

Technical Appendix:

Global Reporting Initiative (GRI) Table

Sustainability Accounting Standards Board (SASB) Table

Environmental Programme

UNEP FI PRB

Global Reporting Initiative (GRI) Table

Standard	Disclosure	Chapter and section reference in ING Group Annual Report 2022 (unless stated otherwise)	Direct Answer or Reason for Omission
Statement of use	ING has reported the information cited in this GRI content index for the period 1 January to 31 December 2022 in accordance with the GRI Standards 2021.		
GRI 1 used	GRI 1: Foundation 2021		
GRI 2: General Disclosures 2021			
GRI Standard Title			
1. Organizational profile			
2-1	Organizational details	Introduction - About this report (p.3) Introduction - ING at a glance (p. 5 and p. 6)	
2-2	Entities included in the organization's sustainability reporting	Our leadership and corporate governance - ING's legal and management structure (p. 65) Consolidated financial statements, note 35: Information on geographical areas (p. 246 and p. 247)	
2-3	Reporting period, frequency and contact point	Introduction - About this report - Approach to integrated reporting (p. 3) Strategy and performance - Sustainability at the heart - Climate action (p. 24) Strategy and performance - Sustainability at the heart - Climate action - Terra approach (p. 27)	
2-4	Restatements of information		We have no restatements of information from previous reporting periods to report.

2-5	External assurance	<p>Introduction - About this report – Report content and materiality - Assurance (p. 4)</p> <p>Our leadership and corporate governance – External auditor (p. 75)</p> <p>Other information and appendices - Assurance report of the independent auditor (p. 310)</p> <p>https://www.ing.com/About-us/Corporategovernance/Auditors.htm</p>	
2. Activities and workers			
2-6	Activities, value chain, and other business relationships	<p>Introduction - ING at a glance - How we create value (p. 6 and p. 7)</p> <p>Strategy and performance - Superior Customer Experience (p. 20 – p. 23)</p>	
2-7	Employees	<p>Strategy & performance – How we are making the difference - Unlocking our people's full potential (p. 41 – p. 44)</p> <p>Strategy & performance - How we are making the difference - ING's workforce the numbers (p. 45)</p>	
2-8	Workers who are not employees		<p>ING does not disclose the total number of workers who are not employees and whose work is controlled by the organization, since this information and related metrics are not used internally. We disclose information on our employees in the 'Unlocking our people's full potential' chapter on page 41 of the Annual Report 2022 and further.</p>

3. Governance			
2-9	Governance structure and composition	<p>Our leadership and corporate governance – Our leadership, members of the Supervisory Board (p. 54)</p> <p>Our leadership and corporate governance - Supervisory Board report (p. 55 - p. 64)</p> <p>Our leadership and corporate governance – Corporate governance (p. 66 - p. 70)</p>	
2-10	Nomination and selection of the highest governance body	<p>Our leadership and corporate governance - Supervisory Board report - Nomination and Corporate Governance Committee (p. 61)</p> <p>Our leadership and corporate governance – Corporate governance - Supervisory Board (p. 67 - p. 69)</p> <p>Our leadership and corporate governance – Corporate governance - General Meeting (p. 70)</p>	
2-11	Chair of the highest governance body	<p>Our leadership and corporate governance – Our chairman’s statement (p. 51 and p. 52)</p> <p>Our leadership and Corporate Governance - Our leadership, members of the Supervisory Board (p. 54)</p> <p>Our leadership and corporate governance - Supervisory Board report (p. 55 - p. 64)</p>	
2-12	Role of the highest governance body in overseeing the management of impacts	<p>Introduction - About this report (p. 3 and p. 4)</p> <p>Strategy and performance – The world around us - Stakeholder engagement (p. 14 and p. 15)</p> <p>Strategy and performance - Sustainability at the heart (p. 24- p. 35)</p> <p>Strategy and performance – Sustainability at the heart - ESG governance (p.35)</p>	

2-13	Delegation of responsibility for managing impacts	<p>Our leadership and corporate governance - Our chairman's statement - From ESG to diversity and inclusion (p. 52)</p> <p>Our leadership and corporate governance - Supervisory Board report - (Internal) Supervisory Board meetings (p. 54 - p. 59)</p>	
2-14	Role of the highest governance body in sustainability reporting	<p>Our leadership and corporate governance - Supervisory Board report - ESG Committee (p. 62)</p> <p>Risk Management - Risk governance (p. 106 - p. 108)</p> <p>Risk Management - Risk culture (p. 108 - p. 110)</p> <p>Risk Management - Risk cycle process (p. 110 - p. 111)</p>	
2-15	Conflicts of interest	<p>Our leadership and corporate governance:</p> <ul style="list-style-type: none"> • Supervisory Board report - Nomination and Corporate Governance Committee (p. 61) • Corporate governance -Transactions involving actual or potential conflicts of interest (p. 68 and p. 69) • Relevant positions pursuant to CRD IV / conflicting interests (p. 69) <p>Risk Management - Conduct compliance and ethics (p.180 and p. 181)</p>	
2-16	Communication of critical concerns.	<p>Risk management - Environmental, social and governance risk (p. 166- p. 173)</p> <p>Consolidated financial statements, note 45: Legal proceedings (p. 285 - p. 287)</p>	

2-17	Collective knowledge of the highest governance body	Our leadership and corporate governance – Our leadership, members of the supervisory board (p. 54) Our leadership and corporate governance – Supervisory Board report - Permanent education including exchange with the business (p. 57)	
2-18	Evaluation of the performance of the highest governance body	Our leadership and corporate governance - Supervisory Board report - Internal Supervisory Board meetings (p. 58)	
2-19	Remuneration policies	Our leadership and corporate governance - Supervisory Board report (p. 54 and p. 55) Our leadership and corporate governance - Supervisory Board report - (Internal) Supervisory Board meetings (p. 55 and p. 57)	
2-20	Process to determine remuneration	Our leadership and corporate governance - Supervisory Board report - Remuneration Committee (p. 61)	
2-21	Annual total compensation ratio	Our leadership and corporate governance - Remuneration Report (p. 76 – p. 99)	
4. Strategy, policies and practices			
2-22	Statement on sustainable development strategy	Strategy and performance – In conversation with our CEO (p. 12 and p. 13) Our leadership and corporate governance - Our chairman's statement (p. 50 and p. 51)	

2-23	Policy commitments	<p>Strategy and performance – Sustainability at the heart – Climate action (p. 24 - p. 31)</p> <p>Strategy and performance – Sustainability at the heart – Collaboration (p. 31)</p> <p>Strategy and performance – Sustainability at the heart – Managing climate-related, environmental and social risk – (p. 31 - p. 33)</p> <p>Strategy and performance – Sustainability at the heart – ESG governance (p. 35)</p>	
2-24	Embedding policy commitments	<p>Risk management - Orange code and the Global Code of Conduct (p. 108 and p. 109)</p> <p>Risk Management – Environmental, social and governance risk (p. 166 - p. 168)</p> <p>Risk management - Compliance risk (p. 176 – p. 181)</p>	
2-25	Processes to remediate negative impacts	<p>Strategy and performance (p. 12 – p. 44)</p> <p>Risk Management – Environmental, social and governance risk (p. 166 - p. 173)</p> <p>Risk management - Compliance risk (p.176-181)</p> <p>We refer to our GRI 3 assessment in this Technical Appendix for more details and references.</p>	
2-26	Mechanisms for seeking advice and raising concerns	<p>Strategy and performance – How we are making the difference - Data privacy, protection and ethics (p. 40)</p> <p>Risk management - Compliance risk (p.176 and p. 177)</p> <p>Risk management – Compliance risk - Conduct compliance and ethics (p.180 – p. 181)</p>	

2-27	Compliance with laws and regulations	<p>Our leadership and Corporate Governance - Executive Board statement (p. 100)</p> <p>Consolidated financial statements, note 45: Legal proceedings (p. 285 – p. 287)</p>	
5. Stakeholder engagement			
2-28	Membership associations	<p>Strategy and performance – The world around us - Stakeholder engagement (p. 14)</p> <p>Strategy and performance - Sustainability at the heart (p. 24 – P. 27)</p> <p>Strategy and performance - Collaboration (p. 31)</p>	
2-29	Approach to stakeholder engagement	<p>Introduction – About this report (p. 3)</p> <p>Strategy and performance - The world around us (p. 14 and p. 15)</p> <p>Our leadership and corporate governance – Remuneration report Executive Board and Supervisory Board (p. 78)</p>	
2-30	Collective bargaining agreements		<p>In 2022, substantially all of the Group's Dutch employees have been subject to a collective labour agreement covering ING in the Netherlands.</p> <p>Our ambition is to report global percentages on this topic, but this is not yet available for 2022. Our aim is to include this information next year.</p>

