

Responsible Banking Progress Statement – ING 2024

This Progress Statement has been prepared following the guidance provided by the [Principles for Responsible Banking \(PRB\)](#)

Principle 1: Alignment

ING's strategy is built around our purpose of empowering people to stay a step ahead in life and in business. We aim to fulfil our purpose with our two strategic pillars: providing superior value to our customers and putting sustainability at the heart of what we do. (1)

We have a role in society to define new ways of doing business that align with economic growth and social impact. Climate change is one of the world's biggest challenges, threatening life on our planet, including its people, many of whom also struggle with inequality, poor financial health and a lack of basic human rights. ING wants to build a sustainable future for our company, our customers, society and the environment. We aim to lead by example by striving for net zero in our own operations. And we play our part in the low-carbon transformation that's necessary to achieve a sustainable future, aiming to steer financing towards meeting global climate goals and working with clients to achieve their own sustainability goals. (2)

References and other relevant links:

- (1) [ING.com: Strategy](#)
- (2) [ING Group Annual Report 2024](#), Our strategy, p. 14
- [ING.com: ING at a glance](#)
- [ING.com: Sustainable development goals](#)
- [ING.com: Sustainability approach](#)

Principle 2: Impact & Target Setting

[ING's 2023 PRB impact analysis](#) identified (i) climate change mitigation and (ii) financial health & inclusion as priority areas for target setting under PRB. In 2024, ING Group conducted a Double Materiality Assessment (DMA) for Corporate Sustainability Reporting Directive (CSRD) reporting based on the European Sustainability Reporting Standards (ESRS). This DMA identified biodiversity & ecosystems (impact on state of species) as material, and not financial health & inclusion. (1) Therefore, this year, (i) climate change mitigation and (ii) nature (biodiversity and ecosystems) are priority areas for target setting under PRB, due to the 2024 assessment. ING continues to work on financial health & inclusion and human rights; more information on these topics can be found on [ING.com](#).

In pursuit of our climate change mitigation actions we have disclosed the current scope and status of ING's transition plan per [ESRS E1](#) in the 2024 ING Group Sustainability Statement. We have also disclosed the policies and actions taken to manage our impacts, risks and opportunities, including the development and implementation of our ESG Risk Policy. (2)

The overarching ambition of our nature strategy is to empower our clients to contribute to halting and reversing nature loss and support the goals of the Kunming-Montreal Global Biodiversity Framework. We are currently developing a transition plan relevant also to [ESRS E4](#) that should become operational in the coming years. We also use recommendations of the PRB Nature Target-Setting Guidance to inform our actions. (3)

Principle 3: Clients & Customers

ING has started embedding client alignment into our decision-making within the Wholesale Banking portfolio. We've created a data-driven ESG risk assessment of our clients and transactions. (1) A new approach was developed, which considers the (climate and) environmental, social and governance risk factors, negative impacts and dependencies of our Wholesale Banking customers, and fully integrates the previous ESR framework. Tooling was developed to support the implementation of the assessment approach in the credit granting process. (2)

To support our client engagement we have developed an online tool called ESG.X to collect clients' publicly disclosed data on their climate transition plans, resulting in a Client Transition Plan (CTP) score per client. We began with Wholesale Banking clients in scope of our Terra approach and our largest clients, collecting plans of around 2,000 clients. In 2024, we started to use the CTP assessments to inform our discussions with these clients to better understand their plans and enrich our data with qualitative information. These data-driven client engagement discussions are supported by a new Sustainability Client Engagement toolkit and training for client-facing teams in Wholesale Banking to establish consistency when tracking progress and providing support for clients in their transitions. (1)

- [ING.com: Our climate approach](#)
- [ING.com: Nature](#)
- [ING.com: Human rights](#)
- [ING.com: ESR \(including ESR framework\)](#)
- [ING Group Annual Report 2024](#), ING at a glance, pp. 8-12; Our strategy; How we create value and How we create value for our stakeholders; pp. 14-16; Sustainability at the heart, pp. 20-21; and the Environmental, Social and Governance (ESG) Risk Framework, pp. 211 ff.
- ING [Climate Progress Update 2024](#), Our strategic ambition and climate action approach, pp. 12-14.

