



# Human rights review 2021/2022



Broadening the understanding of our impact

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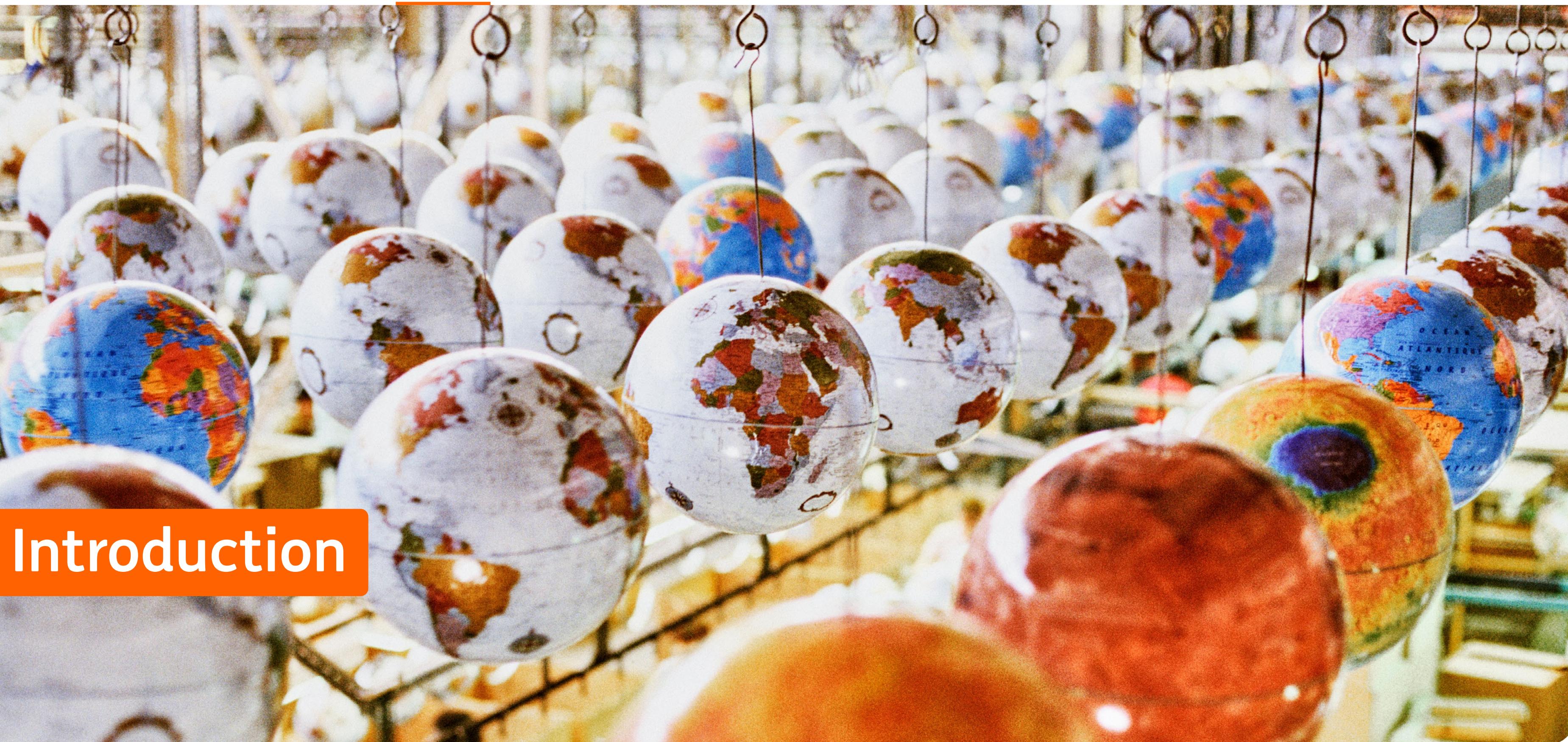
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# ING at a glance

ING is a global bank with a strong European base. Our more than 57,000 employees serve around 38 million customers, corporate clients and financial institutions in over 40 countries. Our purpose is to empower people to stay a step ahead in life and in business.

In our Retail Banking business, which includes the Business Banking segment, we offer individuals, small to medium-sized businesses (SMEs) 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 specialised 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.





# Introduction

# Human rights at ING

Human rights are universal. This means that every person around the world deserves to be treated with dignity, respect and have their rights considered equally. It is not only governments that have the duty to protect individuals against human rights abuses, but businesses are also increasingly recognising their own moral, legal, and corporate responsibility to respect human rights.

While customer centricity guides our business conduct, in our decisions we aim to balance the interests of all stakeholders, while operating within international norms and best practice. The norms and best practice standards that guide our business operations and engagements with clients, customers and suppliers are, [amongst others](#):

- The United Nations (UN) Guiding Principles on Business and Human Rights;
- The Ten Principles of the UN Global Compact;
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (Human Rights chapter);
- The International Finance Corporation (IFC) Performance Standards.

We recognise that ING and its business relationships have the potential to impact human rights through their operations and value chains across sectors and geographies. We could cause, contribute to, or be directly linked to potential or

actual negative human rights impacts. Our ambition in our human rights journey is to understand these impacts and to take appropriate action to avoid or mitigate severe harm and enable remediation if severe harms occur.

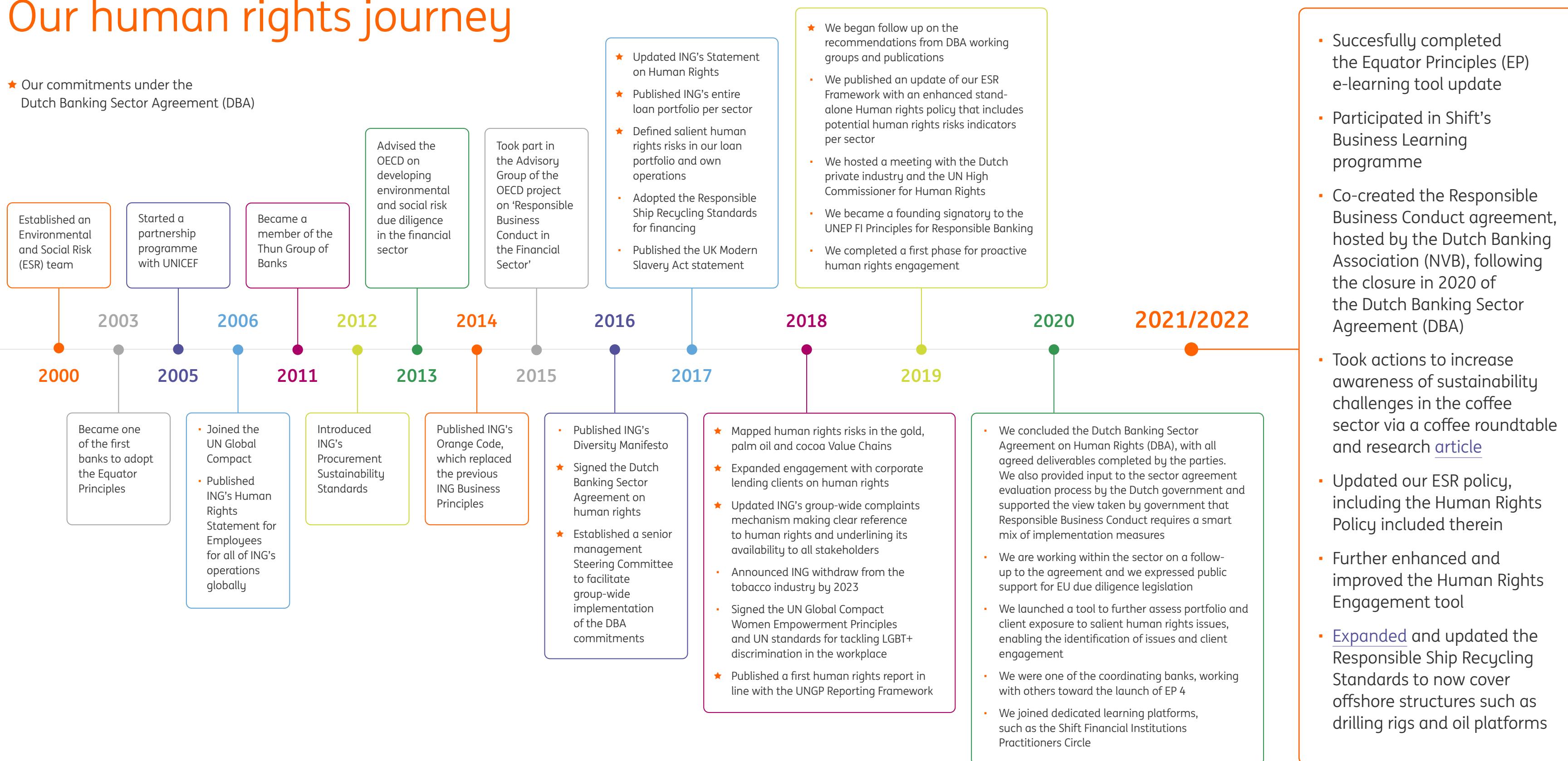
ING's [Statement on Human Rights](#) provides an overview of how we embed human rights in our business conduct. It outlines our responsibility to respect the internationally recognised human rights of all people affected by our activities and business relationships, including our employees, customers, and workers and communities affected by our business partners and their value chains. It refers to our underlying policies and expectations and provides guidance on human rights to our business.

In 2018, we published our first human rights [report](#) outlining our policies, programmes and management of human rights risks and impacts. The report shows how we identified our salient human rights issues in our own operations and lending operations, and how we conduct human rights due diligence. In our [2019 update](#), we highlighted a pilot programme on proactive client engagement; this came about through an exploration of client leverage, salient human rights issues and an ambition to learn and improve. The [2020 update](#) provided insight into the changing external landscape and our response to Covid-19.

**In this review we focus on salient human rights issues for our customers (individuals and households) in our Retail Banking activities as well as providing information on other select topics, such as, our workforce and client engagement tool.**

# Our human rights journey

★ Our commitments under the Dutch Banking Sector Agreement (DBA)



# Resilience to change

The past couple of years have shown that people and organisations need to be resilient. We, like many other organisations, are still dealing with the impact of Covid-19 in our operations. We also recognise the impact of the pandemic on our Retail Banking customers, many of whom suffered severe economic setbacks. Further, we acknowledge that in 2021, as in 2020, our Wholesale Banking clients needed to continue adapting to the changing economic climate. Considering this, our intention is to be resilient and support society by assisting our customers and clients in their recovery from the serious impact the pandemic and the war in Ukraine has had and continues to have on both individuals and the economy.

The war in Ukraine has had an immense impact on the lives of millions of people. We continue to make the safety and wellbeing of ING employees in the region a priority, supporting them and our clients during this challenging situation.

ING strongly [condemns](#) the invasion of Ukraine and we are deeply saddened by its devastating impact on people in the region and the threat it poses to international stability and security. While we continue to support our international clients in Russia and our business in Ukraine is operational, we have decided not to enter into any new business with Russian companies. We are monitoring the situation closely and will review and adapt accordingly.

We recognise that the conflict is affecting people's livelihoods, including those of refugees fleeing the comfort of their homes, often unsure of their final destination. To support Ukrainian refugees in the area of finance, ING has set up special banking services with information available in Ukrainian in locations such as the Netherlands, Poland and Romania. Through a range of global and local initiatives we have raised over €12 million so far for humanitarian aid in Ukraine and for those who have fled to other countries. We have also set up a global fundraising page where employees can make donations, and have waived our fees on the transfer of money from all of our Retail markets to people in Ukraine.



## About this review

In each of our human rights disclosures, our ambition has been to be transparent so that others can learn about our efforts to respect human rights. We also seek collaboration with other parties in tackling the challenges we face. Together, we can clarify priorities and create a stronger presence for stakeholders who may want to discuss human rights topics.

In recognition of the importance of continuing our commitment to report under the UN Guiding Principles Reporting Framework, this review includes our first salient human rights issues assessment in our Retail Banking operations and gives an update on our own operations and client engagement within Wholesale Banking. The review covers the period from the beginning of 2021 to the end of June 2022. During this reporting period, we particularly focus our attention on identifying salient human rights issues in our Retail Banking activities for customers. As this is our first salience exercise in this part of our business, the scope of our customers currently includes private individuals and households who use our Private Banking services, and excludes the small- and medium-sized enterprises and mid-corporates that are considered to be part of our Retail Banking area. In the last section, 'The road ahead', we discuss future disclosures, actions and the steps we need to take to deliver a more comprehensive disclosure on human rights in our next report.



# Retail Banking

Salient human rights issues

As a service provider we offer 36.5 million individual and household customers a full range of products and services covering payments, savings, insurance, investments, and secured and unsecured lending. In the process of serving and engaging with customers, especially the most vulnerable, there is a risk that our clients may experience impacts that affect their human rights as a result of our own actions or our business relationships. As this is our first salience exercise for Retail Banking, we focus our analysis, narrowing the scope to individual customers and households.



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Money is a leading cause of stress for people across the world. External shocks such as high inflation resulting from war and disruption of various supply chains have made matters worse, especially for vulnerable households. However, people's financial situations are usually accompanied by, or caused by, more fundamental components, such as, societal, institutional and behavioural factors.