GRI 3: Material topics 2022			
3-1	Process to determine material topics	Introduction - About this report (p. 3 and p. 4) Strategy and performance – The world around us (p. 14 – p. 15)	
3-2	List of material topics	Strategy and performance – The world around us - Materiality matrix (p. 16)	
<p>* Background on omissions reported:</p> <p>In 2021, GRI published an update to its 2016 Universal Standards. Using the Universal Standards 2021 is a requirement for all reporting published on 1 January 2023 or later. Regarding GRI 3 “Material Topics 2021”, we have followed and disclosed, in accordance with GRI 3-1, a detailed process to determine our material topics. In accordance with GRI 3-2, these material topics have been listed in our ING Group Annual Report 2022.</p> <p>The new GRI 3-3 2021 requires an extensive process where per business activity an identification of impacts, positive and negative, opportunities and risks is performed. We have included references to these positive and negative impacts in relation to GRI 3-3 in this technical appendix. Because we are of the opinion that our reporting with respect to the positive and negative impacts can be further enhanced and completed, we have reported an omission on certain identified material topics. ING will further enhance its reporting in 2023.</p>			
Material topic: Energy Transition			
Definition: The process of shifting the global energy system from fossil-fuel based energy production to low carbon and renewable energy production, in which we support our clients to make this transition.			
3-3	Management of material topics	Strategy and performance - Sustainability at heart (p. 24 – p. 36) For more detailed information on our energy transition, we refer to our integrated climate report 2022 https://www.ing.com/MediaEditPage/2022-Climate-Report.htm	

3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.	<p>Strategy and performance – Sustainability at the heart (p. 24 – p. 33)</p> <ul style="list-style-type: none"> - Climate action - Terra approach - Managing climate-related Climate, environmental and social risk <p>Risk Management - Credit Risk (p. 117)</p> <p>Risk Management - Environmental, social and governance risk (p. 166)</p>	Omission reported *
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.		
3-3c	Describe its policies or commitments regarding the material topic.		
3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii - actions to manage actual and potential positive impacts.		
3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization’s operational policies and procedures.	Reference is made to the integrated climate report - transition pathways displayed on (p. 55 and further) https://www.ing.com/MediaEditPage/2022-Climate-Report.htm	

3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.	<p>Strategy and performance - sustainability at the heart (p. 24- p. 36)</p> <p>Risk Management - Environmental, social and governance risk (p. 166 - p. 173)</p>	
Material topic: Environmental and social due diligence			
Definition: Including social and environmental risks in our client screening and engagement to ensure that the companies we finance have a minimal negative social and/or environmental impact, for example in relation to human rights, biodiversity, climate change and tax.			
3-3	Management of material topics	<p>Strategy and performance - Sustainability at heart (p. 24 - p. 36)</p> <p>Risk management - Environmental, social and governance risk (p. 166 - p. 173)</p>	
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.	<p>Strategy and performance - Sustainability at heart - Environment and Social Risk (p. 31)</p> <p>Risk Management - Environmental, social and governance risk (p. 166 - p. 173)</p> <p>Risk Management - Non-financial risk (p. 174 - p. 176)</p>	
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.	<p>Reference is made to the integrated climate report - Our approach to managing climate risk (p. 37 - p. 40)</p> <p>Reference is made to the integrated climate report - The ESR Framework (p. 41 - p. 43)</p> <p>https://www.ing.com/MediaEditPage/2022-Climate-Report.htm</p>	
3-3c	Describe its policies or commitments regarding the material topic.		Omission reported *

3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii - actions to manage actual and potential positive impacts.		
3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures.	Risk Management – Compliance risk - Conduct compliance and ethics (p. 180 and p. 181) Reference is made to the Human rights review report 2021/2022: https://www.ing.com/MediaEditPage/2022-Human-Rights-Review.htm	
3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.		
Material topic: Sustainable finance			
Definition: Financing clients who are driving social and environmental progress, for example by financing climate-resilient, low-carbon and circular solutions.			
3-3	Management of material topics	Strategy and performance - In conversation with our CEO (p. 12 and p. 13)	
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights	Strategy and performance - Sustainability at heart (24 and further) Risk management – Environmental, social and governance risk (p. 166 – p. 173) Risk management – Non-financial risk (p. 174 and p. 175)	Omission reported *

3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.	Risk management – Credit risk (p. 117 – p. 148) Risk management – Environmental, social and governance risk (p. 166 – p. 173)	
3-3c	Describe its policies or commitments regarding the material topic.		
3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii - actions to manage actual and potential positive impacts.	Strategy and performance - Sustainability at heart (p. 24 – p. 34) Environmental and social risk management: https://www.ing.com/Sustainability/Sustainable-business/Environmental-and-social-risk-policies.htm	
3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization’s operational policies and procedures.	Strategy and performance - Sustainability at heart (p. 24-p. 35) Reference is made to the integrated climate report – Sustainable finance (p. 83 – p. 85): https://www.ing.com/MediaEditPage/2022-Climate-Report.htm	
3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.	Climate adaption: https://www.ing.com/Sustainability/Sustainable-business/Climate-adaptation.htm	

Material topic: Ethics & Compliance			
Definition: Ensuring safe, secure and compliant banking and countering financial economic crime (e.g., money laundering, bribery, corruption) by performing customer due diligence and monitoring transactions.			
3-3	Management of material topics	<p>Strategy and performance – The world around us (p. 14 and p. 15)</p> <p>Strategy and performance - Our strategy (p. 19)</p> <p>Strategy and performance - How we are making the difference - Staying safe and secure (p. 39 - p. 40)</p> <p>Risk management - Compliance risk (p. 176 – p. 181)</p>	
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.	<p>Risk Management - Risk Culture (p. 108 – p. 110)</p> <p>Risk Management – Environmental, social and governance risk - Developments 2022 (p. 166 - p. 173)</p>	
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships and describe the activities or business relationships.	<p>Our leadership and corporate governance – Supervisory Board report (p. 55 and further)</p> <p>Risk Management - (p. 103 and p. 104)</p>	
3-3c	Describe its policies or commitments regarding the material topic.	<p>Strategy and performance - How we are making the difference - Staying safe and secure (p. 39 - p. 40)</p> <p>Risk Management - Risk Culture (p. 108 – p. 110)</p>	

3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii- actions to manage actual and potential positive impacts.	Risk Management – Environmental, social and governance risk - Developments 2022 (p. 166 and p. 167) Risk Management - Compliance risks (p. 176 – p. 181)	
3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization’s operational policies and procedures.	Risk Management - Risk Culture (p. 108 – p. 110) Risk management - KYC (p. 179) Risk Management - Compliance risks – KYC (p. 179 and p. 180) Risk management - Orange Code and the global Code of Conduct (p. 108)	
3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.	Risk Management - Compliance Risks (p. 176 – p. 181)	
205-1 Anti-corruption	Operations assessed for risks related to corruption	Risk Management – Financial crime risk (p. 104 and further) Risk Management - Compliance Risks (p. 176 - p. 179)	
206-1 Anti-competitive Behaviour	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	Our leadership and corporate governance – Executive Board statement (p. 100).	

307-1 Environmental Compliance	Non-compliance with environmental laws and regulations	Identified legal actions and/or non-compliance with environmental laws and/or regulations, if any, are disclosed in the Consolidated financial statements, note 45: Legal proceedings (p. 285 – p. 287).	
Material topic: Risk management			
Definition: Using our integrated risk management framework to manage all relevant financial and non-financial risks, including but not limited to top and emerging risks such as pandemics, climate risks, financial economic crime and geopolitical risks.			
3-3	Management of material topics	<p>Strategy and performance - How we are making the difference - Staying safe and secure (p. 39 – p. 40)</p> <p>Risk management (p. 103 – p. 185)</p> <p>Risk Management – Environmental, social and governance risk (p. 166 - p. 173)</p> <p>Risk Management - Risk Governance (p. 106 – p. 108)</p> <p>Risk Management - Risk Governance (p. 108 – p. 110)</p>	
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;		
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.		
3-3c	Describe its policies or commitments regarding the material topic.		
3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii - actions to manage actual and potential positive impacts.		
3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures.		

