

Disclosure of management approach to material non-financial topics

The following describes ING's management approach to material non-financial topics. The list of topics and the process for identifying our material topics are available on [our website](#). All data referenced in this disclosure are as of year-end 2019, unless otherwise stated.

↳ SASB index table

↳ GRI index table

Digitalisation and interconnectivity

The world of banking is becoming increasingly digital, a transformation driven by the success of platforms. The world's most valuable companies are now based on platform business models. Platform leaders like Apple, Google, Amazon and Alibaba are defining the customer experience. We rely on innovation to develop disruptive products, services and experiences that can help ING become the leading go-to platform for financial services and beyond.

With a shift towards platform models, to be a 'player' in that space there are three positions a company can take:

- become a platform;
- provide "capability as a service";
- become a producer on third party platforms.

Successful companies often play across two or three positions. ING is also following this route combining these three different strategies. The first is to become a destination platform, the 'go-to place' for financial services and beyond, a place where consumers and producers interact. Here, we need to give them very good reasons to come to our platform, something very different from what they can get elsewhere.

Secondly, ING also invests in independent initiatives in their own right, outside of the abovementioned platform plays. The third way is to connect to the existing platforms of others. With more and more companies and people interacting on platforms, it is important for ING to continue to be where its customers are. Here, we can either provide capability as a service to other platforms or become a producer on a third-party platform.

Digitalization and interconnectivity are therefore essential to establishing a personal, instant, relevant and seamless experience across borders.

Almost all customer contact is now digital, and 80% of that is through mobile devices (2018: 72%)

Innovation

Innovation and transformation play crucial roles in ING transitioning to a platform business. We rely on innovation to develop truly disruptive products, services and experiences that can help ING become the leading go-to platform for financial services and beyond. Transformation enables sharing and scaling up of these innovations across our businesses, creating one user experience for all 38.4 million customers.

Recognised as one of Forbes magazine's most innovative companies, ING has a variety of ways of turning great ideas into products and services that customers really need. These include in-house innovations using the bank's EUR 25 million Innovation Fund, investing in and partnering with financial technology (fintech) companies via ING Ventures, as well as developing our own unique innovation method, PACE. Our approach is centred around two of our strategic priorities:

1. Increase the pace of innovation to keep satisfying customers' changing needs. These can vary widely from what customers expect from their bank, how they use our apps and services, to the kinds of products that help them be successful.

3,000+ employees trained on PACE, ING's way to innovate

2. Think beyond traditional banking by developing new banking services and business models that the industry, or even the world, has never seen before.

200+ fintech partnerships, including 67 partnerships started in 2019

ING has [Labs](#) in four cities around the world (Amsterdam, Brussels, London and Singapore) where we partner with others to bring disruptive ideas to market by combining our knowledge and network with their knowledge and skills. We provide a variety of ways of turning great ideas into products and services that customers really need. These include in-house innovations using the bank's EUR 25 million Innovation Fund, investing in and partnering with financial technology (fintech) companies via [ING Ventures](#), as well as developing our own unique innovation method, PACE.

EUR 300 million ING Ventures fund to drive innovation at ING and support entrepreneurs

Furthermore we focus on building a global foundation that standardises how we design and manage processes, our IT infrastructure, our Way of Working and how we store and analyse data. These processes support our aim to offer similar products and services everywhere.

Usability and accessibility of our products

Banking doesn't have to be difficult and time consuming. Clear products, plain language, fair prices and simple processes save customers time and money. ING promises to make banking clear and easy, to provide services anywhere, at any time and to keep getting better.

Across ING, digital channels account for almost all contact with retail customers and over a third of our customers only interact with us through a mobile device. Given the rise of digitalisation, and growing competition from disruptive newcomers to our sector, we want to do more than just live up to our Customer Promise. We want to surpass people's expectations.

We want to use our insights from our 4.5 customer interactions to offer a personalised and empowering experience, giving them even more reasons to interact with us. This is how we can differentiate ING from other banks and become an essential part of people's digital lives (see [ING Investor Day 2019: Think Forward: staying a step ahead](#)).

