

ING Group Treasury

August 2022



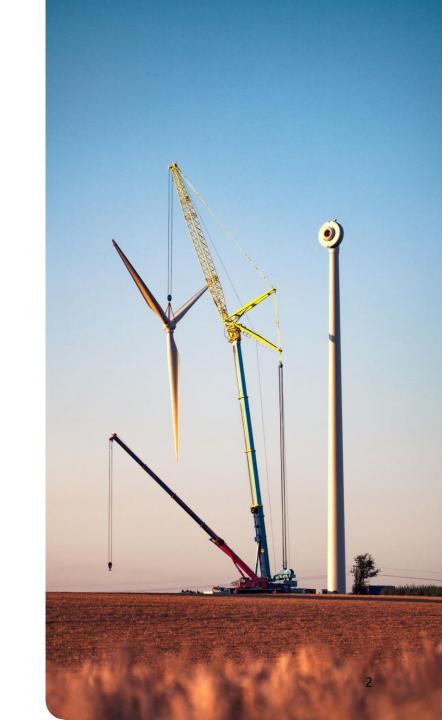
Content

1. ING's Sustainability Strategy

ING's sustainability performance	3-6
Integrated climate approach	7
Terra Approach	8-9
Advising and financing our clients	10
ING's sustainability track record	11

2. ING Group Green Bond Framework

ING Green Bond Issuance	13
ING Green Bond Framework	14
Use of Proceeds	15
Project evaluation and management of proceeds	16
Allocation and impact report	17-18
Second Party Opinion	19
ING Green Eligible Assets	20





Sustainability has been on ING's agenda for decades





Climate change is a risk to be managed and an opportunity to create value



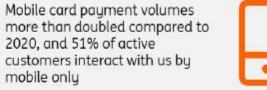
ING has joined the Net-Zero Banking Alliance in support of achieving a world with net-zero greenhouse gas emissions by 2050.

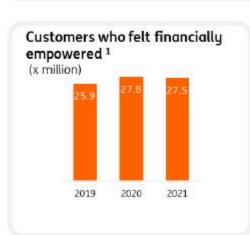


Non-financial performance highlights 2021

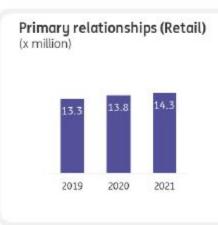


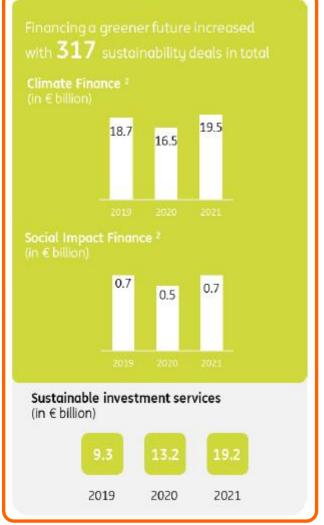
Customers appreciate our differentiating experience, rating us #1 in 5 of our 11 retail markets.











- 1. Subject to reasonable assurance by KPMG. See 'Assurance report of the independent auditor' in the Annual Report 2021.
- 2. For a description of ING's Climate Finance and Social Impact Finance, see www.ing.com/Sustainability/Sustainable-business/How-we-measure.htm
- 3. *Management board refers to ING Groep N.V. board (EB).