3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.		
Material topic: Data privacy and security			
Definition: Protecting customers' confidential information and managing threats from cyber-attacks or malware and wrongful exploitation of private or official data.			
3-3	Management of material topics	Strategy and performance - How we are making the difference – Staying safe and secure (p. 39 – p. 40)	
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.	Strategy and performance - Our operating environment (p. 17) Risk Management - Financial Crime Risk / Cybercrime (p. 105) Risk management - Non-financial risk (p. 174- p. 175) Risk management – Compliance risk (p. 176 – p. 181)	
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.	Strategy and performance - How we are making the difference – Staying safe and secure (p. 39 – p. 40)	
3-3c	Describe its policies or commitments regarding the material topic.		
3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii - actions to manage actual and potential positive impacts.	Risk Management - Financial Crime Risk / Cybercrime (p. 105) Risk management - Non-financial risk (p. 174- p. 175) Risk management – Compliance risk (p. 176 – p. 181)	

3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures.	Strategy and performance - Our operating environment (p 17), Risk Management - Financial Crime Risk / Cybercrime (p. 105)	
3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.	Risk management - Non-financial risk (p. 174- p. 175)	
Material topic: Fair and transparent products			
Definition: Providing fair and transparent information about the products and services that we offer and supporting customers with the right knowledge and tools to make informed decisions.			
3-3	Management of material topics	Introduction – ING at a glance – How we create value (p. 6 - p. 8) Strategy and performance - The world around us (p. 14 and p. 15) Strategy and performance - Superior customer experience (p. 20 – p. 23)	Omission reported *
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.	Strategy and performance – Sustainability at the heart – Climate action (p. 24 – p. 30)	
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.	Identified legal actions and/or non-compliance with environmental laws and/or regulations, if any, are disclosed in the Consolidated financial statements, note 45: Legal proceedings (p. 285 – p. 287)	
3-3c	Describe its policies or commitments regarding the material topic.		

3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii- actions to manage actual and potential positive impacts.	Risk Management - Conduct compliance and ethics (p. 180 and p. 181) Risk Management - Risk culture (p. 108 - p. 110)	
3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures.	Risk Management - Credit risk (p. 117 - p. 119)	
3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.		
Material topic: Financial performance			
Definition: Being a financially healthy, stable, resilient, and competitive company.			
3-3	Management of material topics		
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.		
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.		
3-3c	Describe its policies or commitments regarding the material topic.		

3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii- actions to manage actual and potential positive impacts.	Introduction – About this report, ING at glance and ING shares (p. 3 – p. 9) Strategy and Performance (p. 12 – p. 46) Consolidated financial statements (p. 188 – p. 296) Our leadership and corporate governance (p. 51 – p. 102) Risk Management (p. 103 – p. 185)	
3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization’s operational policies and procedures.		
3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.		
201-1 - Economic Performance	Direct economic value generated and distributed	Consolidated financial statements (p. 188 – p. 296) Note 34 and Note 35 – Segment Reporting (p. 241 – p. 248)	
201-2 - Economic Performance	Financial implications and other risks and opportunities due to climate change	<ul style="list-style-type: none"> • Strategy and performance – Sustainability at the heart (p. 24 – p. 36) • Risk Management – Stress testing (p. 112 and p. 113) • Risk Management – Climate and environmental risks in IFRS 9 models (p. 134) • Risk Management – Environmental, social and governance risk (p. 166 – p. 173) 	

201-3 – Economic Performance	Defined benefit plan obligations and other retirement plans	Note 1.19 - Other liabilities (p. 215 and p. 216) Note 36 - Pensions and other post-employment benefits (p. 248 – p. 251)	
201-4 – Economic Performance	Financial assistance received from government		ING has not received any government assistance or contributions in 2022. This disclosure requirement is therefore not applicable.
Material topic: Financial inclusion			
Definition: Ensuring accessibility and equality of opportunities to access financial services for all possible customers.			
3-3	Management of material topics		
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.		
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.	Strategy and performance - Sustainability at heart - financial health and inclusion (p. 33 and p. 34)	
3-3c	Describe its policies or commitments regarding the material topic.	Accessibility and Financial inclusion: Human rights review report 2022 (p. 13 – p. 40): https://www.ing.com/MediaEditPage/2022-Human-Rights-Review.htm	
3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii - actions to manage actual and potential positive impacts.	Accessibility: https://www.ing.com/Accessibility.htm	Omission reported *

3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures.	Strategy and performance – Staying safe and secure - Digital access (p. 39)	
3-3f	describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.		
Material topic: Diversity, inclusion and equity			
Definition: Creating an inclusive work culture with diverse teams, in which people can be themselves and are treated equally.			
3-3	Management of material topics	Strategy and performance - The world around us- Understanding what matters most (p. 14)	Omission reported *
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.	Strategy and performance - How we are making the difference - Unlocking our people's full potential (p. 41 - p. 44)	
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;	Human rights review report 2022 – Our workforce (p. 30 -43) https://www.ing.com/MediaEditPage/2022-Human-Rights-Review.htm	
3-3c	Describe its policies or commitments regarding the material topic.		

3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii- actions to manage actual and potential positive impacts.	Strategy and performance - How we are making the difference - Unlocking our people's full potential (p. 41 and p. 44)	
3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures.		
3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.		
401-1 Employment	New employee hires and employee turnover	Strategy and Performance - How we are making the difference: - Unlocking our people's full potential (p. 41 - p. 44) - ING's workforce (p. 45)	
405-1 Diversity and Equal Opportunity	Diversity of governance bodies and employees		
405-2 Diversity and Equal Opportunity	Ratio of basic salary and remuneration of women to men	Strategy and Performance - How we are making the difference - Unlocking our people's full potential - Gender pay gap analysis (p. 43)	Omission reported * The gender pay gap, in line with the geographical breakdown requirements specified by GRI, have not been disclosed due to data privacy constraints.

406-1 Non-discrimination	Incidents of discrimination and corrective actions taken	<p>Strategy and performance – – How we are making the difference - Data privacy, protection and ethics (p. 40)</p> <p>Risk Management – Compliance risk - Conduct compliance and ethics (p. 180 and p. 181)</p> <p>Human rights review report 2022 – Our workforce (p. 30 -43) https://www.ing.com/MediaEditPage/2022-Human-Rights-Review.htm</p>	Omission reported * The total number of incidents during the reporting period on discrimination have not been disclosed in accordance with GRI due to data privacy constraints.
Material topic: Customer experience			
Definition: Making banking personal, instant, seamless, relevant and accessible to enhance the customer experience.			
3-3	Management of material topics	<p>Introduction – ING at a glance (p. 5 - p. 8)</p> <p>Strategy and performance - Our strategy (p. 19)</p> <p>Strategy and performance - Superior customer experience (p. 20- p. 23)</p> <p>Strategy and performance – Sustainability at the heart – Financial health and inclusion (p. 33)</p> <p>Strategy and performance – How er are making the difference (p. 37 – p. 40)</p>	Omission reported *
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.		
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.		
3-3c	Describe its policies or commitments regarding the material topic.		
3-3d	Describe actions taken to manage the topic and related impacts, including: i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii - actions to manage actual and potential positive impacts.		

3-3e	Report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures.		
3-3f	Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.		
Material topic: Digitalisation			
Definition: Developing digital products and technologies and creating end-to-end digitalized products and processes to better serve our clients.			
3-3	Management of material topics	Introduction - Value Creation Model (p. 7 and p. 8) Strategy and performance - How we are making the difference (p. 37 - p. 40)	Omission reported *
3-3a	Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights.	Strategy and performance - Our operating environment (p. 17 and p. 18)	
3-3b	Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships.	Strategy and performance - Superior customer experience (p. 20 - p. 22) Strategy and performance - How we are making the difference (p. 37 - p. 40)	
3-3c	Describe its policies or commitments regarding the material topic.	Risk Management - Cybercrime (p. 105)	

3-3d	<p>Describe actions taken to manage the topic and related impacts, including:</p> <ul style="list-style-type: none"> i - actions to prevent or mitigate potential negative impacts; ii - actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii- actions to manage actual and potential positive impacts. 	<p>Risk Management – Cybercrime and fraud (p. 175)</p> <p>Risk Management - Innovation, analytics and digitalisation (p. 181)</p> <p>Digital access: https://www.ing.com/Accessibility.htm https://www.ing.com/MediaEditPage/2022-Human-Rights-Review.htm</p>	
3-3e	<p>Report the following information about tracking the effectiveness of the actions taken:</p> <ul style="list-style-type: none"> i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization’s operational policies and procedures. 		
3-3f	<p>Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective.</p>		

Sustainability Accounting Standards Board (SASB) Table

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 2022
	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.1.	ING Group Annual Report 2022 - Risk Management - Risk Governance (p. 106)
			ING Group Annual Report 2022 - Risk Management - Risk Appetite Framework (p. 110)
			ING Group Annual Report 2022 - Risk Management - Stress Testing (p. 112)
			ING Group Annual Report 2022 - Environmental, social and governance risk - Climate-related and environmental risk management (p. 166 - p. 173)
			ING ESR Framework - https://www.ing.com/Sustainability/Sustainable-business/Environmental-and-social-risk-policies.htm
			ING Climate Report 2022 - Our approach to managing climate risk - https://www.ing.com/MediaEditPage/2022-Climate-Report.htm