ING launched initiatives to maximise cross-buy opportunities and improve our client-service delivery with consistent products and a one-client approach everywhere. In Wholesale Banking, for example, we brought together various client trading activities and further integrated the Financial Markets business into our client organisation with a new sales model. In Retail Banking, in 2019 we enhanced the experience of our mobile app users in the Netherlands, Germany, Romania and Spain with Apple Pay, after introducing it earlier in Australia and Poland, and we introduced instant payments in the Netherlands and Belgium with funds credited to beneficiary accounts within 10 seconds.

One of the ways we measure customer experience is the Net Promoter Score, which scores customer satisfaction and loyalty (whether they would recommend ING to others). The score is calculated as the difference between the percentage of promoters (who rate ING as 9 or 10 out of 10) and detractors (those scoring ING below a 6). Our aim is to achieve a number one NPS ranking in all our Retail markets, with a 10-point lead over our main competitors.

Ranked 1st in seven out of 14 retail markets (2018: seven out of 13 retail markets)

Another indication of customer satisfaction with our products is the number of customers who use ING as their primary bank.

Retail Banking primary relationships reached 13.3 million in 2019 (2018: 12.5)

IT systems and platforms

Ensuring the availability of our IT systems and platforms is key to living up to our customer promise - anytime and anywhere. Therefore, we continue to invest in a flawless and seamless customer experience, but also in the security and stability of our IT systems.

99.9% Wholesale Banking system availability globally (2018: 99.9%)

99.7% Retail Banking system availability in the Netherlands and Belgium (2018: 99.7%)

The ING Private Cloud (IPC) is the digital platform used to store and process data and IT services such as mobile phone apps. IPC standardizes our IT infrastructure, simplifies and streamlines existing processes, and brings an automated and self-service infrastructure to development and operations teams.

The IPC has reduced our infrastructure time-to-delivery from an average of more than 10 days to less than an hour. In 2019, we expanded the service portfolio to support further onboarding in the IPC and doubled global adoption of IPC, from around seven percent of global infrastructure in 2018 to around 15 percent by the end of 2019.

Distributed ledger technology (DLT) can be used in products to improve privacy and security of transactions on the blockchain platform. Our investments in IT systems also strengthen our application of our Know Your Customer (KYC) programme. We are rolling out a bank-wide KYC digital service and fulfilling client acceptance and maintenance life cycle on one global digital platform.

The governance of our local and global applications and IT platforms is part of ING's risk and control structure. The COO function is responsible and accountable for proper security and controls on the platforms servicing ING and implementing proper processes. Also, in 2019 we further standardised and automated our User Access Management (UAM) processes and day-to-day practices.

Customer privacy and information security

ING recognises that information and underlying data are assets that are key, together with people, processes and IT systems, to further develop its digital profile. Discussions in society about data privacy and the tightening of data privacy legislation and regulations, such as embodied in the EU's General Data Protection Regulation (GDPR), are raising awareness of this important issue. At ING, we are committed to handling customer data safely and being open about how we use it.

As such ING has embraced multiple data management and governance initiatives. ING has embedded the Basel Committee on Banking Supervision Principles for Effective Risk Data Aggregation and Risk Reporting in risk data management and within our data governance framework. The framework outlines roles and responsibilities relevant for the risk lifecycle and data quality assurance. Please refer to [ING's Privacy Statement](#).

In 2019, ING set up a professional practice unit to establish an Enterprise Risk Management (ERM) Framework gatekeeper for policy design. Find more in the Risk Management chapter of our [2019 Annual Report](#).

User Access Management (UAM) is one of the focus areas for ING and an important element in our control framework to mitigate the risk of unauthorized and inappropriate access to systems, processes and the data and information contained therein. We continuously review, test and improve our UAM processes and controls to address ongoing developments in and outside ING. In 2019, ING further standardised, harmonised and automated the current processes and UAM controls. We will continue this journey in 2020.