As a bank we want to make sure that the products and services we offer to our retail customers are suitable and advance their financial health. We also believe that everyone should be served in an inclusive way, so are proactive in ensuring that we provide products and services in a non-discriminatory manner and with appropriate communication.”

– Stefan van Woelderen,  
global lead Financial Health

## Background and methodology

The assessment of ING's retail salient human rights issues complements ING's first salience exercise carried out in 2018 and reported in our first human rights report, and it reflects our commitment to respect human rights across our own operations as well as in our business relationships.

In order to understand how we could impact the human rights of existing and prospective Retail Banking customers, in the first half of 2021 we sent a questionnaire to colleagues in all 12 countries where ING has Retail Banking operations: the Netherlands, Belgium, Luxembourg, Germany, Spain, Poland, Romania, Australia, Italy, Turkey, the Philippines and France<sup>1</sup>.

The questionnaire helped us to identify which human rights issues are salient for ING's retail customers, how these issues are managed, and identify the type of complaint mechanisms we have in place that help make us aware of impacts on retail customers and move to address or remediate them.

The ING colleagues who provided information and completed the questionnaire come from a range of different departments such as Operations, Know Your Customer (KYC), Human Resources, Communications, Public Affairs, Sustainability and Strategy Development. The analysis also included input from external experts in the fields of business and human rights, responsible finance and financial ethics, internal human rights and financial health experts.

This assessment is a first step in the salience exercise, identifying the human rights issues by internal and external experts – some of whom engage directly with customers. As a next step in the process, we will validate these salient issues with customers and additional external stakeholders (including but not limited to consumer organisations and civil society).

In preparing our questionnaire, as well as in our assessment of human rights issues, we considered previous analyses conducted by peer banks into their operations. We used the most common human rights saliences as input for the questionnaire.

Our assessment of the information provided by the involved stakeholders resulted in the identification of three salient human rights issues as a retail service provider:

- a. Discrimination and lack of access to finance for basic needs;
- b. Financial distress that threatens customers' ability to meet their basic needs;
- c. Privacy abuses as a result of compromised integrity of customer data.

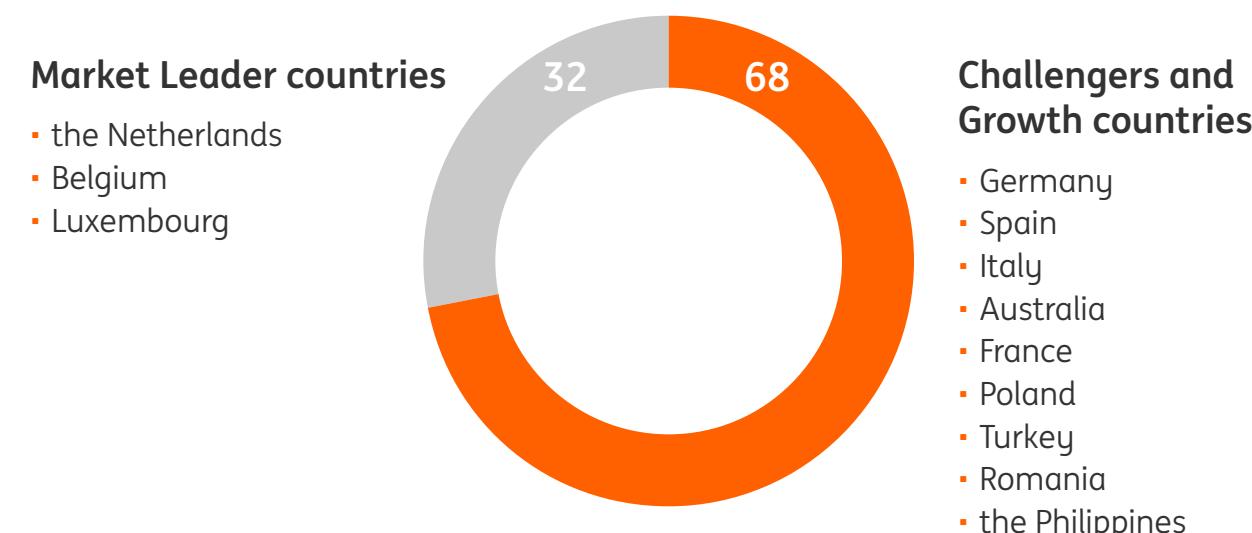
<sup>1</sup> In December 2021 ING announced its exit from the French Retail Banking market with the aim of finalising the exit by the end of 2022. In June 2022 ING announced that it will also leave the Retail Banking market in the Philippines before the end of 2022. For the purposes of this report and considering that the majority of the salience assessment was conducted in 2021, the research carried out in France and the Philippines is included here. However, as we progress with the monitoring and action on our salient human rights issues, only ING's active operations will be taken into account.

The responses, which were both qualitative and quantitative, provided insights into the extent to which countries encountered and recognised these human rights issues for our customers. The feedback obtained confirmed that these are salient issues across all Retail countries. A second round involved follow-up questions being sent to those ING countries with the largest ING customer share, in order to receive clarification and additional insights. The country data is being reviewed for risk assessment and overall due diligence, to enable ING to act on the three specific, salient issues. For the purposes of reporting, this data is aggregated to reflect representative trends and, thus, does not focus on each country individually. Understanding this helps us with **our ultimate goal:**

**To understand, prevent, address and remediate the human rights issues with the most severe potential or actual negative impact for our retail customers resulting from our own activities or those of our business relationships.**

ING offers varying degrees of retail banking services across the countries. Typical accounts and services are: payments, consumer loans, mortgages, savings and investments. The approximate distribution of individual Retail Banking customers in the countries is reflected in Figure 1.

**Figure 1 Approximate distribution of ING Retail Banking customers across country groups, consolidated data December 2021 (in %)**



If a country within any of ING's retail business lines (Market Leaders, Challengers or Growth countries) only represents a small percentage of our total number of retail customers, this does not mean that we disregard it for human rights risk purposes. It remains our responsibility to manage human rights issues in line with the UN Guiding Principles on Business and Human Rights.

<sup>2</sup> In December 2021 ING announced its exit from the French Retail Banking market and in June 2022 its exit from the Retail Banking market in the Philippines with the aim of finalising the exit by the end of 2022. In future reports data from ING France and the Philippines will not be included.



## Discrimination and lack of access to finance for basic needs

Discriminatory practices when providing products or services to our customers may be caused by human bias and/or algorithmic bias. If the way we offer our products and services is not a good fit for a customer's abilities, this could limit access. For example, if we offer only online banking services, this could exclude customers who find it difficult to navigate the online environment, or those whose devices are incompatible with the online services we offer.

In the process of analysing the survey responses we have identified a number of customer characteristics<sup>3</sup> that could be linked to discrimination or to a lack of access to finance for basic needs.

These characteristics include:

- Age;
- Racial and ethnic origin;
- Nationality;
- Language skills;
- Disability;
- Education level;
- Sexual orientation and gender identity;
- Social status;
- Status of residence<sup>4</sup>;
- Digital literacy.

<sup>3</sup> The survey responses of colleagues from Retail countries, particularly their examples and observations, provided insight into customer characteristics that may impact the risk of discrimination and lack of access to finance for basic needs. Further, during survey analysis we looked at discrimination more conceptually and examined the grounds for lack of access to finance for basic needs, causing us to add language skills, education level, social status, and digital literacy to the list of customer characteristics.

<sup>4</sup> People who are not registered to or at an official address.

Discriminatory practices could harm our customers by limiting access to payment and savings accounts, credit and mortgages, by worsening debt situations, making offers less attractive, or worsening the conditions for our products and services because of human or algorithmic bias. These could all reduce our customers' financial health, affecting their ability to provide for their basic needs such as food, housing, and medical care.

The table below lists the causes, consequences and impacts of discrimination when seeking finance for basic needs. We obtained the information from various sources: actual complaints raised by customers via complaints channels; Retail country colleagues who identified potential human rights impacts beyond what was submitted via complaints mechanisms; and internal human rights and financial health experts.

Cause	Actual and potential consequences and impacts for ING's customers
<b>Discrimination on the basis of nationality, racial or ethnic origin, sexual orientation, gender identity</b>	<p>Discriminatory practices when providing products or services to our customers may be caused by human biases and/or algorithmic biases. The existence of this issue within financial institutions was further confirmed by an external expert on financial markets and consumer protection. Potential impacts on the customer are lack of access to payment and savings accounts, credit and mortgages, which may lead to lack of possibilities for better financial health as a precondition to meet basic needs.</p>
<b>Lack of accessibility due to homelessness (no fixed address), or expired or no ID</b>	<p>Half of our Retail countries identified that discrimination on the basis of nationality, race, ethnic origin, sexual orientation or gender identity is either an actual or a potential risk. Four of our Retail countries stated that there were isolated incidents of (alleged) discrimination which they were made aware of via complaints mechanisms; these were addressed.</p> <p>However, we recognise that customers who may be at risk of discrimination on the basis of these characteristics may not be aware of if, or when, they are treated differently, and therefore may not submit a complaint. This could make it more difficult for the bank to track such differences in treatment.</p> <p>We have developed <a href="#">Data Ethics Values</a> which are applied globally in processing of data while keeping in mind local context. Further, when confronted with a dilemma, our employees can always first go through the specifically designed decision making model supporting ethical dilemmas. We are developing guidelines to steer the model development and specifically tackle algorithmic bias, which recently has also been addressed in the EU Artificial Intelligence Act.</p>



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**Accessibility is a key element in pursuing financial inclusion for all. The disability community faces barriers, including limited accessibility of financial services, affecting their equal participation in society. As a bank we are taking the responsibility to address accessibility within our (digital) products and services.**

**We strive to be inclusive and accessible. This takes time and input from our customers with disabilities as they know best where we can improve. This collaboration shows the importance of the philosophy, “Nothing about us without us,” which we aim to uphold with the support of our internal and external stakeholders within the disability community.”**

– Bianca Prins,  
global head of Accessibility, ING

Cause	Actual and potential consequences and impacts for ING's customers
<b>Lack of accessibility when (only) digital services are offered due to age, disability, or lack of digital literacy</b>	People with a disability, certain older people, and people with limited to no digital skills may experience our digital channels as difficult to access, meaning that they do not have equal access to banking services. This may lead to customers feeling the need to leave ING for a bank with a local branch, or to ask for support from third parties, such as family members, friends or caretakers. Further, we recognise that closing branch offices and ATMs may also result in restricted access to our services and products.
	Based on comments in their customer and stakeholder engagements, five of our Retail countries expressed that people with a disability and certain older people are at a greater risk of being unable to access the financial services offered. This risk was also identified by ING's global head of Accessibility as well as the inclusion officer, and representative for disabled persons, from one of our business units.
	It was reported by Retail countries that in some cases, the problem is not a complete lack of access but the fact that credit and other types of products could be more expensive for people with limited access, e.g. through a lack of digital literacy. Customers who are tech savvy are able to access more forms of information allowing them to compare and contrast different offerings, thus, giving them an advantage over customers who are less inclined and able to use digital technology.
	We are taking steps to ensure that our products and services will be equally accessible to all. For instance, one of our business units is currently initiating a first inquiry into the accessibility of mortgages to understand if people with disabilities face barriers when trying to obtain a mortgage.
	Additionally, accessibility of banking services for Retail customers is addressed by local accessibility-related legislation and the recent European Accessibility Act (EAA), which is currently being implemented in national law within EU member states. Such legislation may impact ING's Retail Banking operations in the following areas: digital accessibility of banking services and products, equal access to actual financial services and products, communication and contact centres, e-commerce, ATMs and other self-service banking terminals. Such legislation could for example require that ATMs and other self-service banking terminals are voice-supported and provide adequate contrast for people with a visual impairment.



### Case study: adapting processes to counter age-based discrimination

In one of our business units an ING customer went to a branch office to obtain a credit card. In this ING country there is an age threshold included in the credit card issuance policy. The customer was above this age threshold and because of the existing policy, the credit card request was not approved.

Following ING's decision to not issue a credit card, the customer submitted a complaint to a local government agency about facing discrimination due to their age.

Looking for a solution, ING contacted the customer and was able to offer a credit card with a credit limit and explain in detail the conditions on having a credit card with a credit limit (collateral deposit, limit, etc.). The customer accepted the terms and agreed with this solution.

Following an internal discussion between the departments involved (Legal, Litigation, Lending Tribe and Risk Department), as well as the heads of this ING business unit, we reviewed the process for issuing credit cards. Customer-facing employees in this country were informed that they could review such applications on a case-by-case basis and offer a product suitable to the customer, overriding the age-limit policy if appropriate.

## Financial distress threatening customers' ability to meet their basic needs

We are aware that the products and services we offer our customers can have a significant effect on their financial health. If we fail to provide suitable banking products and services we may cause our customers serious financial distress, impacting (in extreme cases) their ability to meet their basic needs. Financial distress may occur as a result of:

- Inadequate communication or the use of an inappropriate language level when communicating with our customers;
- Offering non-suitable products;
- Not offering suitable products;
- Offering unfavourable rates.

The table below lists the causes, consequences and impacts of financial distress. We obtained the information from various sources: actual complaints raised by customers via complaints channels, Retail country colleagues who identified potential human rights impacts beyond what was submitted via complaints mechanisms, and internal human rights and financial health experts.