Disclosure topic	Accounting Metric	Metric Code	Disclosure Reference
Incorporation of ESG Factors in Credit Analysis	Commercial and industrial credit exposure by industry	FN-CB410a.0	ING Group Annual Report 2022 - Risk Management - Credit risk (p. 117 – p. 148)
	Description of approach to incorporation of environmental, social and governance (ESG) factors in credit analysis	FN-CB410a.1	ING Group Annual Report 2022 - Strategy and performance - Sustainability at the heart (p. 24 – p. 40)
			ING Group Annual Report 2022 - Risk Management - Environmental, social and governance risk (p. 166 – p.173)
			ING Equator Principles reporting - https://www.ing.com/Sustainability/The-world-around-us-1/Equator-Principles.htm
			ING ESR Framework - https://www.ing.com/Sustainability/Sustainable-business/Environmental-and-social-risk-policies.htm
			Our stance on ESG topics - https://www.ing.com/Sustainability/Our-Stance.htm
			ING Climate Report 2022 - Our approach to managing climate risk - https://www.ing.com/Newsroom/News/ING-publishes-climate-report.htm
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 2022 - How we are making the difference - Staying safe and secure (p. 39 and p. 40)
	Description of approach to identifying and addressing data security risks	FN-CF230a.2	ING Group Annual Report 2022 - How we are making the difference - Staying safe and secure (p. 39 and p. 40)
			ING Group Annual Report 2022 - Risk management - Non-financial risk (p. 174 – p. 175)

Disclosure topic	Accounting Metric	Metric Code	Disclosure Reference
Financial Inclusion and Capacity Building	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	FN-CB240a.1	<p>ING Group Annual Report 2022: Strategy and performance - Sustainability at the heart - Financial health and inclusion (p. 33 and p. 34).</p> <p>Strategy and performance - Sustainability at the heart (p. 24 - p. 36)</p> <p>Strategy and performance - How we are making the difference (p. 37 - p. 45)</p>
	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	FN-CB240a.2	
	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	FN-CB240a.3	
	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	FN-CB240a.4	
Business ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anticompetitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	FN-CB510a.1	ING Group Annual Report 2022 - Consolidated financial statements - note 45 Legal proceedings (p. 285)
	Description of whistleblower policies and procedures	FN-CB510a.2	ING Group Additional Pillar III Report 2022
			ING whistleblower policy - ing.com
			ING Group Annual Report 2022 - Risk Management - Conduct compliance and ethics (p. 180 and p.181)
		ING complaints procedure - https://www.ing.com/Sustainability/The-world-around-us-1/Equator-Principles.htm	

Environmental programme

We measure and manage the impact of our operations through our environmental programme. The environmental impact of our operations mainly consists of energy use in buildings and IT systems, business travel, waste and water.

Carbon emissions				
	2022	2021 ⁵	2020 ⁵	2014 ⁵
Coverage (% of employees) ⁶	98	95	98	91
Kilotonne CO2e				
Total carbon (including extrapolations)	29	26	29	106
Total CO2e (actuals) ¹	28	25	29	97
Total CO2e scope 1 (actuals) ²	8	10	11	25
Total CO2e scope 2 (market-based) ³	9	9	8	49
Total carbon scope 3 ⁴	11	7	9	23

1. The total actual carbon is the sum of scope 1, 2 and 3 actual emissions. The total can deviate from the sum of all categories due to rounding-up to kilotonnes. To date, we only account for carbon dioxide (CO2), methane (CH4) and nitrous oxide (N2O).
2. Scope 1 comprises emissions from our use of natural gas and fuel oil.
3. Scope 2 comprises emissions from our use of non-renewable electricity and district heating.
4. Scope 3 comprises emissions from our business travel by air and car. This includes travel for business purpose only and excludes emissions from employee commuting.
5. Figures for 2021, 2020, and 2014 contain adjustments based on historical restatements.
6. Actuals figures above were derived from data that was collected from 98.2 percent of reporting locations; an estimate was made for the remaining 1.8 percent to inform Total Carbon.

Scope 1				
	2022	2021	2020	2014
Coverage (% of employees)	98	89	98	91
Kilotonne CO2e				
Natural gas	7	10	11	26
Fuel oil	0.2	0.4	0.4	1.6

Scope 2				
	2022	2021	2020	2014
Coverage (% of employees)	98	98	97	91
Kilotonne CO2e				
Electricity ⁷	0.5	0.5	0.1	46.6
District heating	9	9	8	7

7. Electricity emissions now include emissions for countries where unbundled EACs sourced outside of RE100 market boundary criteria.

Scope 3				
	2022	2021	2020	2014
Coverage (% of employees)	97	98	99	90
Kilotonne CO2e				
Travel	12	7	9	25

Renewable Electricity Sourcing				
	2022	2021	2020	2014
Renewable electricity (MWh) ⁷	176	176	195	277
Self-generation	1	-	-	-
Physical PPA	2	-	-	-
Financial/virtual PPA	33	-	-	-
Project-specific supply contract	4	-	-	-
Retail supply contract	114	-	-	-
Unbundled EACs	23	-	-	-

7. In 2022, we further aligned with the reporting guidance of the RE100, a technical group that sets industry standards around corporate use of renewable electricity. Therefore, renewable electricity is categorized into different sourcing types.

Notes on Methodology

- We use the operational control method to delineate our organisational boundary. Currently this includes the primary subsidiaries of ING Bank excluding Intertyp business in Germany. The reporting also excludes Fixed asset investments, franchises, incorporated and non-incorporated joint-ventures and partnerships.
- The scope of reporting for the base year remains 2014. The base year will be recalculated on best effort basis to ensure consistency and relevance of reported data in case of: 1) Structural changes in the organisation, including significant scope changes, changes in calculation methodology, improvement in the accuracy of emission factors or activity data. 2) The discovery of data/calculation errors, that significantly impact the base year emissions data, using a three percent threshold on the last 2 years.
- For natural gas and heating oil, we use emissions factors from DEFRA. For electricity generation, we use emission factors from the International Energy Agency. For district heating we use country specific factors, informed by GaBi, and in the case of Poland by the country office (which provides an average factor of each location and the different district heating factors that apply across the geography).
- For air travel, we gather information on short-haul (<450km), medium-haul (450-1600km), and long-haul (>1600km) distances, and apply emission factors from the DEFRA. We currently apply emission factors for air travel using an average fare-class.
- Emissions from car travel include lease car, private car and available information on taxi travel undertaken for business related activities. As lease cars are also used by employees for private purposes, we assume that 30 percent of all kilometres driven in lease cars are for business purposes. For car travel, we apply bespoke emission factors provided for by the suppliers of lease vehicles and if not provided in some markets, DEFRA emission factors are used. We currently apply emission factors for car travel using an average of car types.
- Sometimes, data may not be complete for all emission categories. In case of incomplete or missing data that falls short of a country's entire scope some figures may be based on assumptions. These assumptions would be based on available actual data, the local context for consumption, the number of FTE's and the size of the local operations.

UNEP FI Principles for Responsible Banking

Principle 1: Alignment



We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

Response: ING is a Netherlands-based global financial institution with a strong European base. Our 57,000+ employees serve around 38 million customers, corporate clients and financial institutions in over 40 countries. In our retail banking business, which includes the business banking segment, we offer (individuals, small to medium-sized business and mid-corporates) a full range of products and services covering payments, savings, insurance, investments and secured and unsecured lending. In wholesale banking, we provide corporate clients and financial institutions with advisory value propositions such as specialized lending, tailored corporate finance, sustainable and sustainability-linked financing, and debt and equity market solutions, as well as payments and cash management and trade and treasury services.

Links and references:

Ing Group 2022 Annual Report → ING at a Glance
 ING.COM → About Us → Profile → ING at a glance

Strategy alignment

Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?

Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

Response

Through ING's approach to sustainability in the areas of climate action and financial health, and through the customers and projects we finance, we contribute to following the

Links and references

ING Group 2022 Annual Report → How we are making the difference

Sustainable Development Goals (SDGs) of the United Nations: decent work and economic growth (goal 8), reduced inequalities (goal 10), responsible consumption and production (goal 12) and climate action (goal 13).

Our climate approach is closely aligned with the climate goals of the Paris Agreement, as well as the objectives of the European Commission's Green Deal. In August 2021, we joined the NetZero Baking Alliance and through our Terra approach, now aim to steer our loan book towards in line with a scenario keeping the rise in global temperatures to 1.5 degrees Celsius rather than well below 2 degrees to achieve net-zero greenhouse gas emissions well before 2050 rather than by 2070. ING endorses the recommendations of the Financial Stability Board's (FSB) Task Force on Climate-Related Financial Disclosures (TCFD). As of 2022 ING has aligned its climate reporting structure with the TCFD format in order to support standardisation and comparability across the financial sector. To see how this is done, refer to our integrated climate report on ING.COM.

ING's ESR policy framework helps us make transparent choices about how, where and with whom we do business. In 2021, we updated the ESR Framework as part of the three-year mandatory comprehensive review cycle. Moreover, to ensure ING meets the requirements and expectations of regulators and society on ESG activities the bank has decided to create a new "ESG Risk Centre of Expertise" in the course of 2022. The team will be responsible for mapping, assessing, and implementing regulation around environment, society, and governance (ESG).

