

# Human Rights and the Workplace

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# 1 Human Rights and the Workplace

Human rights are universal. This means that every person around the world deserves to be treated with dignity and have their interests considered equally. The United Nations Guiding Principles on Business and Human Rights (UNGPs) set global standards for i) guiding responsible business conduct and ii) preventing and addressing the risk of adverse impacts on human rights in business operations. It is based on three pillars:

- Pillar 1: the expectations for states to protect human rights in the context of business operations
- Pillar 2: the responsibility for corporates to respect human rights, and
- Pillar 3: access to remedy, that sets out the criteria for effectiveness of judicial and non-judicial grievance mechanisms implemented by both States and businesses.

At ING, we endorse the UNGPs and believe in respecting human rights in the different roles that we have as a bank. In our role as an employer, we impact the lives of over 60,000 workers worldwide. We value our people and seek to be a socially responsible employer.

ING follows various standards for human rights when it comes to our workforce. The most widely accepted standard on human rights is the United Nations' Universal Declaration of Human Rights (UDHR), adopted in 1948 by the General Assembly of the United Nations. It describes civil, political, economic, social and cultural rights.

The International Labour Organisation (ILO), a UN agency bringing together governments, employers and workers representatives from 187 member states is also important in this context. The ILO sets labour standards (including the ILO Core Conventions<sup>1</sup>), develops policies and creates programmes promoting decent work for all people.

We're also guided by the UN Global Compact as a signatory since 2006. The UN Global Compact is a UN initiative to encourage businesses worldwide to adopt sustainable practices, including on human rights.

We adhere to local labour laws and regulations in all countries we have operations in. In countries where local legislation goes further than the principles set out by the UDHR, ILO Core Conventions and/or UN Global Compact, we will also apply additional and stricter requirements of local legislation. In countries where local legislation prevents us from upholding aspects of the UDHR, ILO Core Conventions, provisions of the UN Global Compact or ING's own human resources policies, we strive to act in the spirit and nature of these principles while respecting and adhering to applicable local legislation (to the extent that the deviation from the international standards or policy in question is acceptable to us).

In line with the UNGP Reporting Framework, we conducted a salient human rights issue analysis for our role as an employer, where we identified discrimination, harassment, work-related stress as salient human rights issues for our workforce in 2023. A full description of this assessment and the management and mitigation of these issues was published in ING's [2022/2023 human rights report](#).

ING has global and local policies as well as initiatives that address human rights issues that may affect our workforce. Hereby, we aim to foster a healthy working environment where

<sup>1</sup> <https://www.ilo.org/international-labour-standards/conventions-protocols-and-recommendations>

everyone feels safe, feel they belong and is respected for who they are.

We uphold the freedom of association for our workforce and recognise the right to collective bargaining. We aim to ensure safe and healthy working conditions, including adequate working time and leave, appropriate payment of wages, effective oversight of occupational health and safety (OHS), mental, physical and social well-being. We involve our people, subject to local legislation and culture, when dealing with matters affecting the workforce, ensuring their point of view is heard and considered. Works Councils, where established, ensure that employees are well informed and consulted on significant company decisions.

We promote non-discrimination and equal remuneration for all people regardless of age, sex, gender identity or expression, gender reassignment, sexual orientation, family responsibility (including pregnancy, maternity, paternity and adoption), partnership status, cultural background, religion, race, ethnicity, disability or neurodiversity, nationality, political opinion, social origin or any other status, that has the effect of nullifying or impairing equal opportunity or treatment in employment. The global Diversity Inclusion & Belonging (DIB) strategy is designed to help us strive towards a truly inclusive culture and environment for our people and customers through both words and actions.

The ING Orange Code and the Code of Conduct set out general values and behaviours articulating a set of standards that we collectively value, strive to live up to and invite others to measure us by. The Global Code of Conduct contains principles that give guidance on appropriate and inappropriate conduct within ING's day-to-day business, linking the Orange Code with our main policies, minimum standards and guidelines. Through the Global Whistleblower Policy, we actively encourage our people, candidates, and other parties to raise concerns when they are confronted with unethical or illegal behaviour that is directly related to ING staff.

People are our greatest asset and their wellbeing matters. If our people feel energised and are able to manage their workload, they can perform at their best and make a difference for our customers, society, and the planet. But managing and improving their wellbeing can also be a challenge.

Our local entities have a range of services in place that support the wellbeing of our people. In addition, ING has launched a global initiative called 'Our Working Habits', which are a set of behaviours based on employee insights that encourage our employees to work in a way that supports their well-being at work and addresses work-related stress. For instance, we give people insights into their working habits as well as practical tools to help them adopt new habits; this is done through a customised learning journey for managers (as they are proven to be the key ambassadors for this change), tech tools and trainings, self-directed learning channels, agreements within teams, communication campaigns and challenges.

This Human Rights Statement for Workplace was first published in 2006, expressing our commitment to support international labour rights standards and to maintain a healthy and safe working environment for our people.