Cause	Actual and potential consequences and impacts for ING's customers	Cause	Actual and potential consequences and impacts for ING's customers
<b>Inadequate communication or inappropriate language level</b>	<p>Inadequate communication may result in financial distress. This may occur as a result of a mismatch in the language level of the information provided to the customer and a customer's level of understanding. This could apply, for instance, when the conditions of a changing financial product (eligibility for a loan/mortgage, payment, savings or other product), or costs (e.g. mortgage interest rates) are not provided to the customer in a way which is clear and comprehensible for the customer.</p> <p>In our assessment we found that our customers may experience financial distress for one of the following communication-related reasons:</p> <ul style="list-style-type: none"> <li>▪ language complexity, especially if product conditions change over the course of time and the customer does not sufficiently understand or notice the financial implications. This could create a financial burden the customer had not anticipated;</li> <li>▪ ING's services not being provided in all the official languages of a particular country;</li> <li>▪ carrying out unilateral changes to product conditions, which may lead to financial distress when a customer relied on the previous conditions when making a decision about the product.</li> </ul> <p>We also recognise that inadequate communication can include the absence of sign language opportunities when interacting with the bank. As sign language is the native language for the majority of the deaf community, second language (written) communication can be challenging for these ING customers. ING is exploring ways to improve accessibility for the deaf community. For example, ING Poland provides a digital sign language interpreter and we are currently investigating how we can provide opportunities for our customers to interact with the bank in sign language in other countries.</p>	<b>Offering non-suitable products</b>	We recognise that individuals may be potentially misinformed about the trade-offs between the expected risks and return of financial products. The mismatch between the risk-reward profile of the customer and actual exposure of their portfolio could cause financial distress, for instance, in the ability to bear losses, particularly for our most vulnerable customers.
		<b>Not offering suitable products</b>	We recognise that financial distress may also occur, or continue to exist, if a better deal is available for a savings or current account product, but ING does not offer it. This could affect a customer's long-term financial health, especially if they are already in a vulnerable financial position.
		<b>Offering unfavourable rates</b>	Increased banking costs could potentially put vulnerable customers at risk of financial distress. We recognise that, for instance, low-income households may struggle with bank fees that are affecting their ability to pay rent, food and utilities.



## Privacy abuses as a result of compromised integrity of customer data

Our global approach and policies in all of our Retail countries aim to ensure data privacy and integrity, and mitigate related risks for our customers. Nevertheless, we are aware that these risks are still present and incidents may occur as a result of improper disclosure of data to third parties (such as third party businesses we contract, who use customer data) or inadequate protection of data against fraud. If data is not sufficiently protected against fraud, this could lead to privacy breaches and even financial distress – for example if customers' compromised personal data is passed to parties who then take unauthorised actions, such as charges to customers' credit cards.

The table below lists the causes, consequences and impacts of privacy abuses. We obtained the information from various sources: actual complaints raised by customers via complaints channels, Retail country colleagues who identified potential human rights impacts beyond what was submitted via complaints mechanisms, and internal human rights and financial health experts.

Cause	Actual and potential consequences and impacts for ING's customers
The inadequate protection of data	<p>Via our complaints mechanisms, our Retail countries reported that incidents around the inadequate protection of data have happened occasionally. Additionally, although not reported via our complaints mechanisms, the risk of data breach also exists through the inappropriate sharing of customer data by the bank with third parties (e.g. in project collaboration with other commercial organisations); this may lead to a privacy abuse.</p> <p>To help mitigate these issues ING has put data protection policies and control systems in place, in accordance with the GDPR.</p>
Failing to protect against digital fraud or other data protection/privacy issues	<p>Failure by the bank to protect against digital fraud could expose customers to financial distress through financial or identify fraud.</p> <p>ING has developed a Bank Fraud Management framework aimed at mitigating critical, bank-wide risks and other high risks related to internal and external fraud.</p>

## Other identified risks and harms

### Human trafficking and modern slavery

We recognise that failure to detect signals of money laundering related to human trafficking and modern slavery may result in the lives of customers and/or other people being substantially harmed. This failure may occur through deficient monitoring of bank data through our Customer Due Diligence (CDD) and KYC processes, or through customer interaction with bank tellers. For instance, if a customer is a human trafficker and their activities remain undetected, the safety, security and dignity of their victims are at risk. If a customer is a victim of human trafficking, failure to detect signals of money laundering related to socio-economic fraud and human trafficking may stand in the way of saving that client from a harmful practice.

On a global level we have transaction monitoring systems and initiatives in place that aim to detect and fight financial and economic crime and money laundering. If we detect suspicious activities, an alert is issued and a KYC analyst conducts an investigation. In 2020, in the Netherlands, together with other Dutch banks, we established Transaction Monitoring Netherlands (TMNL) to enhance the fight against money laundering. The TMNL initiative is an addition to the banks' individual transaction monitoring activities, and it focuses on identifying unusual patterns in payments traffic that individual banks cannot identify. Moreover, to harmonise the fight against financial crime we work with the Dutch Banking Association, the Dutch central bank and public and private partners on preventative action to identify and combat Financial Economic Crime (FEC) threats.

Since 2017 ING has issued an annual statement in accordance with the Modern Slavery Act. This statement sets out ING's approach with respect to human trafficking, slavery, forced labour and child labour.

We continue to invest in controls aimed at flagging any circumstance in which our financial services may be facilitating human trafficking (such as through money laundering occurring via ING accounts). We also recognise that we can contribute to the fight against human trafficking by detecting its potential victims. Bank tellers play an important role here through the customer interactions inherent to their job. We believe that it is important that customer-facing staff know how to report this in order to help protect the customer.

## Managing salient human rights issues for our customers

In this section we elaborate on how we manage our salient human rights issues relating to our customers.

### Policies addressing discrimination and access to finance, financial distress, and privacy abuses

All countries have a wide range of policies in place that are directly or indirectly aimed at protecting (retail) customers. Although this chapter is about customers, several policies mentioned in the table below relate to managing employee behaviour. This is relevant, given that employee conduct is an important factor in what a bank can do to help protect our customers.

**Table 1 Policies in place that directly or indirectly deal with discrimination and access to finance, financial distress and/or privacy**

	Discrimination and lack of access to finance for basic needs	Financial distress that threatens customers' ability to meet their basic needs	Privacy abuses resulting from the integrity of customer data being compromised
Code of Conduct	■	■	■
Integrity, Anti-Bribery, Fraud and Corruption	■	■	■
Data Protection and Privacy			■
Investor Protection		■	
Anti-discrimination	■		
Communication with customer	■	■	■
Know Your Customer (KYC)	■	■	
Product Governance		■	
General Customer Complaints Handling or Customer Best Interest	■	■	■

To ensure that our employees are aware of these policies, our Retail countries offer dialogue sessions and elearnings on most of these (compliance) topics and communicate any changes in the policies.

The ING Customer Golden Rules, in place globally, are five principles aimed at ensuring customer centricity in product development and sales activities. The Rules apply to all business lines and customer types and are an integrated part of the Product Approval and Review Process. The ING Customer Golden Rules are:

1. We offer products and services suitable for the customers throughout the whole relationship lifecycle;
2. We offer products and services at a fair price considering the market, costs and risks;
3. We communicate information on products and services in a clear and non-misleading manner;
4. We provide services and trusted advice through professionals with the necessary knowledge and expertise;
5. We consider the Environmental, Social and Governance (ESG) risks and impact of our products and services.

## **Engaging with stakeholders**

As part of the process to identify our salient human rights issues, we consulted two external experts specialising in the fields of business and human rights, and responsible finance and financial ethics. Additionally, colleagues in our Retail countries communicate directly with customers who use the phone to lodge a complaint, or visit a local branch. These points of contact provide the customer with an opportunity to express their perspective on the issue in more detail, beyond the simple submission of a complaint via online channels.

In line with best practices and the United Nations Guiding Principles on Business and Human rights (UNGPs), we plan to continue building on the learnings from the saliency identification exercise by engaging with consumer organizations, civil society organisations, and other relevant organizations that represent the interests of affected stakeholders.

## **Assessing impacts and tracking performance**

The range of topics covered by complaints in the reporting period is broad. They include but are not limited to data breach, discrimination, accessibility of (online) banking services for older people and persons with a disability. We analyse and report on the number of complaints and topic trends internally to identify any changes we need to make in the services we provide. However, we are aware that not all topics may have been identified due to the complaint categorisation systems in place in our business units, (the categories for customer complaints are pre-determined and those categories may not always be able to flag human rights-related issues).



For instance, in one case a complaint was filed with one of our business units over a customer who was unable to get a credit card because of age restrictions that were in place. The case was addressed, solved, and analysed to ensure a ‘lessons learned’ outcome. However, the case was registered in the complaint system ‘credit card – granting access’, which is a categorisation that does not immediately signal its human rights relevance.

Additionally, some business units have identified that vulnerable groups such as refugees or those of lower socio-economic status are at greater risk of being excluded due to customer segmentation, while better services may be offered to those customers who represent greater monetary value for the bank. These examples come either directly from colleagues in our Retail countries or have emerged from our complaints mechanisms; in the latter case, the complaints were addressed directly and the findings integrated to ensure that necessary changes are made on a broader level (see next section).

This is a first step in understanding and identifying potential gaps in our reporting and categorisation of complaints. We recognise the need for a greater oversight of human rights topics as they emerge from our complaints mechanisms, as well as a need to address such issues in a more systemic way, not least by tracking our performance in managing complaints with relevance to our customers’ human rights.

## Integrating findings and taking action: continuous learning throughout the organisation

To ensure that recurrent and/or systematic problems and potential legal and operational risks are identified and remedied, all of our Retail countries have learning loops in place. These learning loops can also be used for continuous improvement in the area of human rights impacts. These include, but are not limited to:

1. Lessons learned sessions with implicated employees and departments in the complaints management process;
2. 'Complaints table' sessions where company trends and root causes are analysed and discussed, triggering process improvements and/or temporary actions to avoid replication of the issue causing a complaint;
3. A complaint registration tool that allows ING employees to register a complaint, thus providing the product owner (Customer Journey Expert) with information that can be used to improve the product or process;
4. An annual explanatory report to be presented to the Board, including a statistical summary of complaints and claims, a summary of the decisions made with the general criteria they contain, as well as recommendations and suggestions;
5. A Customer Experience Board Committee meeting every four months to highlight the types of complaints the bank receives.

ING Global Accessibility is currently working on an approach to create a feedback loop to report and identify accessibility related issues for certain older clients and people with disabilities as a follow-up to the plan presented in the 2020 ING Innovation Bootcamp finals.

In December 2021 ING became one of the founding signatories of the United Nations' Principles for Responsible Banking's Commitment to Financial Health and Inclusion. As a signatory we have committed to setting targets that contribute to the financial inclusion of customers. Additionally, this includes a commitment to report, within 18 months after signing, on financial health and inclusion targets, and thereafter annually on progress. The targets should be supported by measures in the areas of financial and non-financial products and services, internal processes, data analytics and/or partnerships. The aim is to promote financial inclusion and foster a banking sector that supports the financial health of customers. In 2021, we renewed our approach to financial health and inclusion and community investment to integrate it more closely into our core business in order to increase the impact on customers and target support to the local communities where we operate.

## Case study: accessibility of financial services for people with a disability in Germany

ING Germany has identified the lack of accessibility of financial services for people with a disability as an important human rights issue for their Retail customers. In response it has created an Accessibility Working Group (within Tribe Digital Leadership) consisting of experts from all relevant disciplines working to ensure that our digital channels become accessible for people with disabilities.

One example which reflects the importance of accessibility is about making sure that blind or otherwise visually impaired people are given essential information in an understandable manner. In this case, ING Germany noticed that screen readers read out the IBAN in our channels not digit by digit, but as one big number. Now we make sure that the IBAN is identified as such and that screen readers read it out clearly digit by digit aiming to ensure that no confusion occurs regarding the person's bank account number.

One of the most important learnings is that making a digital product accessible requires much more than just visual adjustments, such as colour contrast or text size. It is about

defining a logical content structure, using simple language, providing alternative text for images – and most importantly, ensuring the (assistive) technology works on all devices.

We have taken several steps to address the issue of accessibility. For instance, new features are designed with accessibility in mind, such as the newly implemented consent to the General Terms and Conditions. In this way, we gain experience and can demonstrate the complexity of the topic. In addition, the Accessibility Working Group in Digital Leadership, which contains designers, developers, testers, and customer journey experts, is developing guidelines on how we can integrate accessibility into our workflows and is working on pilot projects. To ensure the quality and effectiveness of these changes, in 2022 a selection of digital user flows will be audited by an external service provider specialised in accessibility; we will use the outcome to extract improvements, also for other user flows.

We recognise the importance of sharing knowledge across the organisation, especially on this topic; various people in the

organisation, such as designers, content editors, developers and project managers, all need to be involved to ensure we develop the right solutions. On the 11th Global Accessibility Awareness Day (GAAD), a worldwide awareness day led by the GAAD Foundation, we organised a special information session to discuss challenges and solutions around accessibility. The session included discussing how special interaction patterns such as alerts and dialogues need to be coded correctly so they can be recognised by assistive technologies. There was also a discussion around documents including how dynamically generated PDFs need to be accessible for assistive technologies. Additionally, an initiative with the Retail Product Tribes was launched, which allows for knowledge sharing and coordination of needed improvements. Also networking with colleagues from other countries is an important practice to allow for knowledge sharing and defining standards.