The new European Payments Services Directive (PSD2) gives customers more choice by opening up payments and money management to new players, including non-banks. But PSD2 also obliges banks to share account information with licensed third parties if our customers authorise us to do so.

The GDPR became effective in May 2018. GDPR affords greater protection to individuals and requires more control on data and transparency regarding the use of data by companies. In 2019, ING continued its central programme, initiated in 2016, in a continuing effort to mature our data protection standards in line with GDPR standards.

When it comes to data ethics, ING acknowledges the importance of respecting the expectations of its stakeholders when new processes or products are introduced to enhance the customer experience. ING's data ethics approach is an integral part of our decision-making process and is embedded in ING's Orange Code. It consists of data ethics values and principles that apply to everyone in our organisation. To ensure the prudent use of data, there are local and global Data Ethics Councils to help manage data-related dilemmas and ensure our decisions are aligned with the values and behaviours in [ING's Orange Code](#).

We have developed a new e-learning module for all employees underlining the importance of data, rolled out in early 2020. Please refer to [ING's stance on data ethics](#).

Cyber resilience

ING has embedded controls and monitoring mechanisms in our overall internal control framework. These are continuously re-assessed against existing and new threats. The identification and monitoring of new threat actors and campaigns relevant to ING also informs this process as does the closer alignment between IT security and fraud teams. In addition, ING continues to strengthen its global cybercrime and fraud resilience through extensive collaboration with financial industry peers, law enforcement authorities, government (e.g. National Cyber Security Centre) and internet service providers (ISPs).

Concerns over the potential impact of insider threats continues to increase with specific information relating to external instances or trends in the financial industry remaining limited, albeit collaboration within the financial sector is improving.

The increasing use of third party vendors for services and the implementation of PSD2 are likely to present ongoing fraud management and IT security challenges; both in the short- and medium-term as criminal actors target financial and broader PII data outside the traditional banking environment.

Dealing with current and emerging fraud threats effectively requires continuous improvement of fraud management capabilities such as real-time transaction and response capabilities and better alignment and standardisation of cross border fraud management across ING and related platforms as well as exchanging data cross border. With legislation such as EBA PSDII and the continuing emphasis on duty of care, financial institutions are becoming more and more responsible for losses incurred by clients, and taking on more of the burden of reclaiming those losses.

Cyber-attacks are becoming more frequent, and more intense. At the same time, banks are becoming more exposed as they digitalise, rely more on cloud computing, and are increasingly connected to third-party providers. ING is regularly the target of cyber-attacks, like Distributed Denial of Service (DDoS), targeted attacks (also called Advanced Persistent Threats) and ransomware.

Managing exposure to IT risks is therefore a priority for us. It's a skillset we have to master to the same level of expertise as financial risk management. We focus strongly on managing exposure to potential risk while increasing the efficiency and effectiveness of our IT structure and continuity of IT processing.

Central in our approach is our dedicated Cyber Crime Expertise and Response Team which enhances the control environment to protect, detect and respond to e-banking fraud, DDoS and targeted attacks. Controls and monitoring continue to be embedded in the organisation as part of the overall internal control framework and are continuously re-assessed against existing and new threats. The identification and monitoring of new threat actors and campaigns relevant to us also informs this process as does the closer alignment between IT security and fraud teams.

ING also continues to strengthen global cybercrime and fraud resilience through extensive collaboration with financial industry peers, law enforcement authorities, government (e.g. National Cyber Security Center) and internet service providers (ISPs).

During 2019, no major cyber security incidents occurred

The volume and duration of DDoS attacks is increasing, especially in Belgium, the Netherlands and Romania. One of those DDoS attacks in Romania meant customers could not access our services for a couple of hours. No customer claims were made, nor any financial losses incurred.

Culture, ethics and integrity

To protect our customers, society and our bank from financial economic crime (FEC), we need to know who we do business with. ING has implemented a set of policies, programmes and minimum standards in the areas of Know-Your-Client (KYC) and Financial Economic Crime (FEC). Find more about FEC and KYC measures at ING on [our website](#).