Through the policies and initiatives mentioned above, we are committed to preventing and addressing harassment, aggression, bullying, discrimination, and other undesirable behaviours, fostering a culture of respect and dignity, and ensuring a safe and supportive workplace for all.

## 2 Decent Work Conditions

Decent work conditions ensure the secure and adaptable employment, wages, social dialogue, collective bargaining and involvement of workers, work-life balance, and a healthy, safe and well adapted work environment.

ING strives to provide decent working conditions by not only adhering to International Labour Standards but also by prioritising the overall wellbeing of our people.

ING promotes the personal and professional growth of our people by providing comprehensive benefits and development opportunities.

### **Freedom of Association and Collective Bargaining**

As defined by ILO, freedom of association is the right of workers and employers to freely form or join organisations that promote and defend their interests at work, without interference from one another or the state. Collective bargaining is a voluntary process through which employers (or their organisations), and trade unions (or in their absence, workers' representatives) discuss and negotiate their relations and interaction at the workplace, such as pay and other terms and conditions of work.

ING upholds freedom of association and the effective recognition of the right to collective bargaining, as outlined in Article 20 of UDHR, UN Global Compact, Principle III and ILO Conventions No. 87 and 98. People, without distinction whatsoever, have the right to establish and, subject only to the rules of the organisation concerned, to join organisations of their own choosing without previous authorisation.

People organisations have the right to

- Draw up their constitutions and rules
- Elect their representatives in full freedom
- Organise their administration and activities Formulate their programmes.

We recognise the right to voluntary negotiations between ING or employers' organisations and people organisations, with an aim to regulate terms and conditions of employment by means of collective agreements.

The works council embodies the spirit of collaboration and democracy in the workplace. Whenever a change is intended in ING, the works council engages in early-stage conversations with the directors, bringing a strong people perspective to the decision-making process and focusing on the potential impact on our people. Members of the works council come from various groups representing ING's diverse makeup, ensuring that we capture the broad perspectives and opinions of all our people. This cooperative approach ensures that people's voices are heard, leading to the best decisions for all partners: people, the organisation, society, and our clients. When people feel seen, heard, valued, and connected, they can make the difference.

### 3 Equal Opportunities

Discrimination includes any distinction, exclusion or preference made on the basis of age, sex, gender identity or expression, gender reassignment, sexual orientation, family responsibility (including pregnancy, maternity, paternity and adoption), partnership status, cultural background, religion, race, ethnicity, disability or neurodiversity, nationality, political opinion, social origin or any other status, that has the effect of nullifying or impairing equal opportunity or treatment in employment. Any distinction, exclusion or preference not based on the inherent requirements of the job is deemed as discrimination.

At ING, we denounce all forms of discrimination, in line with Article 1 and 2 of UDHR, UN Global Compact Principle VI and ILO Core Conventions No. 100 and 111. We expect all employees to behave in accordance with the values and behaviours of our Orange Code and with the principles in our Global Code of Conduct, which applies to all ING business units in all countries.

At ING, we are taking steps together to create a diverse and inclusive culture and environment where everyone belongs. We know that when people feel valued for who they are and able to share their unique perspectives and experiences, they can unlock their full potential. It's this that enables ING to grow the difference for our employees, clients and wider society. Our evidence-based global Diversity, Inclusion & Belonging (DIB) strategy helps us to achieve this vision through both words and actions.

## 4 Combating Undesirable Behaviours

Undesirable behaviours, as defined in ING's Global Whistleblower Policy, include aggression and violence, bullying, discrimination, harassment, retaliation and sexual harassment. These behaviours have negative impacts on the decent working conditions and equal opportunities at ING. By actively identifying and addressing such behaviours, we strive to maintain a positive work environment where all people feel valued and supported.

Everyone at ING is expected to act with integrity and uphold the values and behaviours of our Orange Code. Everyone at ING is expected to know, commit and live up to the Global Code of Conduct. We won't ignore, tolerate, or excuse behaviour that breaches our values or people's trust in ING.

The Global Whistleblower Policy is intended to encourage our people, either internal or external, former employees, candidates, and parties ING has a business relationship with (such as contractors, subcontractors and suppliers) to report suspected or actual criminal acts, unethical behaviour or other misconduct by or within ING.

There are a variety of reporting channels available; these include whistleblowing reporting officers, human resource partners and managers. Locally, countries may have additional reporting channels, such as employment relations consultants, confidential advisors, trusted persons and confidential hotlines. People can also express their concerns via trade unions and workers' communities.

We support our people to raise whistleblower concerns by providing them with an anonymous reporting option; treating all identifying information with utmost confidentiality; disclosing reporters' rights; and having strict anti-retaliation measures in place. Every effort is made to follow up on reports, with an emphasis on protecting a whistleblower's identity.

We are aligning channels across the organisation, like our Speak Up channels for reporting undesirable behaviour, which we've brought together in our Global Speak Up programme. Collecting insights across certain channels has allowed us to better manage anonymous concerns and track if those that are found to be substantiated were followed up.

For more information about human rights at ING, please have a look at [our website](#).