## Providing effective remedy

### Filing a complaint

All countries have customer complaints policies in place. ING's customers can file a complaint via a variety of channels.

These include:

- Phone;
- Mail and e-mail;
- Web and paper complaint form;
- Online banking system (using chat or message function);
- Relationship manager;
- Branch office (meeting with an agent);
- Social media (via public or private messages);
- External financial service ombudsman<sup>5</sup>;
- Arbitrators and mediators.

ING seeks to address all complaints brought forward by customers. However, it must be noted that not all responses and decisions favour the customer's position on the issue. In such cases we explain our response to the customer.

### Complaint procedure and process across the organisation

Considering the legal and regulatory requirements, and the structure by which ING's business units are organised, each Retail country has its own procedure for handling a complaint. Here, we want to address the main commonalities and differences revealed by the survey, and provide a few examples.

The information collected from the survey reveals that there are several overarching **commonalities** in the complaint-handling procedure of the majority of business units.

- All individual Retail Banking customers can bring forward a complaint.
- All countries have multi-layered complaint resolution systems. The complaint is first analysed by an ING employee, typically a customer or product specialist, knowledgeable in the topical area addressed by the complaint. However, if the complaint is complex and requires in-depth research, addresses a recurring issue or requires additional expertise, it is redirected to the appropriate ING department or, if required, an external independent body.
- In most of our countries, the progress and subject matter of the complaints are handled via a tracking tool. However, considering that product and service offering differs across countries, each business unit has its own categorisation systems in place, and, with a few notable exceptions, these tracking tools are not yet focused on tracking complaints on the basis of human rights themes.

<sup>5</sup> An individual customer can file a complaint with an external financial services ombudsman in the Netherlands, Germany and in Australia.

- Eleven out of 12 Retail country offices have a dedicated complaints department.<sup>6</sup> Depending on the country the dedicated department deals with product- and/or process-related complaints; complex complaints are addressed by other relevant departments. The complaint departments of our Retail countries vary in their tasks, and these include but are not limited to examining complaints, providing solutions, ensuring customer satisfaction and conducting cause analysis.
- All customers are informed of the outcome of their complaint.
- Complaints are registered or otherwise archived to ensure that recurrent issues are analysed and, if possible, resolved by the appropriate departments.

Next to these overarching commonalities, Retail countries also markedly differ:

### **1. The timelines for resolving the complaint and the practice of interim updates**

ING's aim is for all countries to address a complaint within five working days.

If this is not possible, depending on local legislation, a complaint typically needs to be resolved in the range of 5-30 days with the requirement of a written response.

Additionally, some countries inform the customer of the registration and progress of the report as the issue is being addressed, while others only inform the customer of the outcome of the complaint.

<sup>6</sup> The country without a dedicated department made major organisational changes in 2021 and the previously existing complaints department is no longer functional. However, over 80% of complaints is now handled within Contact Centre structures; teams from disbanded units were transferred to these centres. Complaint process ownership and complaint management is centralised in a Centre of Expertise Customer Experience.

### **2. The departments responsible for resolving the complaint**

Depending on the structure of the business unit, the service offerings and the subject matter of the complaint, the following departments and officers are involved in resolving the complaint at different stages:

- Customer Service;
- Compliance;
- Legal;
- Loan administrator;
- Relationship manager;
- Product owner.

Additionally, if the complaint may not be resolved by one of ING's departments, the customer may also refer to a number of external bodies, which vary by country, such as:

- a. Independent financial ombudsman;
- b. Arbitrator (e.g. Arbitrator for Financial Disputes, Financial Banking Arbitrator);
- c. Mediator (e.g. Financial Services Complaints Tribunal).

### **3. Reviewal of complaint policies**

Some Retail countries review their complaint procedures annually, some to meet internal goals and external stakeholder expectations, others to comply with legal requirements. Additionally, each business unit has different departments involved in reviewing complaint policies.

## Example: Australia

Complaints are received, processed and resolved via the following process:

1. A complaint may be received through different channels and by different teams (such as by the contact centre, the collections team, payment operations or the customer excellence team).
2. If a complaint is resolved to the customer's satisfaction within five business days, a written response is not required.
3. If a complaint cannot be resolved within five business days, it is investigated by the customer excellence team. Based on current regulatory guidance a written response must be provided to the complainant within 30 days from the date of receipt.
4. In the written response the customer must be informed of:
  - a. the final outcome of their complaint;
  - b. if they are dissatisfied with the outcome and/or response provided, they have the right to request an independent review by the financial services Ombudsman.

## Example: Germany

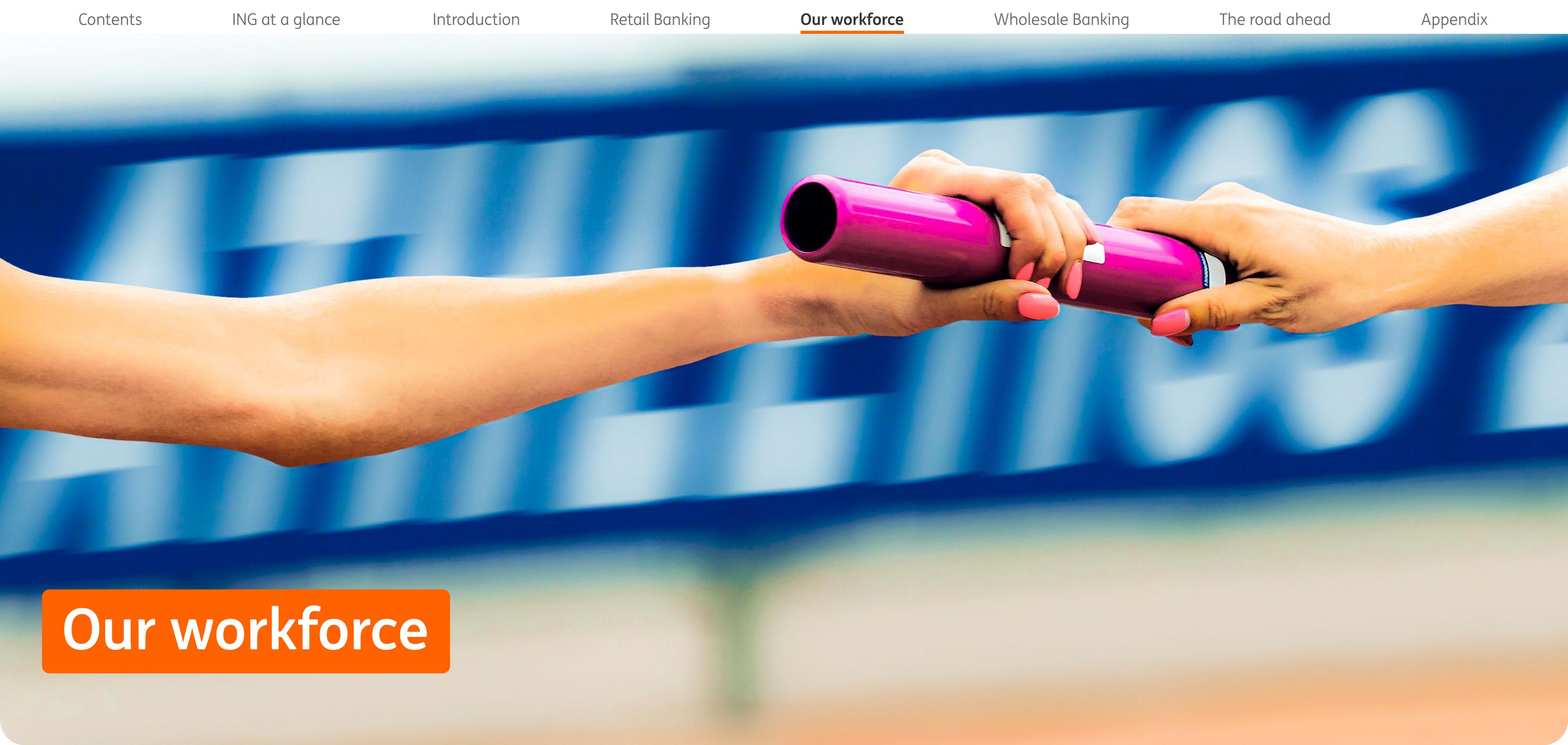
Complaints are received, processed and resolved according to the following procedure:

1. Complaints submitted are reviewed and processed and the reason for the complaint is determined and recorded.
2. The reason for the complaint is examined and analysed; this is led by specially trained sales-independent employees.
3. There is a neutral assessment of possible errors, omissions and misunderstandings, on the basis of which an objective decision to answer the complaint is made. The need for additional measures is also evaluated at this stage. When dealing with complaints, the relevant specialist departments and, if necessary, other independent internal bodies are involved to clarify the facts.
4. For complaints that cannot be answered within a reasonable period of time, a confirmation of receipt or interim confirmation is sent. As a rule, the response to the complaint should be sent within five working days.
5. The result of the complaint process, or clarification of unclear facts, will be communicated to the complainant in writing (and by telephone if necessary). If the customer's complaint is justified, we aim to provide remedy. Case handlers also have the option of granting goodwill payments to restore customer satisfaction. Clerks in contact with customers have decision-making authority regarding the evaluation of proper remediation based on their respective areas of expertise. If a complaint cannot be assessed by the case handler or their manager, both legal and second-line colleagues can be involved.
6. If the complainant is not satisfied with the decision, they may contact one of the conciliation bodies – the ombudsman of the private banks or the BaFin (Federal Financial Supervisory Authority), or file a civil lawsuit. The settlement of disputes with the bank, within the framework of the ombudsman procedure, is regulated in the Rules of Procedure for the Settlement of Customer Complaints in the German Banking Industry.
7. Sales-independent, specially trained employees document the complaint for internal and external reporting purposes.

## Creating awareness around complaints policies and procedures

We recognise that it is not only important to have complaints policies and procedures in place, but also to ensure that their existence is effectively communicated. We try to ensure that our customers are aware of their right to lodge a complaint, and how to do it, through a variety of channels. The most common way of informing the customer of the complaints procedure is via the business units' websites or applications used in their respective countries. Some Retail countries include a complaints section on the first page of their website. For customers who prefer to use a different channel, there is the option of calling the customer service centre or visiting the branch office; confirmation that the complaint has been filed is also sent to the customer. In keeping with local regulations, comprehensive information about appealing against a complaint decision is included in the response. Additionally, to ensure that complaint policies and procedures are easily accessible, and their implications understandable, the content is given in clear and simple language as required by ING's Customer Golden. For instance, Poland uses simple language rules – a communications standard guided by 13 principles (e.g. be straightforward, start with the most important information, etc.); this ensures that the content is easily understandable. This is especially important for complaints policies and procedures, but also for responses, which may contain a lot of technical information.

Our initial salience assessment has provided us with improved insight into human rights issues related to our customers in the different markets where we operate, while retaining the highest possible level of consideration for country-specific risks. The ultimate goal was to identify salient issues in the Retail banking services we offer our customers, to understand our impact, and to further our efforts to prevent and address impacts. Now that we have deeper insight into the three salient issues – discrimination and lack of access to finance for basic needs, financial distress that could threaten customers' ability to meet their basic needs, and privacy abuses as a result of compromised integrity of customer data – we aim to engage with affected stakeholders, disclose more information about these salient issues and address gaps in how we manage them.



## Our workforce

Update on salient human rights issues

## Focus on our salient issues

As an employer, we impact the lives of over 57,000 employees worldwide. We potentially impact employees' right to health and a safe working environment, as well as the right of their families – including children – to leisure, play, family environment and education. Healthy employees contribute to healthy families and communities.

ING's management of staff is based on our Group-wide policies but also reflects local conditions and norms.

To understand the impact we have on our employees, in 2018 we carried out a salience assessment which resulted in the identification of two salient issues:

- Workplace discrimination;
- Work-related stress.

For additional context, we encourage readers to read our salience analysis and our understanding of salient issues for our workforce in the [2018 human rights report](#).

Monitoring our salient human rights issues is an ongoing effort. In an ever-changing world, we need to be prepared to act on sudden changes, such as the Covid-19 pandemic, and their potential impact on our employees. In the 2020 update of our human rights report we reflect specifically on the impact of the Covid-19 pandemic on our employees. This year we outline how ING is working on the salient human rights issues identified in our workplace: discrimination and work-related stress.

## Our workforce: the scope

The scope of our workforce in the salience analysis includes permanent and temporary staff. Permanent staff are those who have a direct employment contract with ING, while temporary staff are those who provide support on dedicated projects, but are employed via an agency; they do not have direct employment contracts with ING. The temporary staff, also known as 'contingent workers' are part of ING's strategic workforce. However, they do not fall under ING's collective labour agreement (CLA). In some countries they are protected under their own CLA. In the Netherlands for example, the temporary worker's CLA largely reflects ING's CLA with its permanent workers, as required by local legislation.

While those who are self-employed are not included in the scope of this review, we recognise that they also face certain risks. For instance, people who are self-employed and provide services to ING, being consultancy services for projects or ad-hoc services, do not have the same protections and benefits as those in salaried employment. They may, for example, face bankruptcy in the face of unforeseen circumstances and/or a lack of good financial health practices. To raise awareness of these issues ING Netherlands has prepared a one-page document outlining the importance of good financial health practices for the self-employed, such as health insurance and pension plans, along with additional information covering responsibilities and risks. Since in most cases ING contracts the self-employed via a broker, this document is usually included in the broker's contract.