ING has implemented policies and programmes to ensure our employees operate with the highest level of integrity. These include:

- [Orange Code](#)
- [Zero tolerance stance on bribery and corruption](#)
- [Financial economic crime statement](#)

Having a strong compliance culture and promoting integrity-led behaviour are key to reducing potential risks. ING's Orange Code provides guidance, and living up to the Orange Code is a substantial part of performance management within ING. ING furthermore encourages an open culture of timely and continuous feedback, as part of performance management.

In addition, ING introduced the Orange Code dilemma model in 2017 to support well-balanced and integrity-led decision-making. In 2019, the model was incorporated into existing decision-making processes and experts were trained globally to support the organisation in applying the model. A behavioural risk team set up within ING in 2018 continued to perform additional behavioural risk assessments, develop interventions to support management and enhance behavioural risk management within ING.

ING continues to have a whistleblower channel in place. Also open to third parties, it allows for the anonymous reporting of concerns, including those related to breaches of national and international business-conduct regulations, as well as our own policies and procedures. Our whistleblower policy protects informants from retaliation. Furthermore, ING has commissioned a third-party provider to maintain a 24/7 confidential reporting channel for informants who may wish to remain anonymous.

- [ING Whistleblower policy](#)
- [ING Whistleblower channels](#)

ING tracks the number and types of good-faith reports submitted via our whistleblower channels. The reporting is in ING's [Additional Pillar III Reports](#).

Climate change

Following the [Katowice Commitment](#), ING and 30 other banks signed in September 2019 the UN-backed [Collective Commitment to Climate Action](#). By adopting a common goal, the banks committed to align their portfolios to the low-carbon economy required to limit global warming to well-below 2 degrees Celsius, striving for 1.5 degrees. Please refer to our approach to [climate action](#) and our approach to [climate governance](#).

To this end, ING is measuring and steering our portfolio toward the Paris Agreement's well-below two-degree goal through our [Terra approach](#). We focus on the sectors in our loan book that are responsible for most greenhouse gas emissions: power generation, fossil fuels, automotive, shipping, aviation, steel, cement, residential mortgages and commercial real estate. We will measure and benchmark whether our lending in each sector is in line with the Paris Agreement goals. For our sector-level performance please refer to the Climate Alignment Dashboard in our [2019 Terra Progress Report](#).

In Wholesale Banking, we aim to grow our funding to organisations that help combat climate change and positively impact society and the environment. This includes ramping up funding to projects that advance renewable energy, low-carbon buildings, low-carbon transport, the circular economy. At the same time, we leverage a number of green and sustainable finance instruments to incentivizing our Wholesale Banking clients to become more sustainable. This includes green and sustainability bond services, sustainability improvement loans and green loans.

- Sustainable finance [solutions](#)

- Sustainable finance [publications](#)

EUR 18.7 billion in Climate Finance (2018: EUR 16.5 billion)

For a detailed breakdown of our Climate Finance portfolio please refer to [our website](#).

While we pursue the opportunities presented by climate change we also aim to address the risks. In 2017 ING [announced](#) an accelerated coal finance exit, aiming for near-zero exposure 2025. For our performance reporting please refer to ING's [Annual Report 2019](#) (Non-financial appendix).

22% year-on-year reduction in lending to coal-fired power plants (2018: 49% y/y reduction)

Furthermore, ING has implemented a global [Environmental and Social Risk \(ESR\) policy](#) framework. As of 2019, the ESR framework includes an environmental risk policy. Environmental risk is furthermore integrated into our sector-specific ESR requirements. Of all engagements in scope of the ESR policy framework in 2019, 85% were considered low risk, 9% medium risk and 6% high risk. For a full breakdown of all ESR advice please refer to the Risk Management chapter in ING's [Annual Report 2019](#).