Putting sustainability at the heart of what we do

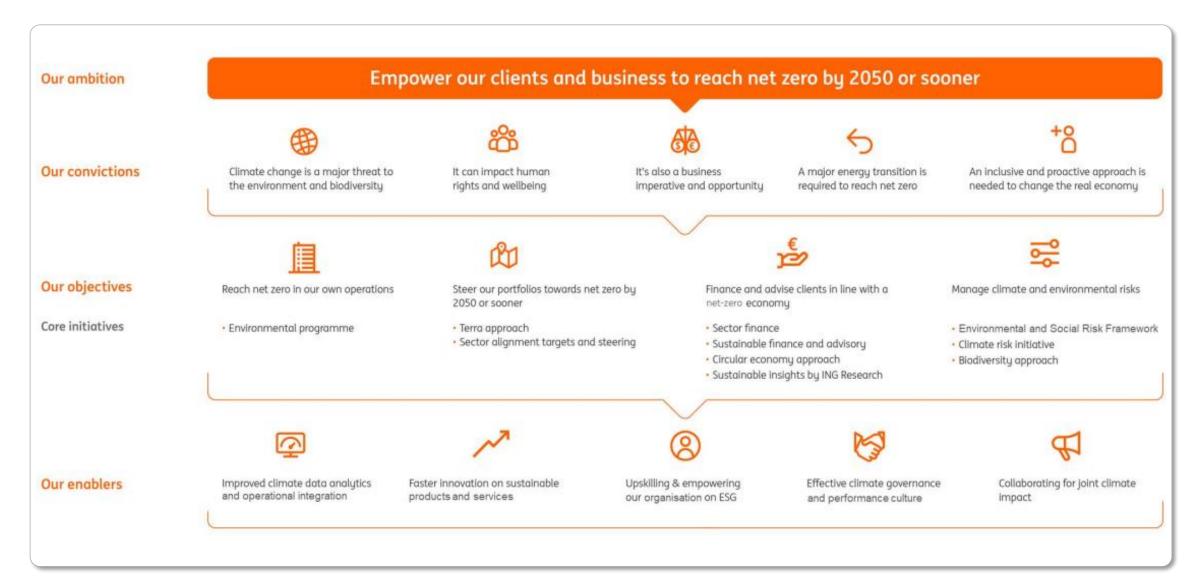
We put our financing to work as we strive to build a sustainable future for our company, our customers, society and the environment.





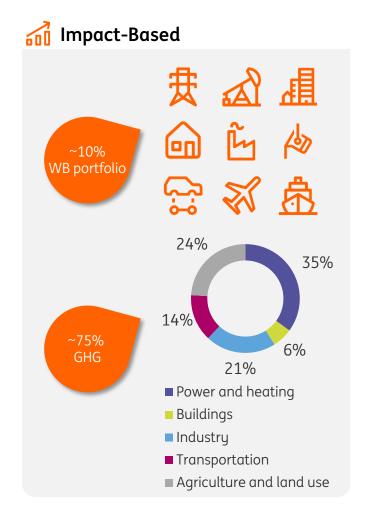
Aligning economic growth with positive environmental and social impact

Our integrated climate approach



Terra's key principles

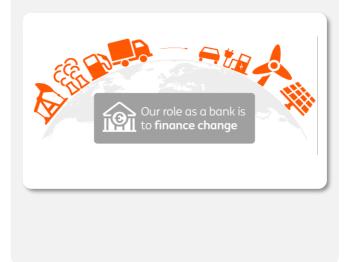
• Steer our loan book towards net-zero by 2050 or sooner and contribute to keeping global warming within 1.5 degrees compared to preindustrial levels.



Science-Based Toolbox approach Apply the best-fit methodology per sector Specific targets per sector Application of science-based scenarios Use of Physical Asset-level-data Transition Assessment SCIENCE **POSEIDON** BASED **PRINCIPLES TARGETS**

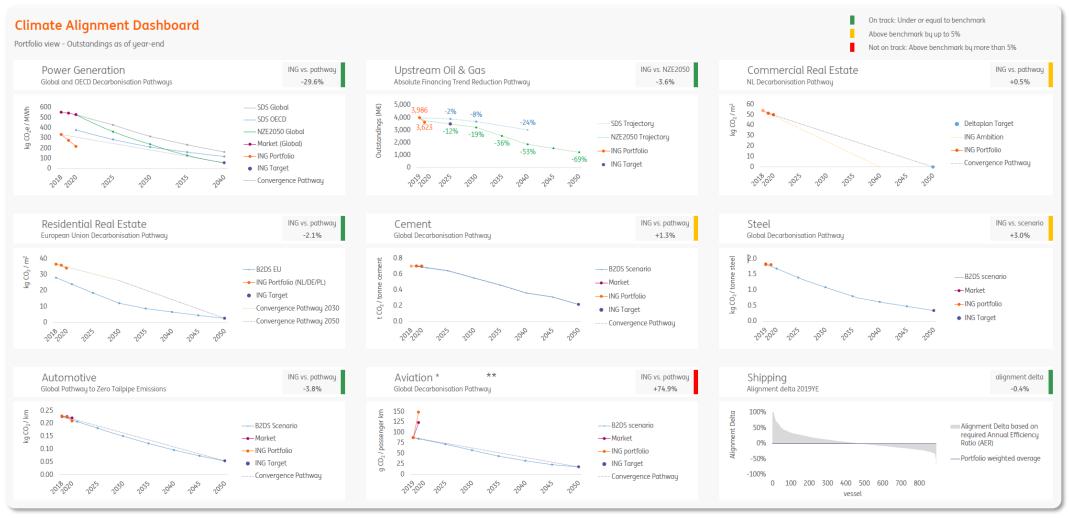
🤝 Engagement-Driven

- Engagement with current clients to help them transition to greener way of doing business
- Selecting prospect clients also based on their stance on sustainability



Terra: Climate Alignment Dashboard

further information.