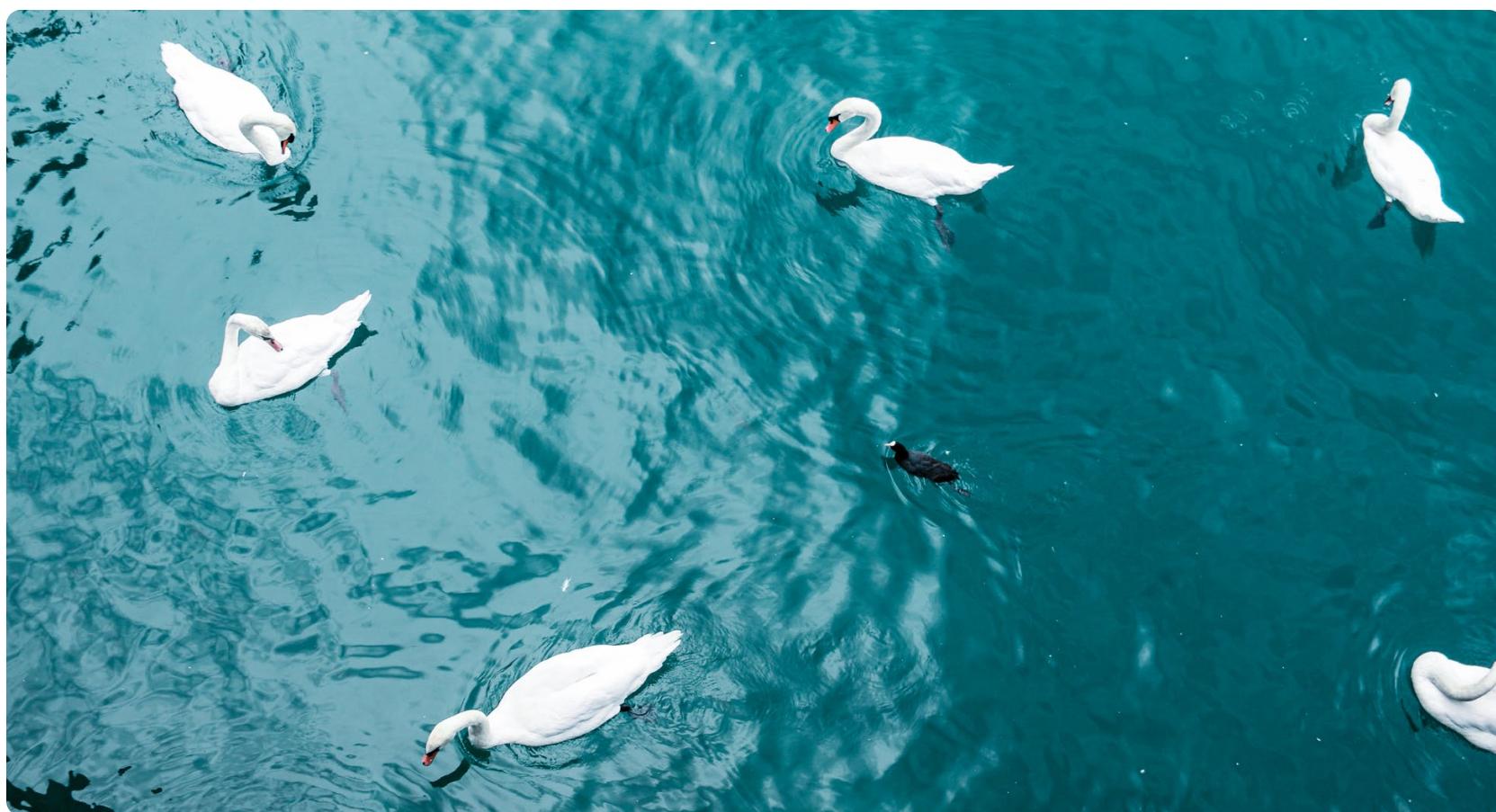
While recognising that ING could be contributing or be directly linked to negative impacts on workers and communities connected to our suppliers, these workers and communities have not been included in the scope of our workforce and impacts on them have not been addressed in this update report.

On a global level, suppliers must go through ING's supplier qualification process Know Your Supplier (KYS), which helps us determine the levels of social, environmental and financial risk associated with a supplier. Within this process, our due diligence approach varies based on the value of the contract with the supplier. Suppliers that successfully complete this process and attain 'Qualified' status have the potential to become an ING supplier. As part of KYS, suppliers are screened for Environmental and Social Risk (ESR) and sustainability risks and performance. Suppliers who require further due diligence must agree to sustainability, environmental and social risk policies that incorporate the UN Global Compact's ten principles. By doing so, they acknowledge and agree that they will and do comply with the stated principles on human rights, forced labour, child labour, fair labour standards, environmental protection and anti-corruption standards.

We have also developed a Supplier Sustainability Code of Conduct. As of 2022 this must be included in new procurement contracts in the Netherlands. The Code includes our expectation that the supplier and their subcontractors respect the human rights of their own employees, as well as those in their supply chain, as indicated in Principles 1 and 2 of the UN Global Compact. The following rights are also made explicit in the Code of Conduct: fair remuneration and working hours, no forced labour, child labour, discrimination or harassment, and freedom of association, occupational health and safety and whistleblowing.

## Discrimination

ING stands against all forms of discrimination and our policies and initiatives aim to prevent discrimination within our company. We recognise that discrimination can affect a person's physical and mental health, sense of belonging, sense of agency and sense of personal value. It can even cause an employee to feel unsafe at work. Discrimination can also lead to loss of income and development opportunities. It can have a negative effect on wellbeing and socio-economic opportunities. We identified that discrimination is a risk in all of our countries of operation. It can occur in any location and facet of employment, for example, when employees are being hired, discharged, promoted, being referred or in their daily work-related interactions.



## How we address the potential impacts of discrimination

Below is a list of our current policies, initiatives and programmes that address discrimination.

### 1. Policies

- [Global Code of Conduct](#), with a mandatory e-learning for all employees.  
In 2021 we added the issue of transgressive behaviour;
- [Orange Code](#): our Values and Behaviours;
- [Diversity Manifesto](#): applicable to all employees worldwide, addressing what diversity means to ING, why it is important, and what employees can do to promote diversity and inclusive behaviour;
- [Human Rights statement for employees](#).

### 2. Initiatives to promote a diverse and inclusive workplace

- [A Diversity and Inclusion approach](#);
- Appointing dedicated diversity and inclusion ambassadors in the countries and business units;
- Trainings and elearnings on diversity and inclusion topics;
- The 70% principle;
- Global diversity and inclusion day/week;
- Improving the leadership appointment process;
- Diversity employee networks.

### 3. Channels for employees to raise concerns

1. Whistleblower channel;
2. Confidential Advisor (in the Netherlands and Belgium);
3. Employment Relations Consultants (in the Netherlands);
4. Line Manager;
5. Trade Unions;
6. Employee Communities.

### Board statement on discrimination

As a global bank with a diverse workforce we recognise our responsibility to eliminate racism and other forms of discrimination from our organisation. In early June 2020, in light of the Black Lives Matter movement, the Management Board Banking issued a statement denouncing all forms of discrimination.

**“ING denounces all forms of discrimination. We have measures in place that aim to keep discrimination from happening within our company – towards both our customers and employees. We make a conscious effort to include all people, no matter what their cultural background, experience, religion, sexual orientation, perspectives, viewpoints etc. This is part of our ongoing efforts to create meaningful change.”**

The statement goes on to encourage employees to speak up if they encounter discrimination, or other behaviour they are not comfortable with, at work. Employees are also encouraged to be open-minded, value differences, listen, and speak openly and honestly about what's going on and how certain behaviours make them feel. We talk about how we are tackling discrimination in ING.

We recognise that discrimination is an issue that requires a continuous and proactive approach. Our global Code of Conduct and Orange Code reinforce the values and principles under which we operate. One such principle is creating a safe work environment, which includes zero tolerance for discrimination. Additionally, within our organisation we have various initiatives that aim to address discrimination and promote diversity and inclusion, including the ones described in this review.

### **The 70% principle – using data dashboards to help achieve our goals**

In 2018, ING introduced a new principle to help bolster diversity within our organisation. The 70% principle gives managers a goal for building mixed teams around appropriate dimensions of diversity (with a focus on gender, nationality and age group). It strives for a 30% difference in team make-up, meaning that no group or level comprises more than 70% of the same gender, nationality or age group. In 2019, we continued to work with the countries and business lines to refine and implement their plans to work towards the 70% principle. We also initiated a deep-dive across ING into diversity dimensions and set up dashboards to help different areas of the business monitor their progress.

For 2021, looking at the global make-up of ING, we collectively meet the 70% principle across all three dimensions. However, within individual teams and on a country level there are different, often complex challenges in creating the mixed teams we strive for, and we are not always making progress at the speed we would like. Dashboards help us understand where the challenges lie, identify the gaps and monitor progress towards building mixed teams at different levels of the organisation. The HR teams use these dashboards in their discussions with local management teams.

### **Diversity at the top**

When looking at the composition of our Supervisory, Executive and Management Boards, we aim to balance regulatory requirements, suitability considerations, diversity, banking and other industry knowledge, conflicts of interest, availability, etc. Other considerations include regional representation, age, gender and expertise.

While ING understands that getting the right mix of people is a challenge, we are committed to making progress in achieving diversity at the top. To this end, we plan to accelerate the development of internal candidates for top roles and attract more diverse candidates from the external market.

In 2021, we conducted research with an external partner to help us better understand our leadership pipeline and identified actions that can help us to improve its diversity. These actions include proactively building forward-looking plans so that succession-planned candidates can be appointed when an opportunity arises. To bring more diversity into succession planning we use a template that visualises the gender and nationality of the current role-holder and their successors; we aim to create a more balanced pipeline of candidates on succession lists for around 400 senior roles. Diversity is considered a key part of our annual talent review process and we have integrated the 70% principle into the leadership appointment process. The introduction in December 2021 of a new global job classification, Global Job Architecture (GJA), will also help us identify competencies and opportunities for every role at ING. Previously job profiles were defined locally; now we can compare, match and understand jobs across borders and business lines, enabling us to make more informed decisions about our organisational structure, workforce planning, benchmarking and diversity.

On 1 January 2022, the Gender Diversity Act came into effect in the Netherlands and required ING to set appropriate and ambitious targets for gender diversity in its Executive Board and senior management. In our next Human Rights report, we plan to disclose where we are on these targets.

### A proactive approach to inclusion

As of 2021 we have more than 30 employee networks and employee-led diversity and inclusion initiatives globally, where employees come together to discuss diversity issues, promote diversity at ING and create an inclusive culture in the workplace. These networks are active in the areas of cultural diversity, LGBTQI+, age, gender and disability.

- The Lioness network, for instance, aims to help women realise their ambitions.
- BEING is ING's Black Employee Inclusion Group;
- Rainbow Lions aims to support the LGBTQI+ community within ING to create the right conditions for a trusted working environment globally;
- Experience aims to achieve senior inclusion;
- RING is our community for young professionals under 36;
- Enable is an inclusion network covering disability and accessibility at ING.

Enable employee network started an Employee Resource Group (ERG) working on improving the accessibility of global mandatory trainings and testing these in collaboration with the D&I Learning group as a means to promote inclusive learning for employees with disabilities.

To showcase diversity within ING and to help everyone feel included, whatever their background, culture, experience, religion or sexual orientation, we run global diversity and inclusion events. The most recent one being in 2021, where all employees globally were invited to participate in a global diversity and inclusion day with over 100 global initiatives, inviting employees to think about their unconscious biases under the theme, 'How inclusive are we really?'

ING currently employs people from over 130 different nationalities around the world.

### Diversity and Inclusion – commitments and achievements

These are some of our efforts, and achievements, that reflect our commitment to promoting diversity and inclusion in our organisation:

#### Bloomberg Gender Equality Index

ING is one of 418 firms recognised in the 2022 Bloomberg Gender Equality Index as a company committed to a more equal and inclusive workplace. The Index offers public companies the opportunity to disclose information on how they promote gender equality across five separate areas: female leadership and talent pipeline, equal pay and gender pay parity, inclusive culture, sexual harassment policies, and pro-women brand. This is the seventh year we have been included in the index.

## Financial Times Diversity Leaders

ING has been officially recognised by the [Financial Times](#) as a diversity leader. In an independent study assessing employees' perception of companies' inclusiveness or efforts to promote various aspects of diversity, in 2022 ING was listed 225th out of 850 companies. The Financial Times looked at a wide range of employers focusing specifically on gender, age, ethnicity, disability and sexual orientation.

## Declaration of Amsterdam

ING was the first company to sign the [Declaration of Amsterdam](#), a commitment to take leadership in creating a corporate culture where LGBTQI+ employees are valued, can be themselves and can realise their full potential.

## Workplace Pride Global Benchmark

ING is a founding partner of [Workplace Pride – International platform for LGBTQI+ \(Lesbian, Gay, Bisexual, Transgender, Queer and Intersex\) Inclusion at Work](#). Its activities include the International Workplace Pride Global Benchmark. Every year ING is scored in eight areas and assessed to identify best practices, looking into ways to raise standards on Policy and Communication, Employee Networks, Workplace Awareness, Support and Benefits, Inclusion and Engagement, Expertise and Monitoring, and Business and Supplier Engagement.