ING ultimately contributes to the SDGs by making choices in financing, what we don't finance, what we do finance, and what we finance under certain conditions. The ESR policy framework guides us on the 'no' and the "certain conditions" part, our sustainability objectives such as the one on climate alignment guide what we do finance (the "redirecting financing flows" from the Paris Agreement, article 2C) and also our Sustainable Finance ambitions feed into this by financing sustainable change.

ING Group 2022 Annual Report → Environmental, social and governance risk
ING.COM → Sustainability → Sustainability direction → Climate action → Integrated climate report
ING.COM → Sustainability → Our Stance
ING.COM → Sustainability → Sustainability direction
ING.COM → Sustainability → Sustainable business → Environmental and social risk management
ING.COM → Sustainability → The world around us → sustainable development goals
ING.COM → Sustainability → The world around us → UN Environment Programme FI
ING.COM → Sustainability → Our own operations → Environmental performance
ING.COM → Sustainability → Sustainable business → Circular Economy
ING.COM → Sustainability → Sustainability Direction → Climate action
ING.COM → Sustainability → Sustainability Direction → Financial health
ING.COM → Sustainability → Our Stance → Human Rights
ING.COM → Sustainability → Sustainable business → Biodiversity
INGWB.com → Strategic Finance and Advisory → Sustainable Finance

Principle 2: Impact and Target Setting



We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly¹ and fulfil the following requirements/elements (a-d)²:

a) Scope: What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

b) Portfolio composition: Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope

- i) by sectors & industries³ for business, corporate and investment banking portfolios (i.e., sector exposure or industry breakdown in %), and/or
- ii) by products & services and by types of customers for consumer and retail banking portfolios.

If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

¹ That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

² Further guidance can be found in the [Interactive Guidance on impact analysis and target setting](#).

³ 'Key sectors' relative to different impact areas, i.e., those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.

c) Context: What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate?⁴ Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

This step aims to put your bank's portfolio impacts into the context of society's needs.

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)⁵? Please disclose.

d) For these (min. two prioritized impact areas): Performance measurement: Has your bank identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank's context.

In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e., qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health & inclusion as your most significant impact areas, please also refer to the applicable indicators in the [Annex](#).

If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this.

The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.

Response

On our main geographies, we disclose those in ING at a glance (our market, p. 6). Our business lines and products are disclosed in the Value Creation Model (p. 7). In the Annual Report 2022. Our portfolio composition is presented in the risk management section (see page 119 of AR 2022), also as per below:

Links and references

ING Group 2022 Annual Report → The world around us (materiality analysis / matrix)
 ING Group 2022 Annual Report → How we create value
 ING Group 2022 Annual Report → Risk Section

⁴ Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

⁵ To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g., through stakeholder engagement and further geographic contextualisation.

Portfolio analysis per business line (*)

Outstandings per line of business (),2,3**

Rating class	Wholesale Banking		Retail Bancaux		Retail Challengers & Growth Markets		Corporate line			Total
	2022	2021	2022	2021	2022	2021	2022	2021	2022	
Investment grade	89,686	81,615	324	331	32,492	27,089	2,529	2,363	125,032	111,398
Non-investment grade	49,333	56,982	7,871	5,863	40,498	41,646	12	15	97,714	104,506
Substandard grade	79,292	72,952	48,471	28,866	61,822	59,060	300	194	188,506	159,943
Non-performing loans	129,709	124,622	117,172	125,469	56,046	57,394	2,833	2,502	305,760	309,906
Total	56,409	61,396	55,945	60,296	46,857	42,554	4	353	159,016	165,199
Industry	13,693	16,499	14,224	14,560	11,662	10,000			39,579	42,099
Private Individuals	1,850	1,712	2,021	2,150	1,014	751	299	170	5,192	4,779
Central Banks	3,564	865	1,504	904	519	477			5,366	2,245
Natural Resources	731	126	962	1,462	490	451			2,183	1,793
Real Estate	4,541	3,937	4,762	5,035	2,592	3,153			11,695	12,124
Commercial Banks	428,616	420,606	250,056	244,232	253,391	243,334	5,997	5,805	938,061	913,977
Non-Bank Financial Institutions										
Central Governments										
Transportation & Logistics										
Utilities										
Food, Beverages & Personal Care										
Services										
General Industries										
Lower Public Administration										
Other										
Total	428,616	420,606	250,056	244,232	253,391	243,334	5,997	5,805	938,061	913,977

Our product scope per business line is presented at page 9 (within the VCM) of AR 2022:

Our products

<p>Retail Banking</p> <ul style="list-style-type: none"> ▪ Mortgages ▪ Savings ▪ Business and consumer lending ▪ Investments ▪ Payments 	<p>Wholesale Banking</p> <ul style="list-style-type: none"> ▪ Lending ▪ Sustainable finance solutions ▪ Tailored Corporate finance solutions ▪ Debt and equity markets solutions ▪ Payments and cash management ▪ Trade and treasury services
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To determine our positive and negative impact analysis (the impact assessment), we the new GRI 3-3 criteria to our materiality analysis 2022. Please find our GRI mapping table on how we applied the 3-3 criteria in our materiality analysis, analysing our positive and negative impacts per each material topic, in our technical appendix (appendix to the Annual Report 2022). The scope of our materiality analysis was on the entire ING group. More info on process and results can be found on page 14 – 16 of the AR 2022, or as below:

ING.COM → Sustainability → Sustainability direction → Climate action → Integrated climate report

ING.COM → Sustainability → The world around us → sustainable development goals

ING.COM → Sustainability → Sustainability direction

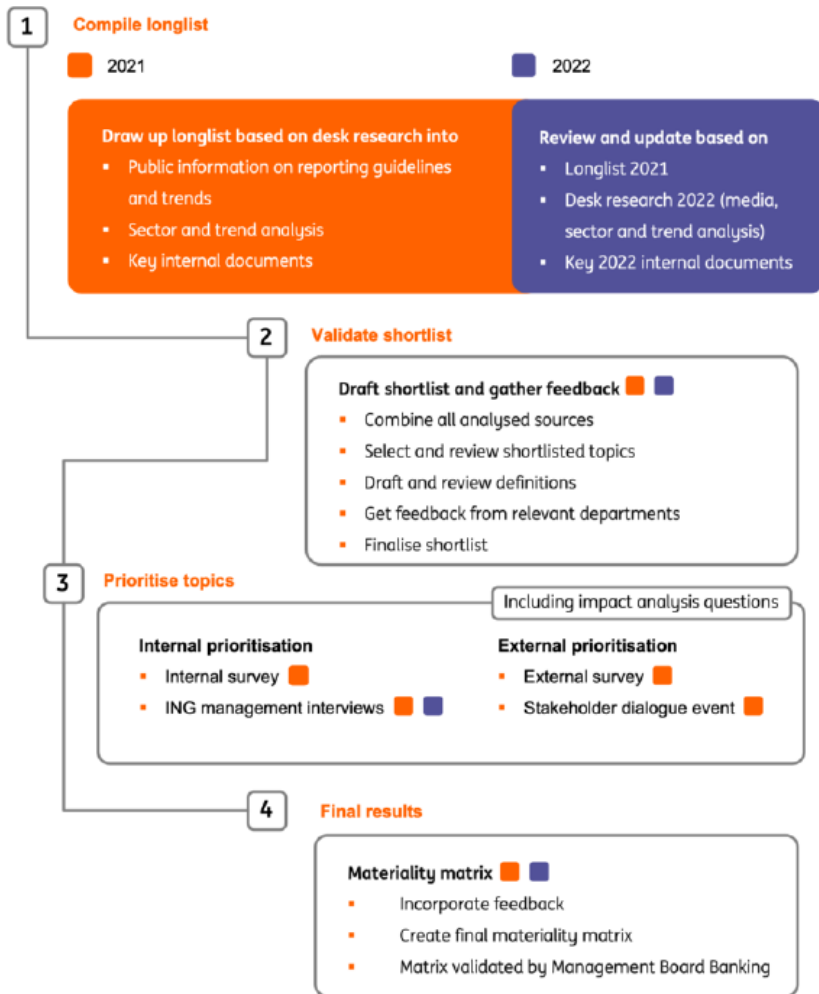
ING.COM → Sustainability → Sustainability Direction → Sustainable business- → Terra approach

ING.COM → Sustainability → Sustainability Direction → Sustainable Business → Human rights review

2021/2022 ING.COM → Sustainability → Sustainability Direction → Sustainable business → Financial health

Technical appendix (to AR) on GRI/SASB mapping table

Materiality analysis process



Each year, ING Group N.V. (hereafter ING) performs a materiality assessment, gathering input from customers, investors, NGOs, and other external stakeholders. The outcomes of the materiality assessment are used as input for the Integrated Annual Report (IAR). ING follows a

three-year cycle, with an extensive materiality analysis every 3 years and 'light' updates in-between. As per the cycle, the last extensive materiality assessment ING has performed was in 2021 to get detailed insight on the topics that are most relevant to internal and external stakeholders. In 2022, ING conducted a light update of materiality assessment results. ING recalibrated the material topics through light desk research and conducted a desktop-based update, using external and internal inputs in line with last year's process. Additional internal insights were gathered through internal interviews (6 interviews). The results have been discussed with the steering group during a working session.