References and other relevant links:

- (1) [ING Group Annual Report 2024](#), Double Materiality Assessment, pp. 97-102.
- (2) ING Group Annual Report 2024, 2024 ING Group Sustainability Statement, pp. 105-129 and [Climate Progress Update 2024](#), pp. 31-74 and 96-105 for climate performance measurement, alignment, baseline, SMART targets, progress monitoring and actions.
- (2) ING Group Annual Report 2024, 2024 ING Group Sustainability Statement, Climate change impacts, risks and opportunities (IROs), pp. 105-107; Policies and guidelines in place to manage our IROs, pp. 127-129.
- (2) ING Group Annual Report 2024, Scenario selection, target-setting, scoping and metrics measurement, p. 109-111; Other disclosures related to our transition plan, p. 107-108.
- (3) ING Group Annual Report 2024, 2024 ING Group Sustainability Statement, p. 130 for biodiversity and ecosystems (state of species) IROs.
- (3) ING Group Annual Report 2024, 2024 ING Group Sustainability Statement, pp. 130-132 for strategy, policies and planned actions (see also [Nature Publication 2024](#)).

Via our volumes mobilised, we are committed to supporting our Wholesale Banking clients in their sustainable transition through our offering of products such as green, social and sustainability loans and bonds. In 2024, we saw €130 billion of volumes mobilised and updated our ambition with the new target to mobilise €150 billion of annual financing by 2027, up from our previous target of €125 billion annually by 2025. (3)

ING aims to integrate nature in the Client Transition Plan in 2025, and in our sustainability approach more generally, and started to identify and collect data that will help us to address nature and climate performance in a holistic manner. (4)

In 2024 ING also enhanced our deforestation risk management, by engaging with clients in key sectors (also taking into account the new EU Deforestation Regulation). This work should be further developed in 2025 to form part of ING's ESG Risk Framework. The current ESG Risk Framework is detailed in the ING Group Annual Report 2024. (5), (6)

References and other relevant links:

- (1) [ING Group Annual Report 2024](#), 2024 ING Group Sustainability Statement, Embedding client alignment into our decision-making, p. 108
- (1) [Climate Progress Update 2024](#), Helping our clients to accelerate their plans for transition, pp. 18-26.
- (2) ING Group Annual Report 2024, 2024 ING Group Sustainability Statement, ESG Risk assessment tool, p. 128
- (3) ING Group Annual Report 2024, Actions to support our clients' transition, p. 129.

Principle 4: Stakeholders

ING recognises the importance of regular and meaningful engagement and dialogue with its many and diverse stakeholders. We consider our stakeholders to be groups and individuals who, directly or indirectly, influence – or are, or may be, influenced by – the attainment of ING's business or operations. Rather than having one-off consultations around specific topics, we have an ongoing dialogue about our role in society, our products and services, our business performance and other matters. (1)

More information on our stakeholder engagement can be found on ING.com and in our publications.

References and other relevant links:

- (1) [ING Group Annual Report 2024](#), How we create value, p. 15
- (2) [ING Group Annual Report 2024](#), ING Group 2024 Sustainability Statement, Validation of the outcome through stakeholders' engagement, p. 100

Principle 5: Governance & Culture

At ING, we have integrated sustainability into our existing governance. See page 103 of the 2024 ING Group Annual Report for more details.

In 2022, ING established an ad hoc ESG committee assisting the Supervisory Board with regards to matters relating to ESG, including, but not limited to, the development and integration of ESG across the bank and its strategy, and the ratification, discussion and adoption of new and updated key policies, amongst others, related to business conduct. During 2024, given the dynamic and continuously evolving nature of ESG, the ESG committee was established as a permanent committee. It meets quarterly.