85% of ESR risk assessments were low risk (2018: 81%)

ING is implementing the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD). We've made good progress in 2019 and continue to expand our application across more TCFD recommended disclosures. ING collaborates with peers in the UNEP FI TCFD banking pilot. We continue to share experiences and learning with the secretariat and other banks. Please refer to our TCFD progress report in the Risk Management chapter of ING's [Annual Report 2019](#).

Sustainability Accounting Standards Board (SASB) Commercial Banks (FN-CB) Standard

Disclosure Topic	Accounting Metric*	Metric Code	Disclosure reference
Systemic Risk Management	Global Systemically Important Bank (G-SIB) score, by category	FN-CB-550a.1	ING Bank Additional Pillar III Report 2019 - Navigation map
	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	FN-CB-550a.2	ING Group Annual Report 2019 - Risk Management - Stress testing; ING Group Annual Report 2019 - Risk Management - Climate change risk, Task Force on Climate-Related Financial Disclosures (TCFD)
Incorporation of ESG Factors in Credit Analysis	Commercial and industrial credit exposure, by industry	FN-CB-410a.1	ING Group Annual Report 2019 - Risk Management - Credit risk portfolio per economic sector and application of ESR framework; ING lending portfolio overview (NAICS 4 Digit Subsector) is available for download at ing.com/Sustainability/Our-Stance/Transparency.htm
	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis 📄	FN-CB-410a.2	ING Group Annual Report 2019 - Risk Management - Environmental and Social Risk Framework; ING Group Annual Report 2019 - Non-financial appendix - ESR policy in practice, Responsible finance, Sustainable investment services; ING 2018 Equator Principles reporting, available at equator-principles.com/reporting-ing-bank-n-v-2018 ING Environmental and Social Risk (ESR) policy framework, available for download at ing.com/Sustainability/Sustainable-business/Environmental-and-social-risk-policies.htm ING sustainability governance, available at ing.com/Sustainability/Sustainability-direction/Sustainability-governance.htm ING Group Annual Report 2019 - Our business - Responsible finance Our stance on sensitive topics, available at ing.com/Sustainability/Our-Stance.htm ING Group Annual Report 2019 - Risk Management - Credit risk portfolio per economic sector and application of ESR framework; ING Group Annual Report 2019 - The world around us
Data security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	FN-CB-230a.1	ING Group Annual Report 2019 - Innovation and transformation - Cyber security incidents in 2019 ING Group Annual Report 2019 - Innovation and transformation - Preventative measures
	Description of approach to identifying and addressing data security risks 📄	FN-CF-230a.2	ING Group Annual Report 2019 – Developments in risk and capital management - Data, privacy and cybersecurity ING Group Annual Report 2019 - Risk management - Cybercrime ING Group Annual Report 2019 - Innovation and transformation - Preventative measures
Financial Inclusion and Capacity Building	N/A	N/A	In line with the SASB Application Guidance, the topic of Financial Inclusion and Capacity Building and its associated metrics were omitted based on the lack of applicability. Please refer to our approach to financial health at ing.com/Sustainability/Sustainability-direction/Financial-health.htm
Business ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	FN-CB-510a.1	ING Group Annual Report 2019 - Consolidated financial statements - Note 46 Legal proceedings
	Description of whistleblower policies and procedures 📄	FN-CB-510a.2	ING Group Annual Report 2019 - Developments in risk and capital management - Whistleblower policy; ING Bank Additional Pillar III Report 2019 - Whistleblower; Whistleblower policy, available at ing.com/About-us/Compliance/Whistleblower-Policy.htm