This assessment has been done according to the GRI 2021 standards. Furthermore, the concept of 'impact' has a specific focus, which will be obligatory under the new EU Corporate Sustainability Reporting Directive (CSRD) from 2023 onwards. We already applied this concept of 'impact' in our 2022 materiality analysis, to be prepared for CSRD. This approach on the concept of 'impact' also bridges to what UNEP FI PRB requires by doing an 'impact analysis'.

We identified 3 significant impact areas, partly based on our materiality analysis (there was no specific process followed to determine the significant impact area's) which also work as base to this UNEP FI PRB reporting, which are: 1) climate change, 2) human rights and 3) financial health & inclusion.

We apply strict social, ethical and environmental criteria in our financing and investment policies. Every client and transaction are assessed, monitored and evaluated against the requirements of our environmental and social risk (ESR) framework. This is not part of our impact analysis but focuses on how we screen our clients and transactions according to ESG criteria.

In 2022 we have continued to develop a tool for measuring progress on human rights commitments within our portfolio. In 2021, we received feedback on the methodology test from our different business lines, showing that we needed to add information on a sector level. Since then, we have made several improvements to the tool including an update of the data points and improving data matching between the three databases and ING's client portfolio. A new survey was carried out among client relationship managers to raise more awareness regarding the tool and identify how it could be further improved. The latest survey identified issues that client relationship managers face as part of their day-to-day activities, such as lack

of access to ESG data and ESG ratings and the fact that ESG and client data is often scattered across multiple systems. In response to these findings, we created a human rights dashboard, consolidating external and internal data in one place, combining third-party ESG client ratings, internal (ING) ESG client ratings, and our lending exposure to the client. ING Analytics is currently researching ways to implement this tool as part of ING's existing processes, and also analysing how to add Environmental and Governance topics to the model. We are currently looking at further completing our human rights performance measurement, also in anticipation to our 2023 Human rights report.

In 2022 we continued to enhance the tools used to identify and assess climate and environmental risks in our portfolio. We created extensive climate and environmental (C&E) risk heatmaps for both Wholesale Banking and Retail Banking. This to demonstrate our performance vis-à-vis climate risk identification and mitigation (part of how we tackle climate change).

Our Terra approach (which is ING's strategy on climate alignment) is how we aim to steer the most carbon intensive parts of our loan book towards net-zero by 2050. These are power generation, fossil fuels, automotive, shipping, aviation, steel, cement, residential mortgages and commercial real estate. To measure progress, Terra uses the most appropriate methodology available per sector, given that each has its own transition pathway.

While ING's Terra approach makes use of various methodologies, there is one that applies to most of the sectors in scope. This is the methodology ING co-created with the 2° Investing Initiative (2DII), a global think tank developing climate metrics in financial markets.

It's called PACTA for Banks. It looks at the technology shift that's needed across certain sectors to slow global warming and then measures this against the actual technology clients are using – or plan on using in the future.

Next to this, there are limitations, assumptions and estimations regarding our climate alignment strategy (Terra) which are further disclose in the Climate Report.

Detailed technology roadmaps for each sector are being developed by independent

organisations like the International Energy Agency. These are used as benchmarks. We then compare the data from the sector roadmaps to the data on the technology our clients are using today and planning on using in the future.

This client data comes from global databases that track public and private companies of various sizes around the world. This makes it easy for clients, as they aren't required to provide any data themselves.

In the automotive sector, for example, we measure the current mix of our clients' production of internal combustion engine vehicles compared to zero-emission vehicles and how clients plan to shift this balance over time. We can then compare this with what science-based transition pathways prescribe for the automotive sector in order to reach the net-zero by 2050 goal. The analysis doesn't only tell us what needs to shift, but also how much and by when. This is where financing comes in – and where ING can have an impact.

For our progress on Financial Health and specifically on Scope (2.1a) and Performance Measurement (2.1d), please refer to the pdf “ING's financial health approach – supplementary materials, 9 March 2023” published on ing.com.

With regards to impact analysis, Human Rights and Financial Health has been described in accordance with UNEP FI PRB criteria, but those are not yet final and will be further described in our coming 2023 topic specific disclosures.

Last, but not least; our impact on (UN) sustainable development. This in light of our global impact we have on sustainable development, and not considering the national context. As a large bank serving customers in over 40 countries, we contribute directly and indirectly to virtually all SDGs through the clients and projects we finance. We choose to focus on the SDGs that we can impact the most, using our business strategy and purpose to guide us. Through our approach to sustainability in the areas of climate action, financial health and human rights, and through the customers and projects we finance, we mainly contribute to the following SDGs: decent work and economic growth (SDG 8), reduced inequalities (SDG 10), responsible consumption and production (SDG 12) and climate action (SDG 13). In doing so, we work

with other financial institutions, multinational enterprises and industry organisations to advance our understanding of the SDGs and capture impact opportunities.

Self-assessment summary:

Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?⁶

- | | | | |
|--------------------------|---|---|-----------------------------|
| Scope: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Portfolio composition: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Context: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Performance measurement: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> In progress | <input type="checkbox"/> No |

Which most significant impact areas have you identified for your bank, as a result of the impact analysis?

1. *Climate change mitigation & climate change adaptation*
2. *Human rights*
3. *Financial health & inclusion*

How recent is the data used for and disclosed in the impact analysis?

- Up to 6 months prior to publication
- Up to 12 months prior to publication
- Up to 18 months prior to publication
- Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: *(optional)*

⁶ You can respond “Yes” to a question if you have completed one of the described steps, e.g., the initial impact analysis has been carried out, a pilot has been conducted.

2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets⁷ have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

a) Alignment: which international, regional or national policy frameworks to align your bank's portfolio with⁸ have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.
You can build upon the context items under 2.1.

b) Baseline: Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the [Annex](#) of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
<i>Climate change mitigation</i>	...	
	...	
	...	

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
<i>Financial health & inclusion</i>	...	
	...	
	...	

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

c) SMART targets (incl. key performance indicators (KPIs)⁹): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.

d) Action plan: which actions including milestones have you defined to meet the set targets? Please describe.

Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.

Response

To promote immediate action towards decarbonisation and to adhere with our Net-Zero Banking Alliance commitment, in 2022 we set intermediate 2030 targets for all Terra sectors. With the Terra approach, ING currently measures the emissions associated with the clients active in the most carbon-intensive sectors and uses this information to benchmark its clients' activities against the relevant decarbonisation scenarios. Of the nine intermediate targets, eight are aligned with net-zero scenarios. A target for shipping will be set as soon as one is adopted under the Poseidon Principles, a financial industry framework for assessing climate alignment for the shipping sector. When it comes to our KPIs, baseline (years) and SMART

Links and references

ING Group 2022 Annual Report → Sustainability at the heart
ING Group 2022 Annual Report → How we are making the difference
ING.COM → Sustainability → Sustainability direction → Climate action → Integrated climate report
ING.COM → Sustainability → Sustainability Direction → Sustainable business → Financial health

⁷ Operational targets (relating to for example water consumption in office buildings, gender equality on the bank's management board or business-trip related greenhouse gas emissions) are not in scope of the PRB.

⁸ Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank's targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals.

⁹ Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.

targets for our Terra approach, please refer to our 2022 Climate Report, p. 19 (approach), p. 23 (steering our portfolio), p. 44 (metrics and targets) and p. 47 (Terra – steering our portfolio).

On ‘Climate Change’ our targets are communicated in our 2022 Climate Report, as below:

Our strategy to steer our loan book to reach net zero by 2050 or sooner is operationalised through our Terra approach. We have refined and optimised aspects of our approach through, for instance, joining and leading working groups on steel and aluminium with the aim to develop sector-specific methodologies that can be used to measure and steer financial institutions’ portfolios. Regarding our climate alignment, we are on track with five of our nine Terra sectors, with power generation (-23%) and upstream oil and gas (-15.2%) showing strong performance. Commercial real estate (-9.2%), automotive (-0.8%), and shipping (-6.0%) are all also on track for their respective climate alignment pathways.

Residential real estate (3.2%) and cement (4.2%) are within 5% of their alignment pathway, while steel (5.4%) and aviation (57.3%) are not on track. The latter’s performance continues to be affected by the impacts of the coronavirus pandemic, although it is beginning to trend back to its decarbonisation pathway as the sector recovers.

To promote immediate action towards decarbonisation and to adhere with our Net-Zero Banking Alliance (NZBA) commitment, we set intermediate 2030 targets for all of these Terra sectors. Of the nine intermediate targets, eight are aligned with net-zero scenarios. A target for shipping will be set as soon as one is adopted under the Poseidon Principles, a financial industry framework for assessing climate alignment for the shipping sector.