In 2018 we received a score of 46.3%, putting ING in the mid-tier (middle third) of all participants. The report gave ING areas of focus to improve on, in particular Support and Benefits and Policy and Communication. In the years that followed, ING has taken steps to address the feedback of Workplace Pride and create a more inclusive work environment.

Since then, in the area of Policy and Communication, we have created clearer and more specific language in our communications around inclusion. We also took steps to adopt policies important to the LGBTQI+ community in our business units. In the Philippines for example, we adopted an AIDS and HIV Prevention Policy, which aims to ensure the implementation of programmes on non-discrimination, awareness, and health support for HIV/AIDS prevention.

A number of improvements were also made regarding Support and Benefits. One of them was to change the wording used in the Parental Leave Employee Scheme under our Dutch Collective Labour Agreement, making it applicable to any employee, regardless of sex, who has a family-law relationship with the child (or children) in their care, or lives with the child (or children) at the same address and has taken on the care on

a permanent basis as if the child (or children) were their own. A second improvement was the introduction of an additional 1.5 days of paid leave (Diversity Days) to be used specifically for diversity purposes. The impact, of course, stretches much wider than the LGBTQI+ community alone. For instance, employees may use these days to celebrate religious holidays that are not official holidays in the Netherlands.

The measures introduced by ING, and activities in the countries where Rainbow Lions communities are active, aim to support our employees who belong to the LGBTQI+ community. Together, they have resulted in a benchmark rating of 77.2% and top-tier (upper third) classification in 2021. Consequently, while participating organisations grew to over 80 members, ING maintained the Workplace Pride Ambassadors award status in the Netherlands for the third consecutive year.

## Business Disability Forum

ING is member of the [Business Disability Forum](#) (BDF). In collaboration with BDF members and partners ING is taking part in the setting the benchmark for disability inclusion and accessibility maturity of businesses.

ING is active in the [BDF Global Taskforce](#) developing a framework for global strategies, global policies and approaches towards disability inclusion of, and accessibility for, employees and customers. With the work from the members of the Global Taskforce, BDF provides guidelines for its members to improve disability inclusion and accessibility in Global Businesses, moving from a local approach to an overall business strategy.

## Work-related stress

Work-related stress can be caused by several factors, such as discrimination, undesirable behaviour, the emotional demands of the job, the number of hours worked or a skewed work-life balance. But whatever the cause, it can have a host of negative effects. Different people have different thresholds for work-related stress; while one person may thrive when faced with certain challenges, the same challenges may be too much for others. In the long term, if not addressed correctly work-related stress can increase employee turnover and lead to disengagement, illness, (long-term) absenteeism and a potential loss of income; it can also interfere with a person's right to health and decent work as the effects of stress spill beyond the workplace.



As with discrimination, work-related stress is a risk in all the countries where we operate. Our employees have the right to a workplace where they can be physically healthy and mentally resilient and can pursue a work-life balance that works for them personally and professionally.

### **Keeping track of Covid-19's impact on our workforce**

For most of 2021, the majority of ING employees continued to work from home due to ongoing Covid-19 restrictions. This put extra strain on our people as a result of the ongoing uncertainty of the situation, the disappearing boundaries between work and life as many people worked at home, and the social disconnection that put their wellbeing under pressure.

In some countries it was possible to cautiously return to the office in what we call our Hybrid Mode, which combines the advantages of working from home on several days of the week with the benefits of collaborating with colleagues in the office on the other days. We prepared managers to work in the Hybrid Mode by providing them with a training on managing teams working in this way. This created awareness around people's different preferences regarding how and where they work (office vs home). Each manager and team was strongly encouraged to make team agreements on the mix of working from the office and working from home. The aim of the Hybrid Mode is to offer flexibility around where (office or home) and when we work, while also respecting each other's preferences. We believe that the Hybrid Mode could enhance people's overall wellbeing, engagement, collaboration and effectiveness.

However, a large degree of flexibility is required, given the constantly changing situation as new Covid-19 outbreaks occur and the emergence of new variants continues to test the resilience of our people. In implementing our Hybrid Mode, we're taking a step-by-step approach that provides flexibility for local implementation and respects local health and safety guidelines and labour laws. We'll adapt and improve as we go along, weighing up personal, team, company and customer interests when determining what works best.

### **How we address the potential impacts of work-related stress and support employees' vitality**

The vitality of our employees remained a high priority in 2021 and 2022 as Covid-related challenges continued. Apart from finding new ways to collaborate, managers developed methods to motivate and engage their teams remotely, while also managing their own vitality. For colleagues who were unable to work from home, we adapted our offices in accordance with health and distancing recommendations to ensure that they had the option to work from the office. Our local businesses came up with various initiatives to help employees maintain their physical and mental vitality.

ING's Vitality programmes aim to support our people in staying physically healthy and mentally resilient to work-related stress, which was exacerbated by Covid-19.

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**At ING, we use the term 'vitality' to talk about our employees' wellbeing, which reflects, among other factors, the degree to which we and they are managing work-related stress.**

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Below is a list of some of our measures and support programmes aimed at addressing the impacts of work-related stress:

### **1. Measures to promote a healthy work space:**

- Ensuring every local ING entity tracks sick leave;
- Promoting flexible working to help employees better manage their work/life balance – this has been reinforced with our Hybrid Mode;
- Ensuring company counsellors are available in many of our locations;
- Providing reintegration support for colleagues returning to work after extended absence;
- Promoting a healthy work culture, and monitoring performance through employee surveys.

### **2. Additional, locally tailored support:**

- Providing a Health and Safety department in the majority of ING business units to promote employees' wellbeing; this includes information and programmes around stress-management.

Since the 2018 human rights report we have taken additional steps to address the potential risks of work-related stress:

### **Global initiatives:**

- Employee surveys: during the Covid-19 pandemic, we launched a global 'sentiment pulse' to gauge how our people were feeling – whether they felt cared for as a person and whether they believed ING provided adequate support during Covid-19. This sentiment pulse will continue to be used post-Covid.
- Employees assistance programmes: these were established in the majority of our local entities to provide psychological support. Various countries offer wellbeing coaching or counselling.
- Support for ergonomic home workplaces: these were established in the majority of local entities, encouraging the health of our people working at home.
- Webinars and events: these were organised by most of our local entities to help people stay physically healthy and mentally resilient, and covered topics such as physical exercise, nutrition, sleep mindfulness and stress management techniques.
- New head of Vitality role: this was created at the end of 2021 and is responsible for aligning our local Vitality initiatives and developing programmes to enable employees to recognise and jointly address the root causes of work-place stress.

## Local initiatives to enhance employees' vitality and address work-related stress

Our local entities have put programmes in place to address and mitigate work-related stress dependent on employees' needs and local context. Local business units came up with a range of creative solutions to help employees stay fit, from online wellbeing coaches, and psychological support to tips on how to deal with stress and workload and advice on the importance of taking a holiday. These initiatives include:

- My Vitality: an online platform launched in the Netherlands, Belgium, and Luxembourg where colleagues can team up for runs, walks and other activities.
- The Wellbeing Quotient (WQ): launched in the Netherlands this is a programme specifically designed for teams to motivate and support each other in becoming fitter, healthier versions of themselves – and have fun together while doing so. The programme focuses on improving employees' physical and mental wellbeing. It comprises modules based on energy, recovery, eating, exercise, sleep and relaxation as well as an action plan. Since its launch in Wholesale Banking in 2018, 10,000 people have completed the WQ programme.
- In Belgium the Coach and Care programme includes a number of initiatives to help staff maintain their positive energy and to provide support. The initiatives include training around energy and stress prevention, relaxation rooms and an employee assistance programme offering individual coaching to employees and their family members who encounter difficulties in their personal or professional lives.
- The Leading WellbeING programme in Germany trains leaders to support and enhance wellbeing in their teams. It also offers half-day trainings for employee health dialogues and half-day health check-ups, as well as a health budget they can use for their own preventative health activities. Employees also have access to resilience coaches, resilience workshops, sports and nutrition coaches, flu-jabs and sports groups in all of ING's locations in Germany (organised by employees themselves and sponsored by ING).
- Italy and Belgium have launched a set of 'healthy working habits'. These were communicated by the country's management teams and promoted shorter meetings so people can have more breaks, no meetings after regular working hours, planning focus time and avoiding sending emails in the weekends.
- In Romania we created a multi-skilled task force team that is activated when there is an incidental workload increase; we also organised sessions for people managers, facilitated by organisational psychologists, on how to tackle stress and workload.
- In Spain we are in the process of developing a tool for colleagues in the retail branches to monitor the factors that affect workplace safety and employees' mental health.
- The Netherlands and Poland are working on initiatives, together with the business, to identify the root causes of work-related stress and then identify initiatives to address them.
- France launched a 'no meetings' challenge to enhance employees' focus time.
- UK has launched a platform called Rungway that solicits employee feedback in an anonymous way on a range of topics including wellbeing and inclusion.

In the Netherlands, employees have access to an online resilience-building platform, where Resilience Coaching Tracks were developed on a number of topics around professional development, wellbeing and stress, and transition. Through a '13-week challenge' employees can train their resilience and build a habit of self-reflection through 13 weekly themes and 65 daily bit-sized exercises, either with written support from an 'e-coach' or as a 'Do It Yourself' journey. In addition, over the course of seven months, 10 webinars were organised with subjects such as Burn-out, Psychological Safety at Work, and Empathy at Work. These webinars could be attended without registration, making participation by employees more accessible. In addition, management teams were trained and coached by the same specialists who had coached them on how they impact those working under them, and on how to initiate dialogue and secure a safe working environment where employees feel safe to speak up.



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In the past two years, Covid-19 has provided many challenges for our people and their health has been top of mind. Vitality, along with Diversity and Inclusion, are two of the key pillars in our global people strategy as we see it as essential to our business success.

Our vision is that everybody in ING contributes to an inclusive work environment in which people feel empowered to lead their vitality. When our people are physically healthy, mentally resilient, feel socially connected and can integrate a sense of purpose in their work, they can perform to their full potential. We want to embed vitality in how we work together: empowering people to make balanced choices in work and life, every day.”

– Wing Kiu Siu,  
global head of Vitality



## Reporting and addressing grievances

We understand that it is not always easy to raise concerns, and that is why we have created multiple ways for ING employees to do this, on a range of topics or issues. Employees can reach out to their managers if they feel safe to do so. They can also contact one of our internal employee networks or trade unions; ING works with different trade unions worldwide. In addition, employees can report a grievance through our whistleblower channels.

ING has a Whistleblower Policy and provides whistleblower channels for employees who wish to raise concerns, anonymously, without fear of reprisal. ING's Whistleblower Policy stipulates that ING will not discharge, demote, suspend, threaten, harass or in any other way harm the employment status of a whistle-blower who has reported a concern in good faith or of an employee who participates or has participated in an investigation following a reported concern.

Concerns are recorded in accordance with specific categories. There are 19 different types of concerns reported as part of [ING's Additional Pillar III Report 2021](#), including discrimination and work pressure/non-realistic targets. These are limited to concerns reported through the dedicated whistle-blower channels as alternative to standard reporting and escalation channels. The concerns are reported periodically (in numbers and on content, if necessary) via the Head of Compliance up to the level of the Supervisory Board.

In 2021, there were 10 discrimination concerns reported and 24 work pressure / non-realistic targets reported. For a full overview of number of concerns reported, please refer to [ING's Additional Pillar III Report 2021](#)

When a concern is raised via our whistleblower channel, ING's Whistleblower Reporting Officer and/or another authorised individual, carries out an investigation. If the concern is not in the scope of the policy, it is redirected to the appropriate channel within ING.

In the Netherlands, where we have substantial operations, additional channels are available – ING's employment relations consultants and confidential advisors; the latter are also available in Belgium. They are ING employees and can both be consulted on a variety of matters. These internal complaints mechanisms work impartially and independently, and the advisors and consultants are bound by a duty of confidentiality.

Generally, employment relations consultants play an important role in cases where employees wish to raise complaints regarding (year-end) assessments, redundancy, the way ING supports individuals in a new role and ING's part in mediation in accordance with the Social Plan.

When an employee identifies or faces undesirable or transgressive behaviour, sexual intimidation, violence, bullying, discrimination (physically or orally), they can also contact an integrity confidential advisor. If the dispute cannot be resolved by way of mutual consultation and with the intervention of the confidential advisor, or if the employee, after a discussion with the confidential advisor, decides they would still like a formal investigation, they can file a report with the compliance officer, the internal or external whistleblower line or ING's Committee on Undesirable Behaviour.

Confidential advisors are also available for team discussions on the subject using presentations or workshops on Desirable and Undesirable Behaviour.

With the aim of contributing to a safer working environment, and to help employees' understanding of the reporting process, an e-learning is available to all employees that explains what constitutes undesirable behaviour.

However, we understand that even when an employee reports a grievance internally, they might also want to report it externally and external channels are available for this.

While we encourage the use of reporting channels, and strive to make it easier to access them, we find it predominantly relevant to invest in prevention. We choose to do so by implementing a variety of measures, including the e-learning mentioned above, presentations and workshops. By having these additional actions it is our objective to ensure a safe working environment.