Global Reporting Initiative (GRI) Standards: Core

Standard	Disclosure	Chapter and section reference in ING Annual Report 2019, unless otherwise stated	Direct Disclosure or Reason for Omission
GRI 102: GENERAL DISCLOSURES 2019			
1. Organizational profile			
102-1	Name of the organization	Report front cover Corporate Governance	
102-2	Activities, brands, products, and services	Strategy – How we create value	To best of our knowledge, ING did not sell any banned or disputed products in 2019.
102-3	Location of the organization’s headquarters	General information	
102-4	Number of countries operating	ING at a glance	
102-5	Nature of ownership and legal form	Corporate Governance (introduction)	
102-6	Markets served	ING at a glance Our business – our markets	
102-7	Scale of the reporting organization	ING at a glance Our people (number of employees) Annual Accounts Non-financial appendix	
102-8	Information on employees and other workers	Non-Financial Appendix – Our people	
102-9	Supply chain		As a financial services provider, the main elements of our supply chain are related to products and services that support our operations. These includes facility services and logistics, building maintenance and projects, IT systems – hardware and software, insurance, lease cars and business travel, marketing and communications support and other professional services. We disclose our policy and progress in the area of sustainable procurement in the Non-financial appendix.
102-10	Significant changes to the organization and its supply chain	Our business – Platform thinking (acquisitions)	
102-11	Precautionary Principle or approach	Our business – Responsible finance Risk Management – Environmental and social risk management	
102-12	External initiatives	Our business - Responsible finance Our people – Commitment to human rights	
102-13	Memberships of associations	Non-financial appendix – Stakeholder engagement, engagement cases Risk Management – Developing international best practice and stakeholder engagement	Overview of memberships and commitments available at ing.com/Sustainability/The-world-around-us-1/Memberships.htm
2. Strategy			
102-14	Statement from senior decision-maker	CEO statement	
3. Ethics and integrity			
102-16	Values, principles, standards, and norms of behavior	The world around us – A culture of trust Our strategy and how we create value – Performance culture	
4. Governance			
102-18	Governance structure	Corporate Governance Non-financial appendix – sustainability governance	

5. Stakeholder Engagement			
102-40	List of stakeholder groups	The world around us – KYC and anti-money laundering Non-financial appendix – Stakeholder engagement Risk Management – Developing international best practice and stakeholder engagement	
102-41	Collective bargaining agreements	Non-financial appendix	
102-42	Identifying and selecting stakeholders	Non-financial appendix – Stakeholder engagement	
102-43	Approach to stakeholder engagement	Non-financial appendix – Stakeholder engagement	
102-44	Key topics and concerns raised	Non-financial appendix – Stakeholder engagement, engagement cases Risk Management – Developing international best practice and stakeholder engagement	
6. Reporting practice			
102-45	Entities included in the consolidated financial statements	Consolidated annual accounts	
102-46	Defining report content and topic Boundaries	About this report Non-financial appendix – Understanding what matters most	
102-47	List of material topics	Non-financial appendix – Understanding what matters most	
102-48	Restatements of information		There have been no restatements
102-49	Changes in reporting	Non-financial appendix – Understanding what matters most	
102-50	Reporting period	About this report	
102-51	Date of most recent report	About this report	
102-52	Reporting cycle	About this report	
102-53	Contact point for questions regarding the report	About this report	
102-54	Claims of reporting in accordance with the GRI Standards	About this report	
102-55	GRI content index	GRI Content Index	
102-56	External assurance	About this report – Assurance Report of the Supervisory Board – Financial and risk reporting Report of the Supervisory Board – Audit Committee meetings Corporate Governance – External auditor	
Topic Specific Standards			
Material topic: Financial performance			
DMA	Disclosure on management approach	CEO statement Our strategy and how we create value Corporate governance Consolidated annual accounts	
GRI 201-1	Direct economic value generated and distributed	Consolidated annual accounts	
SASB FN-CB-550a.1.	Global Systemically Important Bank (G-SIB) score, by category	See SASB index table	
Material topic: Climate change			
GRI 305: EMISSIONS	Disclosure on management approach	Our business – Responsible finance Our business – Responsible finance Risk Management – Environmental and Social Risk Management Non-Financial Appendix – Sustainability governance Non-Financial Appendix – Environmental programme Non-Financial Appendix – Carbon emissions data Performance highlights	
GRI 305-1	Direct greenhouse gas (GHG) emissions (Scope 1)	Non-Financial Appendix – Carbon emissions data	
GRI 305-2	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	Non-Financial Appendix – Carbon emissions data	
GRI 305-5	Reduction of GHG emissions	Non-Financial Appendix – Environmental programme Non-Financial Appendix – Carbon emissions data	