In sum up, in March 2022, we announced that we will restrict dedicated upstream finance (lending or capital markets) for oil and gas fields approved for development after 31 December 2021. While increasing our investments in renewables, we will gradually reduce funding to upstream oil and gas by 12% by 2025 and 19% by 2030 from a baseline year of 2019.

We are aware that in terms of setting our climate alignment baselines years, there is a misalignment with the UNEP FI PRB criteria: the baseline years have been set more than 2 years prior to the target-setting. In some cases, such as with the targets set on our own operations (environmental programme), this has also been impacted due to the circumstances in past

Covid years. For our progress on Financial Health and specifically on Baseline (2.2b) and SMART targets (2.2c), please refer to the pdf “ING’s financial health approach – supplementary materials, 9 March 2023” published on ing.com. The impact areas on financial health and human rights are still in progress, also in terms of target setting, and more development on these will take place in 2023 and going forward. Targets on Human Rights are being developed and currently in progress. Further updating on this will also be covered in coming Human rights report.

Self-assessment summary

Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your...

	... first area of most significant impact: Climate Change	... second area of most significant impact: Financial Health & inclusion	Human Rights
Alignment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
Baseline	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
SMART targets	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
Action plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No

2.3 Target implementation and monitoring (Key Step 2)

For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only): describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

Response

We will continue to monitor and report our progress towards aligning our portfolio with our updated climate commitment of 1.5 degrees or net zero in 2050 (following the NZBA). To measure our progress, Terra uses the most appropriate methodology available per sector, given that each has its own transition pathway, and that some sectors are further along on their journeys. In terms of action plans, as these remain in progress, the implementation and monitoring updates are outside the scope of PRB and will be further detailed/contextualized in our coming 2023 Climate Report.

And, to align our energy portfolio with the International Energy Agency's (IEA) Net-Zero by 2050 Roadmap, we aim to grow new financing of renewable energy by 50% by year-end 2025 versus year-end 2021. ING does not provide dedicated upstream finance (lending or capital markets) for new oil and gas fields approved for development after 31 December 2021.

Out of scope on 2.3. but relevant to our strategy on how we (mitigate) climate change and human rights; is our approach to climate and environmental risk, where there have been several developments. Firstly, our climate risk heatmapping assessment for Wholesale Banking is now complete and covers all Wholesale Banking sectors. These heatmaps categorise physical and transition risk drivers per sector based on a score of low, medium, or high. Another development was to expand the scope and granularity of our pilot project assessing physical

Links and references

ING Group 2022 Annual Report → How we are making the difference

ING.COM → Sustainability → Sustainability direction → Climate action → Integrated climate report

ING.COM → Sustainability → Sustainability Direction → Sustainable business → Financial health

ING.COM →

Sustainability →

Financial Health →

"ING's Financial Health Approach"

climate risk within our mortgage portfolio to cover 99% of our residential mortgages book. This assessment found that at an aggregated level¹, ING's global mortgage portfolio is in the very low risk category (12/100) and <1% of our global mortgages outstanding score as high risk. Finally, we targeted the integration of biodiversity into our sustainable finance frameworks and strengthened biodiversity considerations into risk assessments. ING's process for identifying, assessing, and managing climate risks continues to develop. For example, we have updated our credit risk rating policy to include specific requirements for climate-related and environmental risks. This included the introduction of a mechanism to limit the growth of subsectors that have a higher exposure to climate-related and environmental risks, which became binding for Wholesale Banking sectors this year.

For our progress specifically on Financial Health and specifically our journey towards Target implementation and monitoring (2.3), please refer to the pdf "ING's financial health approach – supplementary materials, 9 March 2023" published on ing.com. There is progress here, but we cannot fully demonstrate our target implementation yet as the target setting is currently still in progress.

Principle 3: Clients and Customers



We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers¹⁰ in place to encourage sustainable practices?

Yes In progress No

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

Yes In progress No

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities¹¹). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).

Response

Terra is an engagement-driven approach supporting existing clients' transition pathways. ING can engage business clients using the Terra Climate Alignment Dashboards (CAD).

Our ESR policy outlines minimum requirements for new clients and improvement targets for existing clients. In 2022, the ESR Framework was updated to reflect several minor amendments following the last comprehensive review cycle that took place in June 2021. The new release includes among other amendments to the restrictions applied in the tobacco value chain, additional clarity on some of the requirements for the ESR client assessment process concerning specific group of companies as well as the required ESR due diligence for public

Links and references

ING Group 2021 Annual Report → Our strategy

ING Group 2021 Annual Report → Sustainability at the heart

ING Group 2021 Annual Report → How we make the difference

ING.COM → Sustainability → Sustainability direction → Climate action → Integrated climate report ING.COM → Sustainability → Sustainable business → Environmental and social risk policies

authority entities. Next to restrictions, the ESR policy also sets guiding principles for biodiversity and human rights.

When it comes to financial health, we're embedding our activities directly into our core business where we can make a more tangible *impact* on our customers. To do this we have built a financial health framework consisting of three pillars. For each pillar best practices are shared between business units with the goal of learning from each other. We're also bringing our community support closer to home through our new community investment programme.

ING.COM → Sustainability → Sustainability Direction → Financial health

3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g., green mortgages – climate, social bonds – financial inclusion, etc.).

Response

ING engages Wholesale Banking clients in sectors with material impacts on the environment and society. An overview of these sectors is available in our ESR framework.

ING maintains a Wholesale Banking engagement platform on sustainable finance.

We think we can make our biggest impact on improving financial health in three ways: through financial inclusion; by helping people manage their everyday finances; and helping them plan for the future and protect their dreams.

Links and references

ING Group 2021 Annual Report → Our business
 ING.COM → Sustainability → Sustainable business → Environmental and social risk policies
 ING.COM → Sustainability → Sustainability Direction → Financial health

¹⁰ A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

¹¹ Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

Principle 4: Stakeholders



We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups¹²) you have identified as relevant in relation to the impact analysis and target setting process?

Yes In progress No

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

Response

We contribute to international initiatives such as various work tracks within the United Nations Environment Programme Finance Initiative (UNEP FI), the Net-Zero Banking Alliance, the Science-Based Targets Initiative and the UN Secretary-General's Special Advocate for Inclusive Finance for Development (UNSGSA). ING is a member of platforms such as the Equator Principles Association and we seek external alignment and validation of our sustainability priorities by endorsing international frameworks such as the UN Global Compact and applying standards such as the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. An overview of partnerships, memberships and endorsements is available at ing.com

Links and references

ING.COM → Sustainability → The world around us → How we engage; • ING.COM → Sustainability → The world around us → Memberships; • ING.COM → Sustainability → The world around us → UN Environment Programme FI

¹² Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations

Principle 5: Governance & Culture



We will implement our commitment to these Principles through effective governance and a culture of responsible banking.

5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?

Yes In progress No

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

In March 2022, we updated our ESG governance approach, integrating and aligning ESG governance with existing business-as-usual governance of the bank. This allows us to steer holistically across ESG on themes like climate, biodiversity, human rights and financial health. As a result, ESG is now a regular topic on the MBB agenda. Our global head of Sustainability reports directly to ING's CEO. For our most significant impact areas, climate alignment (Terra and Climate Risk), Human Rights and Financial Health, we have broader governance established (see Climate report, Human rights review report and Financial Health update on [ing.com](https://www.ing.com)), but not fully in accordance with the criteria on that as established by the PRB (impact metrics and target setting). This is due to the fact that next to UNEP FI PRB, our governance is also built on other commitment requirements such as NZBA. Currently, we do not have a specific governance dedicated to UNEP FI PRB.

Links and references

ING Group 2022 Annual Report → Sustainability at the Heart

ING.COM → Sustainability → Sustainability Direction → Sustainability governance

<p>Sustainability/ESG leads in major countries have a functional line to the global head of Sustainability to create a stronger connection between global and local actions.</p> <p>The ESG Committee, set up in 2022, assists the SB with matters relating to ESG, including but not limited to, the development and integration of ESG across the company and its strategy. The ESG Committee also assists the SB by monitoring and advising on relevant ESG developments. In addition, we have created an ESG Sounding Board comprised of senior leaders from across the organisation and including representatives from Legal, Investor Relations and Corporate Strategy. The Sounding Board helps guiding the development and implementation of our strategy for ESG topics as well as monitoring and reporting on our progress.</p> <p>We follow the recommendations of the Taskforce for Climate-related Financial Disclosure in our governance and reporting. We believe this new approach increases our effectiveness, efficiency and accountability as we strive to be a banking leader in building a sustainable future for customers, our company, society, and the environment.</p>	
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5.2 Promoting a culture of responsible banking:

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

Response

ING's ESG performance determines part of the Executive Team's variable compensation. The ESR team provides training (both in-person and via webinars) to hundreds of colleagues around the world every year in risk, front office, KYC and compliance teams, so that ESR knowledge is built on and spread. Moreover, all employees are encouraged to contribute to sustainable impact through sustainability-focused training which are available on ING's learning platform (MyLearning). ING also encourages colleagues to follow the "sustainability boost", which is a three-day learning programme to activate employees to contribute to our sustainability objectives. In addition, employees are motivated to include a sustainability

Links and references

ING Group 2022 Annual Report → Environmental, social and governance risk
 ING Group 2022 Annual Report → How we are making the difference
 ING.COM → About us → Corporate Governance → Remuneration → Executive Board remuneration (policy) ing.com → Investor relations → Presentations → ESG presentation 2022

objective in their year plan as a stretch ambition if they don't contribute already to this in their role.	
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5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio?¹³ Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

<p><i>Response</i></p> <p>Oversight of the Principles for Responsible Banking implementation has been integrated into our sustainability governance, meaning that it is now a board-level mandate. ING has signed commitment of the Net-Zero Banking Alliance whose implementation is ultimately covered by the same governance structure; In 2022 our governance structure was updated to integrate and align our ESG governance with the existing business-as-usual governance of the bank. This new governance setup allows us to steer holistically across ESG themes like climate, biodiversity, human rights, and financial health.</p>	<p><i>Links and references</i></p> <p>ING.COM → Sustainability → Sustainability Direction → Sustainability governance</p>
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Self-assessment summary

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?