^{*} Progress measured for 2020 as published in our <u>2021 ING Climate Report</u>. Terra focuses on the most climate-relevant sectors, measured by global carbon footprint (sectors globally responsible for approximately a combined 75% of total emissions). Within each sector, we look at the part of the value chain that generates most of the climate impact.

** Despite a significant reduction in absolute emissions, the aviation sector experienced a severe fluctuation in CO2 intensity due to COVID. Please refer to the sector deep-dive for

Advising and financing our clients

 ING continues to fund companies and sectors that are helping the transition to a low-carbon economy. This includes funding projects that advance renewable energy, the circular economy and help combat climate change. We support these clients though our climate finance portfolio.

By 2030, ING REF wants to have its entire financed commercial real estate portfolio with an A energy label



Step 1 **ING REF** advises

Step 2

ING REF finances sustainability



Step 3 **ING REF** connects



Step 4 **ING REF** appreciates



Step 5 **ING REF**

compensates

 To help professional real estate investors with both office buildings and other commercial real estate with an energy label D to G, Business Banking Real Estate Finance Netherlands (ING REF) offers a discounted interest rate on the loan for sustainability if these real estate owners make the jump to energy label A in one go

 With the discounted interest rate, ING REF wants to convince commercial real estate customers to immediately become more sustainable towards an A energy label

 ING REF wants to have provided its entire financed commercial real estate portfolio with an A energy label by 2030. ING does this with a five-step plan shown on the left

• For details of the five-step plan, please see the links in the footnote



Renewables

- The focus is on core technologies (solar, on/offshore wind and, selectively, geothermal), and a growing segment is battery storage, manufacturing, storage and ancillary services such as grid support
- ING's exposure in renewables has more than doubled and now makes up 60% of our power generation portfolio. We are aiming to grow new financing commitments of renewable energy by 50% by year-end 2025 compared to 2021

Residential Real Estate

- In Netherlands, houses with an Energy label A+ or above receive a 0.15% discount and A receive a 0.1% discount. Find more information here.
- In Germany, we offer interest rate discount of -10 bps on mortgages if the customer either new builds or purchases a new build from a developer.
- In Poland, we offer eco-mortgages for houses with a documented low energy consumption. Please visit <u>here</u> for more information.

ING has a strong Sustainability track record

Sustainability Ratings ING Groep N.V.



- Evaluation: Management of ESG material risk is 'Strong'
- Position: 17th percentile of 398 banks
- Updated: September 2021

MSCI

- Rating: AA
- Affirmed: December 2021

S&P Global

- ESG evaluation: Strong
- Score: 83/100
- Updated: January 2021

Sustainability Index Products

ING is regularly included in ESG and sustainability-focused indices.

Examples include:













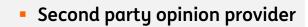
ING Green Bond issuance

Green Bond issuance objectives

- Support meeting our sustainability objectives
- Fund growth in our green asset portfolio
- Continued leadership in the Green Bond market
- Development of the Global Green Bond market
- Meet future MREL/TLAC requirements

External consultants & providers







Green buildings consultant



Renewable energy consultant



Green buildings consultant

Recent Green Bond transactions

Year of Issuance	2019	2020	2021	2021	2021	2022
Issuer	ING Bank Hipoteczny	ING Group N.V.	ING Group N.V.	ING Group N.V.	ING-DiBa AG	ING Group N.V.
Size / Currency	PLN 400 million	\$1 billion	£800 million	€500 million	€1.25 billion	€1.5 billion
Tenor	5yr	6NC5	8NC7	11NC6	7yr	4NC3
Funding Type	Covered Bond	HoldCo Senior	HoldCo Senior	Tier 2	Covered Bond	HoldCo Senior

ING Green Bond Framework

 We've updated our Green Bond Framework to meet higher standards on transparency and disclosure. This strengthens our sustainable debt strategy and contributes to a diversified investor base. The framework is now aligned with the ICMA Green Bond Principles 2021 and where possible with the EU Taxonomy (EUT) Regulation and the EUT Delegated Act.

