



ING Green Bond

Allocation Report 2022

Financial Year 2022



do your thing

Contents

1. Introduction	3
2. ING Group Green Bond Allocation Report 2022	4
3. KPMG Limited Assurance Report	5

Introduction

ING's Sustainability Direction

There is no denying that one of the biggest challenges for society is sustainability, in all its forms. Climate change threatens both the planet and its people. People may struggle with inequality, poor financial health, and even a lack of basic human rights.

As the challenges increase, there's a growing sense of urgency that governments and businesses should step in and help tackle them. The world has changed, and banking needs to change with it.

ING aims to put sustainability at the heart of what we do, defining new ways of doing business where planet and people are just as important as economic growth. It's about making progress together, step by step.

ING wants to be a pioneer in defining new ways to do business. We want to be a banking leader in building a sustainable future for our company, our customers, society and the environment. How?

- We focus on [climate action](#):
 - We lead by example by striving for net zero in [our own operations](#).
 - We play our part in the social and low-carbon transformation that's necessary to achieve a sustainable future, [steering the most carbon-intensive parts of our portfolio](#) towards reaching net zero by 2050.
- We collaborate: working with clients to achieve their own sustainability goals, increasing our impact through [partnerships and coalition-building](#).
- We manage the most relevant [environmental and social risks](#) while fostering the protection of [biodiversity](#) and [human rights](#) across all of our relationships.
- We're working to advance [financial health](#) and inclusion for our customers and [communities](#).
- And we empower our employees to contribute to it all.

ING finances today's society, which means we do also finance things that aren't green. We want to help clients transition to a low carbon economy. It's about making progress together, step-by-step. See www.ing.com/climate for more on our climate strategy in action.

ING's Green Bond Framework

To support our sustainability strategy, and to meet green funding needs; ING issues green bonds, supported by our [Green Bond Framework](#) that aligns with the International Capital Market Association's (ICMA) Green Bond Principles (GBP). Under this framework, ING Group and its subsidiaries can issue any financial instrument to finance and refinance assets and projects which contribute to the UN's Sustainable Development Goals and our own sustainability strategy.

ING's Green Bond Allocation Report

ING publishes its allocation of net proceeds to the Eligible Green Loan portfolio (allocation report) annually.



Each eligible Green Category includes:

- The size of the identified Eligible Loan Portfolio, per Eligible Project Category;
- The total amount of proceeds allocated to the Eligible Green Loan Portfolio;
- The number of eligible loans;
- The balance of unallocated proceeds;
- The amount or the percentage of new financing and refinancing;
- The geographical distribution of the assets (at country level).

In 2022, the Eligible Green Loan Portfolio consists of Renewable Energy (wind and solar), Green Commercial Buildings from the Netherlands, and Green Residential Buildings from the Netherlands and Germany. In particular, the Residential Buildings portfolio from the Netherlands is a new portfolio added in 2022 consisting of 80,449 buildings totalling €17.3 bln.

Since the publication of the Green Bond Framework in 2015 and the first allocation report in 2016, our Eligible Green Loan Portfolio grew to €29.9 bln from €1.31 bln. We have also updated our Green Bond Framework to take into account the updated market and regulatory standards such as the EU Taxonomy, EU Delegated Acts and the updated ICMA Principles (June 2021), etc. We will continue to monitor the relevant regulatory and market developments and align our Green Bond Framework accordingly.

This Green Bond Allocation Report 2022 reflects the allocation and reporting requirements as stated in the Green Bond Framework 2022. The Green Bond Framework 2022 has been externally assessed by ISS ESG. In the [Second Party Opinion \(SPO\)](#), alignment with the Green Bond Principles (GBP) has been confirmed as well as additional reviews.



Assurance report of the independent auditor

To: the Executive Board of ING Groep N.V. and the holders of Green Bonds issued by ING Groep N.V.

Our conclusion

We have reviewed the Eligible Green Loan Portfolio as included in the ING Green Bond Allocation Report at 31 December 2022 of ING Groep N.V. based in Amsterdam (hereafter 'the information in the Report'). A review is aimed at obtaining a limited level of assurance.

Based on the procedures performed nothing has come to our attention that causes us to believe that the information in the Report is not prepared, in all material respects, in accordance with the reporting criteria as described in the 'Reporting criteria' section of our report.

Basis for our conclusion

We performed our review in accordance with Dutch law, including Dutch Standard 3000A 'Assurance-opdrachten anders dan opdrachten tot controle of beoordeling van historische financiële informatie (attest-opdrachten) (assurance engagements other than audits or reviews of historical financial information (attestation engagements)). This engagement is aimed to obtain limited assurance. Our responsibilities in this regard are further described in the 'Auditor's responsibilities' section of our report.

We are independent of ING Groep N.V. in accordance with the 'Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten' (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence). Furthermore, we have complied with the 'Verordening gedrags- en beroepsregels accountants' (VGBA, Dutch Code of Ethics). We believe the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Reporting Criteria

The information in the Report needs to be read and understood together with the reporting criteria. ING Groep N.V. is solely responsible for selecting and applying these reporting criteria, taking into account applicable law and regulations related to reporting.

The reporting criteria used for the preparation of the Eligible Green Loan Portfolio are the reporting criteria as described in the ING Green Bond Framework.

The Executive Board responsibilities

The Executive Board of ING Groep N.V. is responsible for the preparation of the Report including the Eligible Green Loan Portfolio in accordance with the reporting criteria as described in the 'reporting criteria' section of our report. It is important to view the Eligible Green Loan Portfolio in the context of these reporting criteria.



Furthermore, the Executive Board is responsible for such internal control as it determines is necessary to enable the preparation of the information in the Report that is free from material misstatement, whether due to fraud or error.

Auditor's responsibilities

Our responsibility is to plan and perform our review in a manner that allows us to obtain sufficient and appropriate assurance evidence for our conclusion.

Procedures performed to obtain a limited level of assurance are aimed to determine the plausibility of information and vary in nature and timing, and are less in extent, compared to a reasonable assurance engagement. The level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

We apply the 'Nadere Voorschriften Kwaliteitssystemen' (NVKS, Regulations for Quality management systems) and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have exercised professional judgement and have maintained professional skepticism throughout the review, in accordance with the Dutch Standard 3000A, ethical requirements and independence requirements.

Our review included, among other things, the following procedures:

- Identifying areas of the information in the Report where a material misstatement, whether due to fraud or error, are most likely to occur, designing and performing assurance procedures responsive to these areas, and obtaining assurance information that is sufficient and appropriate to provide a basis for our conclusion.
- Reviewing the second opinion from ISS ESG which addresses the applicability of the reporting criteria used in the preparation of the information in the Report.
- Reviewing the application of the reporting criteria used in the preparation of the Eligible Green Loan Portfolio in the Report.
- Obtaining an understanding of the reporting processes for the information in the Report, including obtaining a general understanding of internal control relevant to our review, in order to select assurance procedures that are appropriate in the circumstances, but not for the purpose of expressing a conclusion on the effectiveness of the company's internal control.
- Performing an analysis of the external environment and obtaining an understanding of the characteristics of ING Groep N.V. and themes and issues relevant for the Eligible Green Loan Portfolio.
- Interviewing relevant staff responsible for the Green Bond management and reporting.
- Interviewing relevant staff responsible for providing and consolidating the information in the Report.



— Evaluating internal and external documentation, based on limited sampling, to determine whether the information in the Report is plausible and in line with the reporting criteria.

Amstelveen, 11 May 2023

KPMG Accountants N.V.

T.P.D. Helsloot RA

Director