Yes No

Does the governance system entail structures to oversee PRB implementation (e.g., incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?

Yes No

Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

Yes In progress No

¹³ Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.

Principle 6: Transparency & Accountability



We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

Yes Partially No

If applicable, please include the link or description of the assurance statement.

Response

Links and references

Assurance statement by KPMG in the Annual report 2022

6.2 Reporting on other frameworks

Does your bank disclose sustainability information in any of the listed below standards and frameworks?

- GRI
- SASB
- CDP
- IFRS Sustainability Disclosure Standards (to be published)
- TCFD
- Other:

<i>Response</i>	<i>Links and references</i>
6.3 Outlook What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis ¹⁴ , target setting ¹⁵ and governance structure for implementing the PRB)? Please describe briefly.	
<i>Response</i>	<i>Links and references</i>
In 2023, we intend to conduct an extensive materiality assessment, including an impact analysis, based on the new GRI reporting standards plus the UNEP FI PRB requirements on impact assessment.	

6.4 Challenges

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).

If desired, you can elaborate on challenges and how you are tackling these:

- Embedding PRB oversight into governance
- Customer engagement
- Gaining or maintaining momentum in the bank
- Stakeholder engagement
- Data availability
- Getting started: where to start and what to focus on in the beginning
- Data quality

¹⁴ For example, outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context, and performance measurement

¹⁵ For example, outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.

- Conducting an impact analysis
- Assessing negative environmental and social impacts
- Choosing the right performance measurement methodology/ies
- Setting targets
- Other: ...
- Access to resources
- Reporting
- Assurance
- Prioritizing actions internally

If desired, you can elaborate on challenges and how you are tackling these:

**ERM CVS
Assurance Statement
for ING 2022 UNEP FI**

(SIGNED 09 MARCH 2023)

Independent Limited Assurance Statement to ING Groep N.V.

ERM Certification and Verification Services Limited ("ERM CVS") was engaged by ING Groep N.V. ("ING") to provide limited assurance in relation to the selected information set out below and presented in ING's United Nations Environment Programme Finance Initiative ("UNEP FI") Principles for Responsible Banking ("PRB") Reporting and Self-Assessment Template (the "Report") as published within the Technical Appendix to ING's 2022 Annual Report.

Engagement summary	
Scope of our assurance engagement	<p>Whether the selected 2022 information is fairly presented in the Report and aligned, in all material respects, with the criteria.</p> <ul style="list-style-type: none"> • Principle 2.1: Impact Analysis • Principle 2.2: Target Setting • Principle 2.3: Target Implementation and Monitoring • Principle 5.1: Governance Structure for Implementation of the Principles <p>Our assurance engagement only relates to the summary of ING's activities included in the Report and does not extend to external disclosures by ING that have been provided as references in the Report. Our assurance engagement does not extend to information in respect of earlier periods or to any other information included in the Report.</p>
Reporting period	2022 (1st January 2022 to 31st December 2022)
Reporting criteria	<p>Principles for Responsible Banking Reporting and Self-Assessment Template Reviewed version (V2) from September 2022, UNEP FI</p> <p>Principles for Responsible Banking, Guidance for assurance providers: Providing Limited Assurance for Reporting, Version 2 (updated in October 2022), UNEP FI</p> <p>NZBA Intermediate Target Disclosure Checklist, June 2022, UNEP FI</p>
Assurance standard and level of assurance	<p>We performed a limited assurance engagement, in accordance with the International Standard on Assurance Engagements ISAE 3000 (Revised) 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' issued by the International Auditing and Standards Board.</p> <p>The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement and consequently, 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.</p>
Respective responsibilities	<p>ING is responsible for preparing the Report and for the collection and presentation of the information within it.</p> <p>ERM CVS' responsibility is to provide conclusions to ING on the agreed scope based on our engagement terms with ING, the assurance activities performed and exercising our professional judgement. We accept no responsibility, and deny any liability, to any party other than ING for the conclusions we have reached.</p>

Our qualified conclusion

In our opinion, except for the matter described in the "Basis for qualified conclusion" paragraph below, nothing has come to our attention to indicate that the 2022 information for the disclosures listed under 'Scope' above is not fairly presented in the Report, in all material respects, in accordance with the reporting criteria.

Basis for qualified conclusion

ING has disclosed, in section 2.1 of the Report, that it lacks a formal process for determining the significant impact areas for setting targets. This is not accordance with the requirements of the reporting criteria.

Emphases of matter

We draw attention to:

- the description of baseline years set for targets in section 2.2 of the Report; and
- the lack of specific governance covering PRB self-assessment and reporting, as disclosed by ING in section 5.1 of the Report.

This information should be taken into account by users of the Report, but does not affect our conclusion.

Our assurance activities

Considering the level of assurance and our assessment of the risk of material misstatement, a multi-disciplinary team of sustainability and assurance specialists performed a range of procedures that included, but was not restricted to, the following:

- Discussing with ING's key information holders the internal policies, reporting process and data regarding the preparation and disclosure of their UN PRB self-assessment.
- Reviewing a sample of qualitative and quantitative documentation to confirm information has been reported in alignment with the reporting criteria.
- Reviewing agreement between claims made within the selected information to other disclosures subject to separate third-party assurance.
- Reviewing the presentation of information relevant to the scope of our work in the Report to ensure consistency with our findings.

The limitations of our engagement

The reliability of the assured information is subject to inherent uncertainties, given the available methods for determining, calculating or estimating the underlying information. It is important to understand our assurance conclusions in this context.

We have not independently reviewed or verified the following:

- The accuracy of ING's baseline or current year performance for KPIs disclosed or referenced in the Report. We did not review any samples of documentary evidence supporting the underlying data.
- The accuracy of information presented in the Report outside the scope of the reporting criteria. Information outside the scope of the reporting criteria includes, but is not limited to, ING's climate risk heatmapping assessment and ING's ESR framework.
- The accuracy of financial data regarding ING's portfolio composition. Our work in this regard was limited to confirming agreement between the data included in the Report and ING's 2022 Annual Report which we understand is professionally audited by a financial accountant.

Our independence, integrity and quality control

ERM CVS is an independent certification and verification body accredited by UKAS to ISO 17021:2015. Accordingly we 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. Our quality management system is at least as demanding as the relevant sections of ISQM-1 and ISQM-2 (2022).

ERM CVS applies a Code of Conduct and related policies to ensure that its employees maintain integrity, objectivity, professional competence and high ethical standards in their work. Our processes are designed and implemented to ensure that the work we undertake is objective, impartial and free from bias and conflict of interest. Our certified management system covers independence and ethical requirements that are at least as demanding as the relevant sections of Parts A & B of the IESBA Code relating to assurance engagements.

The team that has undertaken this assurance engagement has extensive experience in conducting assurance on environmental, social, ethical and health and safety information, systems and processes, and provides no consultancy related services to ING in any respect.

Our observations

We have provided ING with a separate Management Report with our detailed findings and recommendations. Without affecting the conclusion presented above, we make the following observations:

- ING's Climate Change targets, as disclosed or referenced in section 2.2 of the Report, are set in relation to baseline years that are up to over 2 years separated from the year in which the targets have been set. The reporting criteria only allows for a separation of up to 2 years.
- As described in section 5.1 of the Report, ING lacks a clear governance structure for impact analysis, target setting and monitoring. ERM CVS could not confirm that ING's senior management has a clear view of the same.
- ING has not disclosed when it will obtain assurance over the performance measurement metrics referred to in section 2.1 of the Report.
- ING's target in relation to renewable energy, as disclosed in section 2.2 of the Report, is not sufficiently detailed to be considered a SMART target.



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09 March 2023

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