of association, the existence of works councils and the information, consultation and participation rights of workers; vi. collective bargaining, including the rate of workers covered by collective agreements; vii. work-life balance; and viii. health and safety.			
3-3	Management of material topics	ESG Overview - Our ESG governance approach ESG Overview – Social Strategy and performance – How we are making the difference - Staying safe and secure - Data privacy, protection and ethics Strategy and performance – How we are making the difference - Unlocking our people’s full potential Other information and appendices - Stakeholder engagement table	

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401-1	New employee hires and employee turnover	ESG overview – Social – ING's workforce – the numbers	In our ESG overview – ING's workforce – we disclose the total headcount and the headcount per gender for the top three countries and per region. Furthermore, we disclose amongst others the types of employees (permanent, temporary etc.) the employee turnover, the age and gender distribution. The total number and rate of "new employee hires" and "employee turnover" by age group, gender and region has not been disclosed due to confidentiality constraints.
405-1	Diversity of governance bodies and employees	Our leadership and corporate governance ESG overview – Social - Unlocking our people's full potential	We disclose a breakdown of the ratio of basic salary and remuneration of women to men and the diversity of employees per significant location (>250 employees headcount) and regional distribution, respectively.
405-2	Ratio of basic salary and remuneration of women to men	ESG overview – Social - Unlocking our people's full potential	The breakdown by employees category (level and function) is not disclosed due to confidentiality constraints.

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406-1	Incidents of discrimination and corrective actions taken	ESG overview – Social - Unlocking our people's full potential	Our current disclosure includes our stance on discrimination and actions taken within the organisation to monitor and prevent it. The total number of incidents related to discrimination, during the reporting period, has not been disclosed due to data privacy constraints.