

ESG STATEMENT ING BANK N.V.

EXPLANATION OF HOW ESG FACTORS ARE REFLECTED IN THE BENCHMARK STATEMENT	
Consideration of ESG factors	
1. Name of the benchmark administrator	ING Bank N.V.
2. Type of benchmark	Family of Equity benchmarks
3. Name of the benchmark or family of benchmarks	The name and details of the benchmarks administrated by ING: Benchmark Administration • ING (ingwb.com)
4. Are there in the portfolio of the benchmark administrator any EU Climate Transition Benchmarks, EU Paris-aligned Benchmarks, benchmarks that pursue ESG objectives or benchmarks that take into account ESG factors?	Yes, for ING’s Sustainable Europe Low Risk Equity Index and ING’s Sustainable Europe Low Risk Equity Net Total Return Index ESG factors are taken into account and ESG objectives are pursued. For the other 8 benchmarks, ESG factors are not taken into account, nor do these pursue ESG objectives.
5. Does the benchmark or family of benchmarks pursue ESG objectives?	Yes, cf. above under 4.
6. Where the response to Item 5 is positive, provide below the details (score) in relation to the ESG factors listed in Annex II for each family of benchmarks at aggregated level. The ESG factors shall be disclosed at an aggregated weighted average value at the level of the family of benchmarks.	For the purposes of Article 27(2a) of the EU BMR, as amended by Regulation (EU) 2019/2089 of the European Parliament and of the Council of 27 November 2019 (the “Low Carbon Benchmark Regulation”) no ING Benchmark pursues environmental, social and governance (“ESG”) objectives except those ING Benchmarks expressly identified in the Benchmark Statement. Item 7 has been completed with respect of the benchmark listed in item 4.

7. Where the response to Item 5 is positive, provide below the details (score) for each benchmark, in relation to the ESG factors listed in Annex II, depending on the relevant underlying asset concerned. Alternatively, all of this information may be provided in the form of a hyperlink to a website of the benchmark administrator included in the benchmark statement. The information on the website shall be easily available and accessible. Benchmark administrators shall ensure that information published on their website remains available for five years. The score of the ESG factors shall not be disclosed for each constituent of the benchmark, but shall be disclosed at an aggregated weighted average value of the benchmark.

a. List of combined ESG factors:

Weighted average ESG rating of the benchmark (voluntary)
 Overall ESG rating of top ten benchmark constituents by weighting in the benchmark (voluntary)

b. List of environmental factors:

Weighted average environmental rating of the benchmark (voluntary)
 Exposure of the benchmark portfolio to renewable energy as measured by capital expenditures (CapEx) in those activities (as a share of total CapEx by energy companies included in the portfolio) (voluntary)
Exposure of the benchmark portfolio to climate-related physical risks, measuring the effects of extreme weather events on companies' operations and production or on the different stages of the supply chain (based on issuer exposure) (voluntary)
Degree of exposure of the portfolio to the sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006 of the European Parliament and of the Council(1) as a percentage of the total weight in the portfolio¹
Greenhouse gas (GHG) intensity of the benchmark
Percentage of GHG emissions reported versus estimated
Exposure of the benchmark portfolio to companies the activities of which fall under Divisions 05 to 09, 19 and 20 of Annex I to Regulation (EC) No 1893/2006
Exposure of the benchmark portfolio to activities included in the environmental goods and services sector, as defined in Article 2, point (5) of Regulation (EU) No 691/2011 of the European Parliament and of the Council

- **Section C: 30%**
 - **Section D: 10%**
 - **Section E: 6,67%**
 - **Section G: 6,67%**
- 150,53 (100%)**
76,67%
0,00%

This data is not yet available.

c. List of social factors:

Weighted average social rating of the benchmark (voluntary)
 International treaties and conventions, United Nations principles or, where applicable, national law used in order to determine what constitutes a 'controversial weapon'
Weighted average percentage of benchmark constituents in the controversial weapons sector
Weighted average percentage of benchmark constituents in the tobacco sector
Number of benchmark constituents subject to social violations (absolute number and relative divided by all benchmark constituents), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law

Cluster weapons, anti-personnel mines, biological and chemical weapons, white phosphorus, weapons containing depleted uranium and nuclear weapons are controversial weapons.

- 0,00%**
0,00%
- **Absolute number: 0**
 - **Relative number: 0,00%**

¹ For the sections not mentioned here, the degree of exposure is 0%.

Exposure of the benchmark portfolio to companies without due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	0,00%
Weighted average gender pay gap Weighted average ratio of female to male board members	5,53% No data available.
Weighted average ratio of accidents, injuries, fatalities	0,295
Numbers of convictions and amount of fines for violations of anti-corruption and anti-bribery laws	0
<p>d. List of governance factors:</p> <hr/> Weighted average governance rating of the benchmark (voluntary). <hr/> Weighted average percentage of board members who are independent <hr/> Weighted average percentage of female board members	70,03% No data available.
8. Data and standards used	
<p>a. Description of data sources used to provide information on the ESG factors in the benchmark statement. <i>Describe how the data used to provide information on the ESG factors in the benchmark statement are sourced and whether, and to what extent, data are estimated or reported.</i></p> <p>b. Reference standards. <i>List the supporting standards used for the reporting under item 6 and/or item 7.</i></p>	<p>The ESG data is provided by ING’s ESG agent Sustainalytics. Sustainalytics is a specialized ESG data provider.</p> <p>ESG Scores from Sustainalytics are designed to transparently and objectively measure a company’s relative ESG performance, commitment and effectiveness across several themes based on publicly-reported data. Information is collected by the Sustainalytics’ ESG specialists based on publicly available sources such as company websites, annual reports, and corporate social responsibility reports or contributed by firms and then audited and standardized. More information on Sustainalytics’ methodology and its standards can be located on their website: https://www.sustainalytics.com.</p> <p>For the ING Benchmarks as referred to under item 4, Sustainalytics provides the Sustainable Pool of shares. The Sustainable Pool consists of shares of companies that are incorporated in developed Europe and shares that are listed in developed Europe. Developed Europe refers to: France, Germany,</p>

	<p>Austria, Belgium, Luxembourg, Netherlands, Switzerland, Italy, Spain, Portugal, UK, Ireland, Denmark, Sweden, Finland, Norway, Greece.</p> <p>Per sector, companies which are in the top 50 per cent in terms of ESG score are selected. The relative performance is determined based on the companies that are covered by Sustainalytics.</p> <p>Sustainalytics has developed a process that identifies companies involved in some of the most severe ESG incidents by applying criteria that are derived from the UN Global Compact’s ten principles (human right, labour, environment, anti-corruption), and its underlying conventions and treaties. Companies are assessed as either ‘compliant’ or ‘non-compliant’. Non-compliant companies are excluded.</p>
<p>SECTION 2 – ADDITIONAL DISCLOSURE REQUIREMENTS FOR EU CLIMATE TRANSITION AND EU PARIS-ALIGNED BENCHMARKS</p>	<p>Not applicable. The ING Benchmarks are not labelled as ‘EU Climate Transition Benchmark’ or ‘EU Paris-aligned Benchmark’.</p>
<p>SECTION 3 – DISCLOSURE OF THE ALIGNMENT WITH THE OBJECTIVES OF THE PARIS AGREEMENT</p>	<p>Not applicable. The ING Benchmarks are not significant equity or bond benchmarks, EU Climate Transition Benchmarks or EU Paris-aligned Benchmarks.</p>
<p>Date on which information has last been updated and reason for the update:</p>	<p>25 January 2022, to include further data on scoring of benchmark in relation to ESG factors mentioned in Annex II.</p>