ESG is a regular subject on the agenda of ING's management boards (the Executive Board (EB) and the Management Board Banking (MBB)) in their capacity of day-to-day management of the business and as part of their responsibility for ING's long-term (ESG) strategy. ESG-related matters, the related impacts, risks and opportunities and their effect on our

- (3) [ING.com: Sustainability performance and reporting \(for commitment on financing that contributes to the sustainable transition of our clients\)](#).
- (3) [Climate Progress Update 2024](#), Sustainable and transition finance, pp. 76-78.
- (4) ING Group Annual Report 2024, 2024 ING Group Sustainability Statement, Biodiversity and ecosystems, Our planned actions and targets p. 132
- (5) [Deforestation Stance 2024](#)
- (6) [ING Group Annual Report 2024](#), ESG Risk Framework, pp. 211 ff.

Principle 6: Transparency & Accountability

The 2024 ING Group Sustainability Statement in the 2024 ING Group Annual Report is produced in accordance with the European Sustainability Reporting Standards (ESRS), which we voluntarily apply as the Corporate Sustainability Reporting Directive (CSRD) has not yet been transposed into Dutch law.

Limited third-party assurance has been undertaken, voluntarily, on the information in the 2024 ING Group Annual Report as specified in the Limited assurance report on the Sustainability Statement at pages 350-352. (1)

The Climate Progress Update 2024 Index provides reference between the contents of that publication and the Transition Plan Task Force Banks Sector Guidance, GFANZ Financial Institutions Net-zero Transition Plans Recommendations and Guidance, and the NZBA Guidelines 2024. (2)

ING's Nature Publication 2024 refers to the Taskforce on

- (3) [ING.com: Sustainability – Partnerships and collective action - How we engage](#)
- (4) [ING.com: Sustainability – Partnerships and collective action – Stakeholder engagement and dialogue](#)
- (5) [Climate Progress Update 2024](#), How we partner and advocate for change, pp. 27-29.
- (6) [Summary for policymakers - Accelerating the transition to a low-carbon economy: Sector priorities for driving change, drawn from ING's Climate Progress Updates 2024](#)

strategy are intertwined in many other discussions and topics discussed by the EB and MBB. These meetings generally take place on a weekly basis.

There are also ESG governance bodies and channels at senior management level and throughout the business. (1)

The Climate Progress Update 2024 also contains information on the governance of our climate alignment strategy, Terra.

(2) A Nature-Alignment Group was created in 2024, bringing together senior ING leaders, aimed at connecting and mobilising activities across key departments of the bank.

We are working to instil an effective sustainability culture throughout ING. As at end-August 2024, more than 75% of employees had completed our e-learning 'Putting sustainability at the heart' and 4,000 ING colleagues had completed a Climate Fresk workshop. (3) Two e-learning modules were created in 2024 on nature and biodiversity.

References and other relevant links:

- (1) [ING Group Annual Report 2024](#), ING Group 2024 Sustainability Statement, Our sustainability governance, p. 103; and Our leadership and corporate governance (for details about the full function of governance bodies and the composition of ING's Management and Supervisory Board, including their roles, expertise and remuneration), pp. 36 ff.
- (1) [ING.com – Sustainability Governance](#)
- (2) [Climate Progress Update 2024](#), Governance, p. 86
- (3) [Climate Progress Update 2024](#), Upskilling and empowering our organisation for an effective sustainability culture, pp. 88-89

Nature-related Financial Disclosures (TNFD). (3) Further, by disclosing the 2024 ING Group Sustainability Statement in line with the CSRD, ING has also disclosed according to the TNFD.

ING published a Deforestation Stance in 2024 to prioritise engagement and financing activities to halt deforestation in material sectors linked with deforestation risks. (4)

ING's Human Rights Report 2022-2023 addresses the UN Guiding Principles on Business and Human Rights. (5)

References and other relevant links:

- (1) See Assurance Statement at p. 350-352 of the [ING Group Annual Report 2024](#).
- (2) [Climate Progress Update 2024](#), Index, p. 94-95
- (3) [Nature Publication 2024](#), TNFD alignment table, p. 17
- (4) [Deforestation Stance 2024](#)
- (5) [Human Rights Report 2022/2023](#), Appendix, pp. 68-70