

ING Wholesale Banking

Summary of Best Execution and Order Handling Policy - MiFID

1. When do we apply best execution to our retail clients?

This summary of our Best Execution and Order Handling Policy (the Policy) outlines the manner in which we obtain the best possible result for our retail clients when executing their transactions in financial instruments in accordance with the revised Markets in Financial Instruments Directive (hereafter: MiFID). This Policy applies amongst others where ING Wholesale Banking¹ ('we' 'us' or 'our' as appropriate) accept an order from a retail client to execute or transmit an order on his behalf. When executing your order we will take all sufficient steps to obtain the best possible result for you based on the criteria set out below.

2. What is best execution?

Best execution is how we ensure that we take all sufficient steps to obtain the best possible result for you when executing your order. In determining how we will achieve best execution for your order we will take into account the following factors:

- price
- costs
- speed
- likelihood of execution and settlement
- size and nature of the order, and
- any other consideration relevant to the efficient execution of your order.

3. How do we determine the relative importance of the execution factors for our clients?

When executing orders on behalf of clients, we determine best execution on the basis of the above-mentioned factors, our commercial experience, the characteristics of the client order, the financial instrument and the execution venue on which your order will be executed.

4. How do we provide best execution to our retail clients?

For a client classified as "retail" under MiFID we determine the best possible result in terms of total consideration. Total consideration means that the price and costs of execution will determine best execution. However, the other factors above

may take priority where instrumental in achieving the best possible result in terms of total consideration.

5. How do we select an execution venue for the execution of your order?

While selecting execution venues that we deem appropriate for the execution of client orders we take the following venue selection factors and considerations into account:

- quality of liquidity available for the financial instrument concerned;
- quality of execution (including, price, cost and speed);
- quality of the operator of the execution venue;
- quality of the execution venue (including, reliability, continuity of trading and creditworthiness);
- quality of any related clearing and settlement facilities; and
- any other factor which might be relevant to achieve best execution.

Based on the application of the venue selection factors, we shall select the most appropriate venue to execute your order.

6. Execution methods

We may execute or transmit your order on or to a trading venue (i.e. a regulated market (RM), multilateral trading facility (MTF) or organised trading facility (OTF)) or outside a trading venue (e.g. by dealing against our own book or against the book of another broker or investment firm). We note that your order can only be executed outside a trading venue if you have given your prior express consent by completing the off-exchange trading consent form.

Please note, that we are subject to the mandatory trading obligation for shares. These requirements may limit the execution venues we may use while executing retail client orders in shares. For example, where we receive an order from the client to buy shares we might not be able to execute this order OTC even though executing the shares off-exchange will result in the best possible result in terms of total consideration.

¹ For purposes of the ING Wholesale Banking Best Execution and Order Handling Policy, the name ING Wholesale Banking is intended, particularly, to include ING Wholesale Banking Financial Markets. ING Wholesale Banking is a trading name of ING Bank N.V. and its branches and subsidiaries.

7. Specific situations

In specific circumstances, best execution might be reached differently or might be based on other decisive factors than price and costs. For retail clients the following examples can be distinguished:

a. Single venue transactions

Where the order given by you relates by definition or by nature to a single execution venue, this may result in the most relevant factor to be speed of execution when executing your orders.

b. Specific instructions

Where you give us specific instructions (such as specifying the characteristics of a bespoke product), either relating to an order or a particular aspect of an order we will execute your order in accordance with your instructions. In such instances, we will be deemed to have provided you with best execution, even if your instructions prevented us from following the procedures we have designed to obtain the best possible result for you when executing your order.

8. How can retail clients assess whether we provided them with best execution?

Each quarter we will publish reports with the most recent execution quality data received from execution venues which we have used for the execution of your orders. In these quarterly reports you can, amongst others, find data regarding price, costs and likelihood of execution for each financial instrument per execution venue. With this data you will be able to assess the quality of execution provided by these execution venues. The first set of quarterly reports will be published mid-2018 and will be accessible for all our (potential) clients. The reports can be accessed via www.ingwb.com/mifid. Upon reasonable request, we will demonstrate that we have executed your order in accordance with the Policy.

9. What execution venues are used by ING Wholesale Banking?

For an overview of all execution venues we use for the execution of your orders we refer to Annex II of the Policy which is available on www.ingwb.com/mifid.

10. Inducements and (non)-monetary benefits

With respect to transmitting or executing your order, we note that we have taken measures not to structure our charges and commissions in such a way so as to discriminate unfairly between execution venues. We also do not receive any remuneration, discounts or non-monetary benefits for transmitting your order to a particular execution venue which would infringe the MiFID requirements with respect to conflict of interest or inducements. For more information about inducements we refer to our inducement policy which is available on www.ingwb.com/mifid.

11. Monitoring and review

We will review the Policy at least annually or whenever a material change occurs which might affect our ability to continuously obtain the best possible result for you.