# Wholesale Banking

Reflections and updates

## Environmental Social Risk (ESR) Framework update

ING's [ESR Framework](#) has been in place for over 15 years and is founded on ING's values, our respect for human rights and the need to address climate change. The framework sets out the minimum requirements in the provision of financial services to our clients and we use it to actively manage potential climate and human rights risks; we encourage clients, peers and others to do the same.

The ESR framework is reviewed regularly to ensure we adequately identify and manage not only existing but also new environmental and social risks. We conducted a full review of the ESR framework in 2021, following a three-year review cycle, and updated the framework accordingly. The review was carried out with the active participation of internal and external stakeholders, which includes civil society representatives.

In our updated ESR Framework, we took into account the recent ESR-related elements laid down in the European Bank Association (EBA) Loan Origination and Monitoring guidelines, as well as improved controls and comments received from internal and external stakeholders. The update further aims to improve understanding of existing process and evaluation requirements, with special attention given to supply chain due diligence to address potential risks of environmental impacts and abuse of human rights. Where appropriate, internationally acknowledged certification standards and guiding principles have been added to, or adjusted, according to individual sector policies. The human rights policy was updated to reflect our commitment to the UNGPs and improve transparency to reflect the ongoing developments on human rights impacts globally, changes include reference to the Dutch Banking Sector Agreement on Human Rights' (DBA) corresponding working papers and the further explanation of

one of our salient human rights issues – land related community issues. In the 2021 review, we introduced a new sector policy on the maritime sector which reflects our requirements on vessel recycling and decommissioning and includes an inventory of hazardous materials.

The ESR Framework now also includes a mandatory self-assessment for our Business Banking clients when active in certain high-risk industry sectors that may give rise to environmental and social risks. For further information and an overview of processes and existing sector policies please refer to the [framework](#).

## Human Rights engagement tool

In 2018 we started the development of our Human Rights Engagement Tool with the aim of understanding and manage our Human rights impacts and to give a strategic view of how ING can act on portfolio data. Knowing which clients to prioritise engagement with and how to systematically approach a programme for proactive engagement was a challenging task.

Incorporating data from several external data providers means that we gather information on actual impacts, prioritising where we should focus our efforts on engagement and understanding how our clients are managing their human rights risks not only in their own operations but also in their supply chain.

When we started the first engagement exercise, the ESR Framework was already embedded in our business and we had just defined the three salient human rights issues in our lending portfolio (forced labour, child labour and land-related community

issues). Knowing where to prioritise our efforts and understand how our clients were managing their human rights issues enabled us to shift the perception of the clients in scope and present in a new way, demonstrating that financial capital is not the only capital that is important to us.

Clients expressed appreciation for our efforts in taking the topic of human rights forward. Both sides often saw further opportunities for future engagement through follow-up advice and shared learning.

## Timeline showing development of our Human Rights Engagement Tool

### 2018-2019

#### First proactive engagement exercise, focused on open dialogue

The client selection methodology was disclosed in the 2019 human rights update. The exercise focused on understanding, and engaging in open dialogue with, selected clients; the agenda included ING's human rights salient issues. We interacted with 29 clients in different sectors and geographies who were high-risk in terms of their (potential) connection to human rights issues. Clients were selected using social risk data from Sustainalytics (an environmental, social and governance data provider for financial institutions) and focused on sectors with a high risk of human rights impacts.

We learned from this exercise that clients were open to discussing their human rights issues. They were also keen to expand their knowledge on best practices through their engagement with the bank, since we play a role in financing multiple actors in their sector and value chain that could be challenged by the same issues.

The exercise broadened our insights into the client, enabling a better client assessment. In certain cases it also created a new channel of communication, since we engaged with departments outside our regular point of contact (e.g. the Chief Finance Office), such as Strategy, Sustainability and Communications.

### 2019-2020

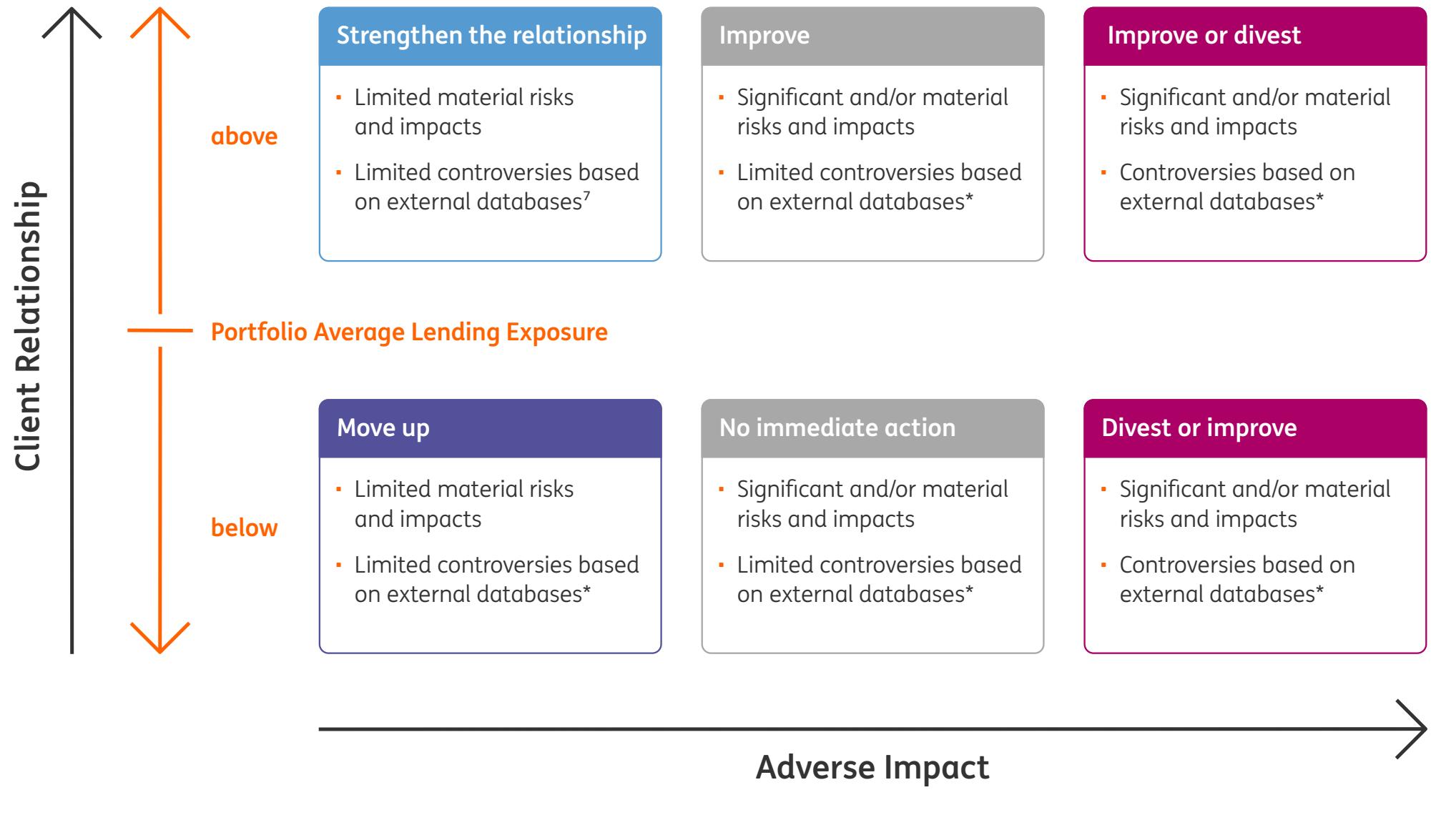
#### Revaluation of methodology, disclosed in the 2019 Human Rights update

Using lessons learned from the first exercise, we reevaluated our methodology in order to improve meaningful engagement with clients on human rights; we also reevaluated the way we select clients. To expand specific knowledge of human rights risks, we added new data points to the methodology:

- Average exposure from our corporate lending portfolio.
- Three external databases:
  - Business and Human Rights Resource Centre claims;
  - Sustainalytics ESG Risk Rating scores and controversies;
  - RepRisk Scores focused on ING's human rights saliences in wholesale banking.

This resulted in a new model, dividing clients into four engagement prioritisation blocks. This new model was presented to external stakeholders, including members of civil society organisations for discussion, and we took their feedback into consideration when expanding the model.

**Figure 2 Human Rights Client Engagement Tool Methodology**



<sup>7</sup> Databases used: Sustainalytics, RepRisk and Business and Human Rights Resource Centre.

## 2020

### Human Rights Engagement model, disclosed in the 2020 Human Rights update

This model was expanded to provide more granularity in the different risk profiles, adding two new engagement prioritisation blocks to the initial model. Using the same data points, the current format of the tool is shown on the left side of the page.

In 2020, we tested the methodology with different business lines and gathered their feedback to enhance the tool and continue with its development.

## Gaining momentum and further improvements

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. This information would expand the data points of the tool and assist in understanding ING's potential financial exposure to human rights issues per industry and on a country level. In addition, the tool could be improved by adding other environmental and governance topics added to it.

As the complexity of the tool increased, we assigned a dedicated team within ING Analytics to further manage and enhance the tool.

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, in preparation of client meetings for example, or to support portfolio management and strategic thinking.

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. The survey also showed that client relationship managers often struggle to compare and interpret different ESG data. The impact of not having the right ESG information available can lead to missed client opportunities, and hidden risks being managed too late or not at all.

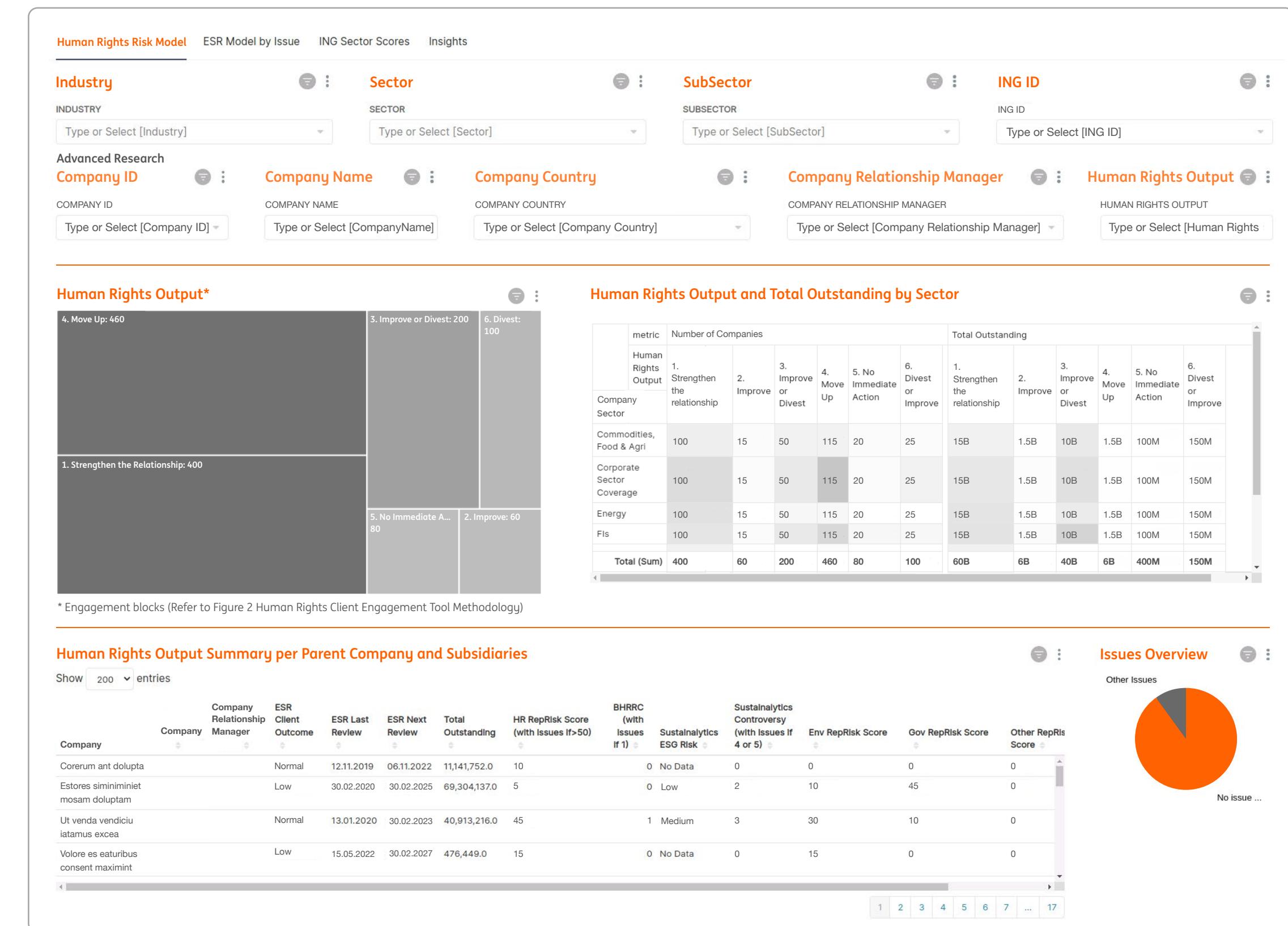


For us at ING Analytics, human rights and ESG is a large innovation space for putting data science to good use; from entity matching to harmonising internal and external data sources, we ultimately want to empower the users of our solutions, our ING colleagues, to create sustainable impact for our clients."