1 Use of proceeds

- Eligible Green Loan Portfolio includes:
 - Renewable energy
 - Wind and Solar global
 - Green buildings
 - Residential Netherlands and Germany
 - Commercial Netherlands

Project Evaluation and Selection

- Projects financed and/or refinanced through Green Bond proceeds are evaluated and selected based on compliance with the Eligibility Criteria
- Governance of the green bond framework is stated
- ING's Environmental & Social Risk policies and transaction approval process ensures that loans comply with <u>environmental and social</u> <u>policies</u>



Management of Proceeds

- Portfolio based allocation approach
- Single pool of eligible green loans*:
 - Renewable energy ~€5.0 bln
 - Green buildings (residential) ~€17.0 bln**
 - Green buildings (commercial) ~€4.9 bln
 - Total Eligible Green Loan Portfolio ~€26.9 bln
- Green funding outstanding: ~€8.5 bln***

4 Reporting

- Aggregated (between multiple Green Bonds)
- Allocation and impact are reported. Additional reported items can be found in the Green Bond Framework
- GHG Emissions avoided / reduced for Eligible Green Loan portfolio: 3,560,478 ton CO₂







^{*}As per Allocation Report 31 December 2021

^{**} Includes €3.2bn eligible green loans within ING DiBa, as well as €13.8 bn of eligible green loans within ING Bank N.V., where the latter are not included in the Allocation Report 2021, but will be included going forward

Use of Proceeds

ICMA GBP categories

Eligibility criteria

Renewable Energy

Financing or refinancing of production of renewable energy:

- Solar energy
- On- and offshore wind energy



Financing or refinancing new or existing buildings: Green **Buildings**

- Buildings built before 31 December 2020 with EPC label ≥ 'A'
- Buildings built before 31 December 2020 belonging to the top 15% of the national building stock based on primary energy demand (PED)
- Buildings built after 31 December 2020 with energy performance at least 10% better than the threshold for Nearly Zero-Energy Buildings ('NZEB') in the local market²
- Buildings that have been refurbished, resulting in a reduction of primary energy demand (PED) of at least 30% and validated through an Energy Performance Certificate
- Buildings that have been refurbished meeting the criteria for major renovations under applicable building regulations, new, existing or refurbished commercial buildings which received at least one of the following certifications:
 - BREEAM 'Excellent' or above certification
 - LEED 'Gold' or above certification
 - DGNB certification 'Gold' and/or above
 - HQE 'Excellent' and/or above
 - Other equivalent internationally recognised Green Building certification

UN SDGs





Contribution to Contribution to FU Environmental objectives and economic activity¹

Substantial contribution to Climate Change Mitigation (Article 10)



- (4.1.) Electricity generation using solar photovoltaic technology
- (4.3.) Electricity generation from wind power

Substantial Contribution to Climate Change Mitigation (Article 10)

FU economic activities:

- (7.2.) Renovation of existing buildings
- (7.7.) Acquisition and ownership of buildings







- 1 Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending regulation (EU) 2019/2088. See here
- 2 ING may engage external consultants to define the top 15% and NZEB-10% in the context of the national building stock in the countries where any eligible green building assets are located. In countries where there is no definition of NZEB or there is no practical solution to implement NZEB, ING may choose to rely on the top 15% approach

Project evaluation and management of proceeds

 Projects financed and/or refinanced through Green Bond proceeds are evaluated and selected based on compliance with the Eligibility Criteria

1 Compliance with the Eligibility Criteria

- EU Taxonomy Regulation
- EU Taxonomy Climate Delegated Act
- Apply on a best efforts basis as long as there are feasible practical applications in the geographies where ING's assets are located (in terms of local regulation)

Governance of Green Bond Framework

- ING has established a Green Bond Steering Committee to:
 - Review and update the framework
 - Evaluate criteria such as eligibility and Do No Significant Harm
 - Oversee other governance processes

