

Responsible Banking Progress Statement – ING 2025

This Progress Statement has been prepared following the guidance provided by the [Principles for Responsible Banking \(PRB\)](#)

Principle 1: Alignment

Our ‘Growing the difference’ strategy is focused on delivering superior value to our customers and putting sustainability at the heart of what we do. (1)

Our sustainability strategy spans climate, nature and social agendas, recognising their interdependencies and how they affect each other, both positively and negatively, and taking into account the legal and regulatory frameworks in the jurisdictions in which we operate. Each of these is a complex and dynamic matter, so our response needs to be dynamic as well. As scientific understanding is continually advancing, our approach will also keep evolving. Therefore, our climate action has evolved to encompass both mitigation and a growing emphasis on adaptation. Increasingly, we are also exploring how we can play a role in halting and reversing nature degradation and regenerating natural systems, while respecting human rights and

Principle 2: Impact & Target Setting

In 2025, ING Group conducted a Double Materiality Assessment (DMA) in line with the European Sustainability Reporting Standards (ESRS) and supported by the EFRAG implementation guidance. Climate change and Biodiversity & ecosystems both continue to be priority areas under PRB, as they continue to be among the material topics identified as per our 2025 DMA. (1) ING continues to work on financial health & inclusion and human rights; more information on these topics can be found on [ING.com](#) (see direct links also below.)

In pursuit of our climate change mitigation and adaptation actions, we have disclosed ING’s transition plan per ESRS E1 in the 2025 ING Group Sustainability statement. We have also disclosed the policies and actions taken to manage our impacts, risks and opportunities. (2)

As a financial institution, we have an important role to play in helping our clients reduce their pressures on nature. To address the growing environmental urgency on topics such as biodiversity, pollution and water, we have developed transition actions that guide our

Principle 3: Clients & Customers

ING continues to embed ESG risk into our risk management process, and support our clients in their transition. For Wholesale Banking (WB), ING has developed an ESG risk-assessment approach which considers the (climate and) environmental, social and governance risk factors, negative impacts and dependencies of our WB customers, and fully integrates the previous ESR framework, which is now embedded under the umbrella of the new ESG Risk Framework. Tooling was developed to support the implementation of the assessment approach in the credit granting process. (1)

To support our WB clients in their sustainable transition, we tailor our offerings across lending, debt and capital advisory, transaction services, and financial markets to meet individual needs and sustainability goals. This approach enables us to accelerate sustainable business practices, including the energy transition.

We concluded our volumes mobilised metric as a material opportunity. This metric mobilises our organisation to advise sustainable products and contributes to our clients’ transition to more sustainable business models. In 2025 we recorded €166 billion of volumes mobilised (2024: €130 billion). (2) Our Transition Accelerator incubates and fosters cross-sector collaboration to scale systemic solutions. (3) (5)

Our client engagement approach is inclusive, so we work closely with clients to understand their strategic direction and support practical steps towards the mitigation of transition risk. This includes tailored products, sustainable financing opportunities, and constructive discussions on sector pathways.

This approach is supported by our Client Transition Plan (CTP). Since 2023 we have been collecting publicly disclosed data on the climate disclosures and transition plans of our WB clients. We assess how our clients approach sustainability and we continue to gather this information. Since 2024 ING has used these assessments to guide fact-based conversations with clients. They help us identify financing needs and potential transition risks.

working to advance financial health and inclusion for customers and communities. (1)

References and other relevant links:

- (1) [ING Group Annual Report 2025](#), Our strategy, p. 14.
- [ING.com: Strategy](#)
- [ING.com: ING at a glance](#)
- [ING.com: Sustainable development goals](#)
- [ING.com: Sustainability approach](#)
- [ING.com: Our climate approach](#)
- [ING.com: Nature](#)
- [ING.com: Human rights](#)
- [ING.com: ESR \(including ESR framework\)](#)
- [ING Group Annual Report 2025](#), ING at a glance, pp. 7-12; Our strategy; p. 14; How we create value pp. 15-16; Sustainability at the heart, pp. 20-21; and the Environmental, Social and Governance (ESG) Risk Framework, pp. 206 ff.
- [ING Climate Update 2025](#), Our strategic ambition and climate action approach, pp. 6-9.

strategy. This includes gradually incorporating nature into our risk frameworks, client engagement and financing strategies, in line with our broader sustainability ambition. Our nature approach is informed by international frameworks and agreements, including the goals and targets outlined in the Kunming-Montreal Global Biodiversity Framework (GBF). We have disclosed this approach for the material impacts, risks and opportunities, and the related policies under ESRS E4, including our ESG Risk Policy.