– Raluca Voinea,  
Product Manager, ING Analytics

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. The dashboard also shows in which of the six engagement blocks (Figure 2) the client is positioned.

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.



Data in the dashboard was redacted for illustration purposes and does not reflect real numbers.

## Engagement testing

In addition to the work carried out by ING Analytics, the ESR team conducted tests to check whether or not the tool was able to correctly categorise clients per engagement block, based on internal and external data indicators. A sample of eight clients was selected for further detailed evaluation. The selection of clients had the following rationale:

- Clients in the tool's 'Improve or Divest' engagement block 3;
- Clients active in sectors most likely to be exposed to human rights issues (Metals and Mining, Food and Agriculture);
- In addition, clients that were part of the first round of the client engagement exercise, were included in this new selection to understand how they progressed in their human rights commitments since the last engagement exercises carried out in 2018 and 2019.

The engagement testing is still underway; we aim to include our findings in the next human rights report. Meanwhile, we are assessing the outcomes of the engagements carried out to analyse how to monitor and use the data effectively.

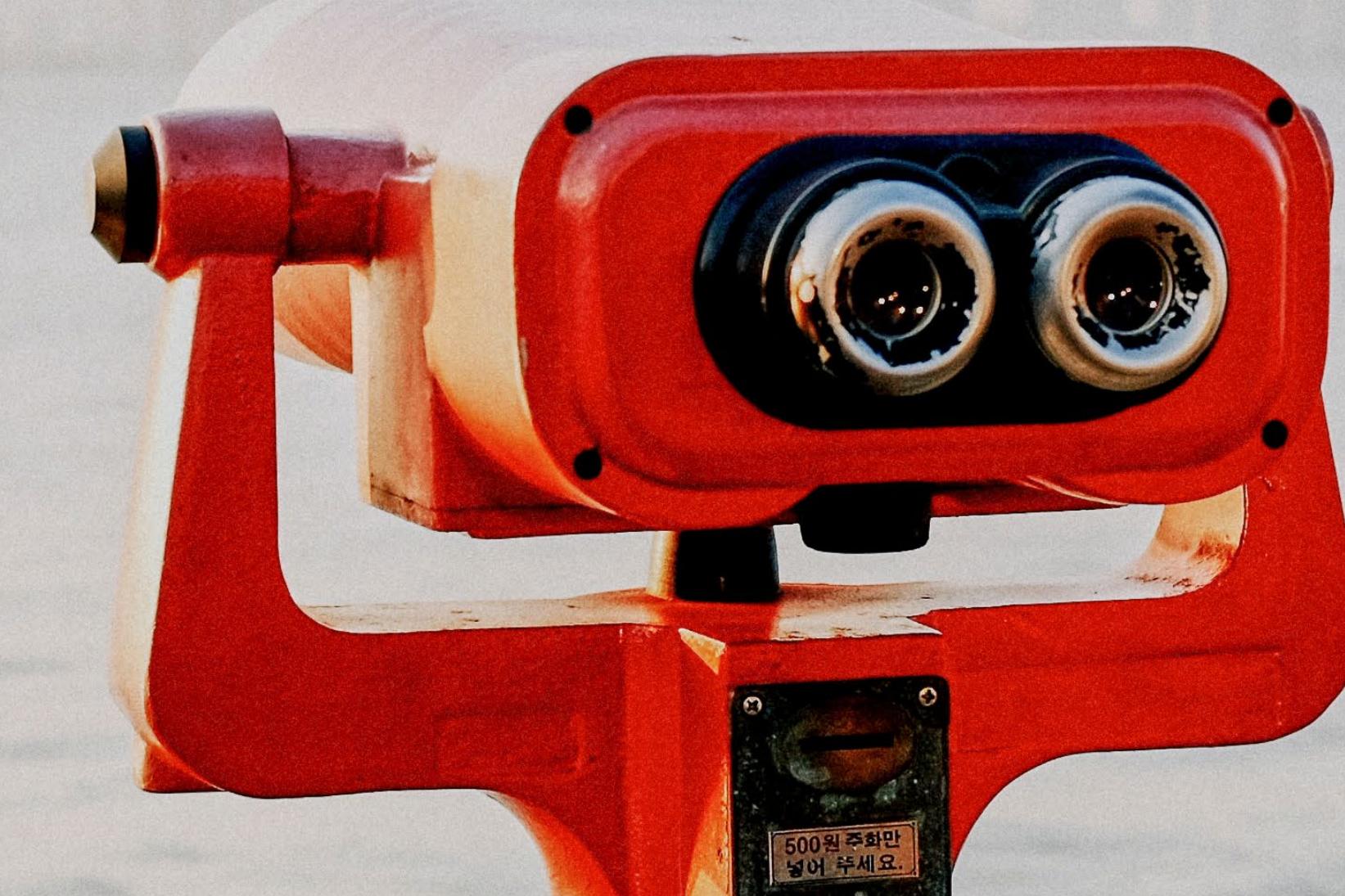
## Research trip to the Democratic Republic of Congo (DRC)

In May 2022, ING representatives from our ESR team and sector specific specialists, visited several mining sites in the DRC to understand how clients are managing potential environmental, social and human rights risks in their operations. Artisanal and small-scale mining (ASM) are present in the DRC and are considered a lawful practice in designated areas of the country.

The DRC currently produces more than 70% of the world's cobalt and is the world's fourth largest producer of copper. Although we do not restrict engagement in financing of cobalt mining in our policy framework, we currently do not provide any project-related finance (to any client) for cobalt mining in the DRC. Moreover, we rule out the financing of artisanal and small-scale mining (ASM) globally due to concerns on unsafe working conditions and potential exposure to forced labour and child labour.

This trip was not linked to any project finance or specific financing in the DRC, but it was important to us as we anticipate future lending requests given the increasing demand for copper and cobalt for use in battery storage supporting the energy transition. Our research trip to the DRC was a first step in that direction, giving us a first-hand view of living conditions, working conditions and the social impacts related to both large-scale and artisanal mining, and to understand how human rights risks are managed.

# The road ahead



# The road ahead

The past couple of years have shown us how hard it is to predict the year ahead, but what is certain is that our efforts to embed respect for human rights in all our operations will continue.

## In the next year:

- We aim to work on the publication of a comprehensive human rights report, using the UNGP Reporting Framework, continuing to use Part C of the Framework on salient issues and looking forward to clearer outcomes and reflections.
- We will work on a white paper on the EC's Just Transition Mechanism. Human rights and climate change are inherently connected. Climate change can negatively impact human rights, in particular the right to health, food and shelter. So too can the global response to it, most notably the energy transition strategy. Consequently, we recognise the importance of a just transition that ensures that combating climate change and protecting the environment is done in a socially inclusive manner.
- ING will continue its participation in Shift's<sup>8</sup> Business Learning Program, which supports companies that want to strengthen their human rights approach. We will also remain a member of Shift's Financial Institution Practitioners Circle, established to discuss and share how participants meet their responsibility to respect human rights.



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“Putting sustainability at the heart of what we do, recognises that we have a responsibility to society to define new ways of doing business that align economic growth with positive social and environmental impact. We strive to live up to this responsibility because we believe it is the right thing to do.

ING’s human rights journey has over 20 years of history and there is much more to come in our road ahead. We look forward to continuing our proactive application of the UNGPs through our governance and policies, exercising our leverage through client dialogue and bringing value-chains together.”

– Anne-Sophie Castelnau,  
ING’s global head of Sustainability

<sup>8</sup> Centre of expertise on the UN Guiding Principles on Business and Human Rights

- We will continue our saliency exercise in ING's retail business, validating our saliences via a session with internal and external stakeholders.
- ING will further develop our Human Rights Engagement Tool, and explore its implementation in our existing way of working as well as expansion to other environmental and governance topics.
- We will continue our participation in the European Banking Federation's Social Taxonomy working group.
- In order to better equip and empower different parts of the business to identify potential heightened risk of impacts on people associated with ING's products and services, ING commissioned Shift to deliver a training to front office teams to increase awareness of the UNGPs and related good practice in the banking sector.

These are just a few of our plans for the coming year. However, as circumstances change and evolve, so may our priorities as we adapt to these changes. We aim to continuously learn and improve from our experience. The road ahead is continuous and we look forward to further enhancing our progress.

### **Research study: Investigating historical links with slavery**

At ING, we do not tolerate discrimination or exploitation. We strive to create a safe and tolerant company for our customers, suppliers, employees and the communities in which we operate.

ING's Dutch legal predecessors were all established after the abolition of slavery, which includes Rijkspostspaarbank in 1881, Postcheque- en Girodienst in 1918 and NMB in 1927. In addition, ING has made several acquisitions over the years, including the British bank Barings in 1995.

The Baring Archive, owned by ING and incorporated as a charitable trust in 2008, preserves and manages the archives that document the history of the financial sector dating back to 1762 and promotes their use for educational purposes.

At the request of ING in the UK, the University of Leeds is hosting a PhD scholarship, starting in the autumn of 2022, focusing on the role of the City of London and particularly Baring Brothers in financing slavery in the 18th and early part of the 19th centuries.

# Appendix

## The UN Guiding Principles Reporting Framework Index

A – Governance of Respect for Human Rights	Pages where addressed
<b>A1 Policy commitment</b>	
What does the company say publicly about its commitment to respect human rights?	<a href="#">5</a>
A1.1 How has the public commitment been developed?	<a href="#">5</a>
A1.2 Whose human rights does the public commitment address?	<a href="#">5</a>
A1.3 How is the public commitment disseminated?	<a href="#">5</a>
<b>A2 Embedding respect for human rights</b>	
How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?	<a href="#">5</a>
A2.1 How is day-to-day responsibility for human rights performance organized within the company, and why?	
A2.2 What kinds of human rights issues are discussed by senior management and by the Board, and why?	
A2.3 How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?	<a href="#">21-22</a>
A2.4 How does the company make clear in its business relationships the importance it places on respect for human rights?	<a href="#">32; 45-48</a>
A2.5 What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	

B – Defining the focus of the reporting	Pages where addressed
<b>B1 Statement of salient issues</b> State the salient issues associated with the company's activities and business relationships during the reporting period	<a href="#">11; 31; 45</a>
<b>B2 Explanation of salient issues</b> Describe how the salient issues were determined, including any input from stakeholders	<a href="#">11-20</a>
<b>B3 Geographical focus (if any)</b> If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made	<a href="#">11</a>
<b>B4 Additional severe impacts (if any)</b> Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues, and explain how they have been addressed	<a href="#">20</a>
C – Management of Salient Human Rights Issues	Pages where addressed
<b>C1 Specific policies</b> Does the company have any specific policies that address its salient human rights issues and, if so, what are they?	<a href="#">21-22; 33</a>
<b>C1.1</b> How does the company make clear the relevance and significance of such policies to those who need to implement them?	
<b>C2 Stakeholder engagement</b> What is the company's approach to engagement with stakeholders in relation to each salient human rights issue?	<a href="#">22</a>
<b>C2.1</b> How does the company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so?	
<b>C2.2</b> During the reporting period, which stakeholders has the company engaged with regarding each salient issue, and why?	
<b>C2.3</b> During the reporting period, how have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?	
<b>C3 Assessing impacts</b> How does the company identify any changes in the nature of each salient human rights issue over time?	<a href="#">22-23</a>
<b>C3.1</b> During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?	<a href="#">42-43</a>
<b>C3.2</b> During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?	

**C – Management of Salient Human Rights Issues (continued)****Pages where addressed**

<b>C4 Integrating findings and taking action</b>	How does the company integrate its findings about each salient human rights issue into its decision-making processes and actions?	<a href="#">24-25</a>
	<b>C4.1</b> How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions?	<a href="#">24; 27</a>
	<b>C4.2</b> When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?	
	<b>C4.3</b> During the reporting period, what action has the company taken to prevent or mitigate potential impacts related to each salient issue?	<a href="#">14-16; 18; 20; 24-25;</a> <a href="#">33-41; 45-46</a>
<b>C5 Tracking performance</b>	How does the company know if its efforts to address each salient human rights issue are effective in practice?	<a href="#">22-23; 42-43</a>
	<b>C5.1</b> What specific examples from the reporting period illustrate whether each salient issue is being managed effectively?	
<b>C6 Remediation</b>	How does the company enable effective remedy if people are harmed by its actions or decisions in relation to a salient human rights issue?	<a href="#">26-29; 42-43</a>
	<b>C6.1</b> Through what means can the company receive complaints or concerns related to each salient issue?	<a href="#">26; 33</a>
	<b>C6.2</b> How does the company know if people feel able and empowered to raise complaints or concerns?	<a href="#">29</a>
	<b>C6.3</b> How does the company process complaints and assess the effectiveness of outcomes?	<a href="#">26-28</a>
	<b>C6.4</b> During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?	<a href="#">42-43</a>
	<b>C6.5</b> During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples?	<a href="#">16; 25</a>

# Contact

The use of all data provided in this report is restricted to ING Group and its subsidiaries, unless stated otherwise. Additional information about ING can be found on its website. If you would like to provide feedback on this report or find out more about ING's stance on human rights, please visit our sustainability page at [Sustainability | ING](#) or contact:

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