3 Environmental and Social Risk Management Policy (ESR)

- ING ensures that all eligible loans comply with official national and international environmental and social standards and local laws and regulations on a best effort basis
- ING's Environmental & Social Risk policies and transaction approval process ensure that loans comply with <u>environmental and social</u> <u>policies</u>

Wanagement of proceeds

- The proceeds from Green Finance Instruments will be managed by ING in a portfolio approach.
- Allocate the proceeds from Green Finance Instruments to an Eligible Green Loan Portfolio, selected in accordance with the Eligibility Criteria and evaluation and selection process
- Unallocated net proceeds from Green Finance Instruments will be held in ING's treasury liquidity portfolio, in cash or other short term and liquid instruments, at ING's own discretion



Allocation and impact report: Green buildings

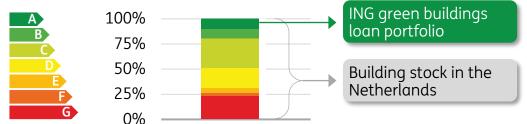
• The assets in the ING green building portfolio have energy label A, and belong to the top 15% of the most energy efficient of Dutch real estate market.

Use of Proceeds: green commercial buildings GOALS





Comparison of energy label in ING Green Buildings Loan Portfolio and average building stock in the Netherlands



Group composition ING green commercial buildings loan portfolio in the Netherlands

	#	m^2	Refurbished	New
Industry	207	602,180	155	52
Office	752	580,80	539	213
Retail	4,370	1,722,064	3,226	1,144
Residential building	9,056	799,513	4,029	5,027
Other	1,672	1,438,084	1,271	401
Total	15,850	4,539,741	9,065	6,785

Impact report: green commercial buildings



Total portfolio size	€4.851 bln
Avoided / reduced emissions per year	44,191 ton CO ₂ eq
Avoided / reduced emissions per mil € invested by ING	9.11 ton CO ₂ eq/ mil €

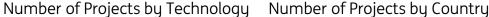
	Number	%	Portfolio CO ₂ - emission (ton CO ₂)	CO ₂ -emission Original building code (ton CO ₂)	CO_2 - emission Reduction (ton CO_2)
Refurbished buildings	9,066	57%	182,084	216,1608	34,024
New buildings	6,784	43%	85,800	95,967	10,167
Total	15,850	100%	267,885	312,075	44,191

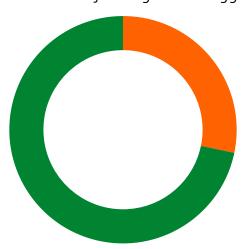
Definition: The assets in the ING green building portfolio have energy label A, and belong to the top 15% of the most energy efficient of Dutch real estate market. The portfolio is dynamic and may be expanded in the future with similar buildings in other countries

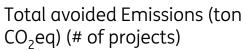
Allocation and impact report: renewable energy (Global)

Use of Proceeds: renewable energy*

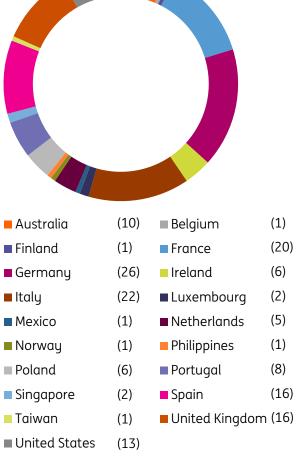












Impact report: renewable energy (Global)*

Guidehouse
Outwit Complexity

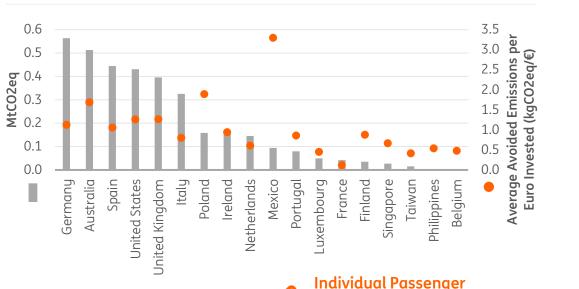
Total portfolio (share ING)

ING) €4.968 bln

Avoided emissions solar + wind 3,474,656 ton CO₂eq

Avoided emissions per € invested by ING 1.0 kg CO₂eq/ euro

Avoided emissions (lhs) and avoided emissions per euro invested (rhs) by project country



3,474,656 (ton CO₂eq)



Individual Passenger journey from London to New York:
2.6 million**

^{*} Navigant (Guidehouse)