We have contributed to the UN PRB Nature Target-Setting Guidance and other work with other external stakeholders to improve knowledge, standards and methodologies for nature-related finance. (3)

References and other relevant links:

- (1) [ING Group Annual Report 2025](#), Double Materiality Assessment, pp. 96-100.
- (2) [ING Group Annual Report 2025](#), 2025 ING Group Sustainability statement, pp. 91-147.
- (2) [ING Group Annual Report 2025](#), 2025 ING Group Sustainability statement, Climate change pp. 104-127.
- (3) [ING Group Annual Report 2025](#), 2025 ING Group Sustainability statement, Biodiversity and ecosystems, pp. 128-129.
- [ING.com: Human rights](#)
- [ING.com: Financial health](#)

Business Banking is now adopting similar practices, using climate data to engage with clients. Relationship managers are being upskilled to facilitate meaningful sustainability discussions. (3)

Business Banking lending presents opportunities to support clients in their transition through sustainable finance products. Loans used to fund low-carbon investments, such as renewable energy or energy efficiency, enable businesses to transition to more sustainable operations. Retail Banking has significant opportunities to support the transition to a low-carbon economy through green mortgages. (4)

In the Netherlands, we scaled up ING Upgrader to simplify home retrofitting and introduced energy-label-linked mortgage rate discounts. In Belgium, we launched a 'Renovation Toolkit' platform that helps customers determine renovation measures, explore financing options, and connect with craftsmen and expert advice. We also published research to support the decarbonisation of residential real estate across Europe. (5)

ING integrates nature-related topics, such as deforestation, into our client engagement and sustainability strategy. With this information, we aim to strengthen ING's environmental risk assessments to support business decisions that benefit species and ecosystems. (6)

References and other relevant links:

- (1) [ING Group Annual Report 2025](#), ESG risk assessment tool, p. 208.
- (2) [ING Group Annual Report 2025](#), 2025 ING Group Sustainability statement, Guidelines and actions addressing our opportunities, Wholesale Banking, p. 108.
- (3) [ING Group Annual Report 2025](#), 2025 ING Group Sustainability statement, Climate change, Client engagement and Sustainable finance to support our clients' transition, p. 109.
- (4) [ING Group Annual Report 2025](#), 2025 ING Group Sustainability statement, Guidelines and actions addressing our opportunities, Retail Banking, p. 108.
- (5) [ING Group Annual Report 2025](#), [2025 ING Group Sustainability statement](#), Our climate ambition, p. 106.
- (6) [ING Group Annual Report 2025](#), 2025 ING Group Sustainability statement, Biodiversity and ecosystems, Client engagement, p. 129.
- [ING Group Annual Report 2025](#), ESG Risk Framework, pp. 206 ff.

Principle 4: Stakeholders

ING continuously assesses the strategic, economic, and environmental impact of our activities to ensure alignment with our long-term business objectives and value creation for stakeholders. An important step in this process is the engagement and dialogue with our many and diverse stakeholders. We maintain ongoing dialogues with our stakeholder groups and individuals who influence, or are affected by, ING's business and discuss our role in society, products and services, business performance, and other key matters. (1)

More information on our stakeholder engagement can be found on ING.com and in our publications.

References and other relevant links:

- (1) [ING Group Annual Report 2025](#), How we create value, p. 15.
- [ING Group Annual Report 2025](#), ING Group 2025 Sustainability statement, Stakeholder engagement, p. 100.
- [ING.com: Sustainability - How we engage](#)
- [ING.com: Sustainability - Stakeholder dialogue](#)
- [Climate Update 2025](#), Partnering for progress, p. 16.

Principle 5: Governance & Culture

At ING, we have integrated sustainability into our existing governance. See page 102 of the 2025 ING Group Annual Report for more details.

The ESG Committee assists the Supervisory Board (SB) with matters relating to the various areas of ESG, including but not limited to, the development of ESG and its integration in the company and its strategy and ESG-related disclosures, reporting and assurance (the latter together with the Audit Committee). In addition, the ESG Committee assists the SB by monitoring and advising on potential impediments as well as relevant trends and developments on 'environmental', 'social' and 'governance' topics and how to connect them with ING's response, actions and targets on the basis of ING's ESG dashboard.

ESG is a regular topic on the agenda of ING's management boards (the EB and the MBB), in their capacity of day-to-day management of the business and as part of their responsibility for ING's long-term (ESG) strategy. ESG-related matters, the related impacts, risks, and opportunities, and their effect on our strategy are intertwined in many other discussions and topics discussed by the EB and the MBB. There are also ESG governance bodies and channels at senior management level and in business lines. (1)

In 2025, we launched ING University, our new global learning platform. This brings learning into one place for all ING employees worldwide. (2) This includes learning on sustainability.

References and other relevant links:

- (1) [ING Group Annual Report 2025](#), ING Group 2025 Sustainability statement, Our sustainability governance, p. 102; and Our leadership and corporate governance (for details about the full function of governance bodies and the composition of ING's Management and Supervisory Board, including their roles, expertise and remuneration), pp. 34 ff.
- (2) [ING Group Annual Report 2025](#), Strategy, business model and value creation, p. 24.

Principle 6: Transparency & Accountability

The 2025 ING Group Sustainability statement is produced in accordance with the European Sustainability Reporting Standards (ESRS) and subject to limited assurance by the external auditor, as specified in the 'about this report section' and the Limited assurance report on the Sustainability statement at pages 343-345 of the 2025 ING Group Annual Report. (1)

We work with external stakeholders to improve knowledge, standards and methodologies. Key contributions include contributing to the UN PRB Nature Target-Setting Guidance and participating in the UNEP FI Finance Leadership Group on Plastics. (2)

See the 2025 ING Group Annual Report and ING.com for more information.

References and other relevant links:

- (1) See Limited assurance report at p. 343-345 of the [ING Group Annual Report 2025](#).
- (2) [ING Group Annual Report 2025](#), 2025 ING Group Sustainability statement, Advancing shared action on nature, p. 129.
- [ING.com: Our sustainability approach](#)

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Please refer to the risk factors, forward looking statements and the full disclaimer in the [Annual Report FY2025](#), which applies in its entirety.