ING	Lending portfolio CO2e intensity	2019 Terra Progress report, page 11	
ING	Climate finance – lending for positive climate impact	Performance highlights 2019	
ING	Lending to industry ESG leaders	Our business – sustainable business, responsible finance	
SASB FN-CB-4101a.2.	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	See SASB index table	
Material topic: Customer privacy & information security			
GRI 418	Disclosure on management approach	Elements of our strategy - Develop data analytics The world around us - A data driven world Innovation and Transformation - Security Innovation and transformation - Data Innovation and transformation - Open banking Developments in risk and capital management - Data, privacy and cybersecurity Risk profile - Cybercrime Elements of our strategy - Develop data analytics Innovation & Transformation - Security, Preventative Measures	
GRI 418-1	Substantiated complaints regarding breaches of customer privacy and losses of customer data	Innovation and transformation - Cyber security incidents in 2019	In 2018 ING had some dealings with data protection authorities regarding ING's processing of personal data. None of these led to proceedings with a significant effect on the financial position, profitability or reputation of ING such that they would warrant disclosure in the Annual Report. ING aims to continue to improve its disclosures on customer privacy and cyber resilience.
SASB FN-CF-220a.2	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	See SASB index table	
Material topic: Cyber resilience			
DMA	Disclosure on management approach	Developments in risk and capital management - Data, privacy and cybersecurity Risk management - Cybercrime The world around us - Cybersecurity	
SASB FN-CF-230a.3	Description of approach to identifying and addressing data security risks	See SASB index table	
ING	Description of preventive measures in place for ING data centres and organisational resilience	Innovation and transformation - Preventative measures	
ING	Number of cybersecurity incidents	Innovation and transformation - Cyber security incidents in 2019	
Material topic: Culture, ethics and integrity			
DMA	Disclosure on management approach	Our people - Business ethics and risk culture Developments in risk and capital management - Compliance Risk management - Risk culture The world around us - a culture of trust Business ethics and risk culture: % of employees covered by Bankers Oath Risk management - Monitoring Risk Culture Risk management - Compliance Risk - KYC enhancements in 2019 Risk, capital, funding and liquidity management - Managing risks to enable a sustainable business while strengthening culture and resilience Our people - Performance management	
ING	Programmes in place in response to incidents of corruption (number and description)	Developments in risk and capital management - Risk culture Risk management - Orange Code dilemma dialogue, Centre of	

		Expertise on Behavioural Risk Our people - Orange Code	
SASB FN-CB-510a.2.	Description of whistleblower policies and procedures	See SASB index table	
Material topic: Innovation			
DMA	Disclosure on Management Approach	The world around us - digital transformation Innovation and Transformation Our business	
ING	Number of investments made from the Venture Capital Fund	Innovation and transformation - Innovation Fund Innovation and transformation - Fintech partnerships and ING Ventures	
ING	Number of Fintech partners	Innovation and transformation - Partnerships started and stopped	
ING	Number of employees that followed the PACE Everyday training programme	Innovation and transformation - PACE - ING's way to innovate	
Material topic: IT systems & platforms			
DMA	Disclosure on Management Approach	Our business - Platform thinking Innovation and Transformation - Reliability and stability Performance highlights 2019	
ING	System availability	Performance highlights 2019	
Material topic Digitalisation & interconnectivity			
DMA	Disclosure on Management Approach	CEO statement The world around us - Digital transformation Our business - Our digitalisation journey Our people - Digitalisation and the changing organisation Innovation and transformation Our strategy and how we create value	
ING	% of customer contact that is digital	CEO statement	
ING	% of customer contact that is digital through mobile devices	CEO statement	
Material topic Usability & accessibility			
DMA	Disclosure on Management Approach	Our strategy and how we create value - Strategic priorities	
ING	Number of primary customers	Performance highlights 2019	
ING	Net Promotor Score	Performance highlights 2019 Our business - customer promise	