^{**} Assumption is 1.36tonCO2/per passenger journey

Second party opinion

ISS ESG ▷

EU Taxonomy Alignment Assessment

- As part of the Second Party
 Opinion, ING commissioned ISS ESG
 (the Second Party Opinion provider)
 to assess the alignment of the
 Green Eligible Assets (that ING
 Green Bonds finance) with the EU
 Taxonomy. ISS ESG concluded that
 based on robust processes for
 selection. ISS ESG concluded the
 nominated project categories are:
 - Aligned with the Climate Change Mitigation Criteria
 - Aligned with the Do No Significant Harm Criteria*
 - Aligned with the Minimum Social Safeguards requirements

Principles Alignment	Alignment with Green Bond Principles	Opinion
	 Use of Proceeds Process for Project Evaluation and Selection Management of Proceeds Reporting 	Positive
Asset Categories	Alignment with ISS ESG Green KPIs	Opinion
न् र ि	 Wind Power Solar Power Green Buildings 	Positive

Issuer's sustainability Performance

• ING is rated 11th out of 301 companies within the Commercial Banks & Capital Markets industry as of April 3rd 2022. This equates to a high relative performance, with a decile rank relative to industry group of 1, given that a decile rank of 1 indicates highest relative ESG performance out of 10.



^{*} Except for 7.2. Renovation of existing buildings – Water and Marine Resources; and for renewable power projects outside the EU, EEA and UK, ING meets some of the Do No Significant Harm Criteria

ING Green Eligible Assets - EU Taxonomy Alignment Summary

ING Green Bonds % Alignment with EU Taxonomy Based on Assessment by

ING Group	92.	. 6% aligned (€23.8bn / 25.7bn total (Green Eligible Assets) 3)		
Eligible portfolio % aligned ING Diba Eligible portfolio % aligned	100% aligned (€3.2bn / 3.2bn total Green Eligible Assets) ³)				
Eligible Green Asset Category	Green Residential Buildings	Green Commercial Buildings	Renewable Energy (Solar & Wind)		
Economic Activity (Climate Change Mitigation)	7.7	7.7	4.1 & 4.3		
Geography	Germany + Netherlands	Netherlands	EEA + UK 65.2% of Renewables	Rest of World 34.8% of Renewables	
Technical Screening Criteria	Partial Alignment ¹⁾ 99.6% built <2021 (Aligned) 0.4% built ≥2021 (Partially Aligned) of which: ■ 7.6% < 5,000sqm (Aligned) ■ 92.4% ≥ 5,000sqm (Not Aligned)	Partial Alignment ¹⁾ 93.5% built <2021 (Aligned) 6.5% built ≥2021 (Partially Aligned) of which: ■ 61.7% < 5,000sqm (Aligned) ■ 38.2% ≥ 5,000sqm (Not Aligned)	Aligned	Aligned	
Do No Significant Harm	Aligned	Aligned	Aligned	Partially Aligned ²⁾	
Minimum Social Safeguards	Aligned	Aligned	Aligned	Aligned	

1 For buildings larger than 5000sqm and built ≥2021, ING currently lacks evidence to confirm compliance with the technical screening criteria. ING will, on a best efforts basis, indicate in its reporting what percentage of these buildings are able to meet the additional criteria of the EU Taxonomy Climate Delegated Act.

3 Outstanding amounts as of 31 December 2021.

² For assets outside of the European Economic Area (EEA) + UK region, ING is not able to provide specific documentation to substantiate full alignment with all the respective applicable DNSH criteria, which often relate to specific EU Directives. This is largely due to the misalignment with national regulations and the Equator Principles requirements with specific EU Directives & EU Taxonomy requirements. ING requires all project finance to be in compliance with the Equator Principles, where an Environmental and Social Impact Assessment (ESIA) is an integral part. In addition, ESG factors are built into ING's Environmental Social Risk assessment process. ISS ESG therefore concludes a 'partial alignment' assessment on DNSH for Renewables outside EEA and the UK.

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No representation is made as to the suitability of any green financial instrument to fulfil environmental and sustainability criteria required by prospective investors. Each potential purchaser of green financial instruments should determine for itself the relevance of the information contained or referred to in this framework or the relevant bond documentation for such green financial instruments regarding the use of proceeds and its purchase of green financial instruments should be based upon such investigation as it deems necessary.

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