

2017 Gender Pay Report, ING UK

Committed to a diverse and inclusive workplace

Under new legislation that came into force in the UK in April 2017, UK employers with more than 250 employees are required to publish their gender pay gap.

Across ING's international network, we promote diversity (including gender diversity) not just because it is the right thing to do but because we can't deliver on our strategy without it. As part of this, we introduced a diversity manifesto, called Success through difference, in January 2016 that applies to all employees worldwide. This official bank policy sets out what diversity means at ING, why it is important, and what employees and managers can do. ING was one of 52 firms recognised in the 2017 Bloomberg Financial Services Gender-Equality Index (BFGEI), the second year we have been included in the listing.

With in the UK specifically, we have been focussing on building the pipeline of female talent for several years. Our Diversity and Inclusion Forum UK was formed in 2012, focussing on improving diversity-related policies and opening up professional development opportunities. With the support of senior management and HR, the region has driven the agenda on:

- Recruitment and promotion: We have had at least one female managing director on all promotion panels since 2015 and aim to hire 50% female trainees in the International Talent Programme each year.
- Training and events: This includes career coaching for nominated women, all staff training on reducing unconscious bias, mentoring, panel discussions, and lunch and learns.
- Maternity and paternity: This includes maternity coaching for parents to be and managers, enhanced maternity benefits and shared parental leave compared to government statutory, and improved information about childcare initiatives.

In our 2017 promotion round, more women were promoted to the corporate title Director than men, and in 2018 an equal number of men and women are being promoted with these decisions entirely based on the merit of the candidates. In the five years since 2012, the proportion of Directors in the UK team that are women grew from 23.5% to 29%. Increased numbers of senior women will help close our gender pay gap.

We know that there is still a significant amount of progress to be made and the rate of change is too slow. We are also aware that changes within our UK business mean that next year our gender pay gap is likely to widen further. A significant factor for this is the consolidation of ING's European trading function in Financial Markets in London in 2017-18. Financial Markets is an area where we have one of the biggest gender gaps in our industry. However we are committed to continuing to grow our pipeline of diverse talents and to continue to provide an inclusive workplace.



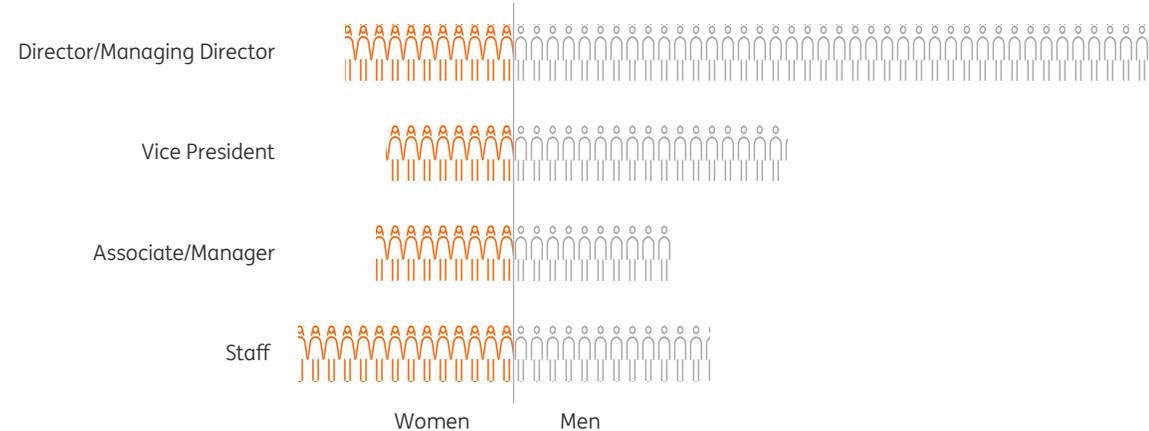
Ronald Visser
Head of Human Resources UK, Ireland and Middle East
ING Wholesale Banking

Corporate title pay gap gives a clearer view

As pay is typically linked to corporate title, our gender pay gap is partly driven by the larger numbers of men than women in senior roles (particularly at Director and Managing Director level). To get a clearer view, we have analysed the pay gap by corporate title and also whether the role is in the front office or back office. Front office roles are typically in lending, financial markets and corporate clients, while back office roles tend to be in support, such as HR, Legal or Corporate Communications.

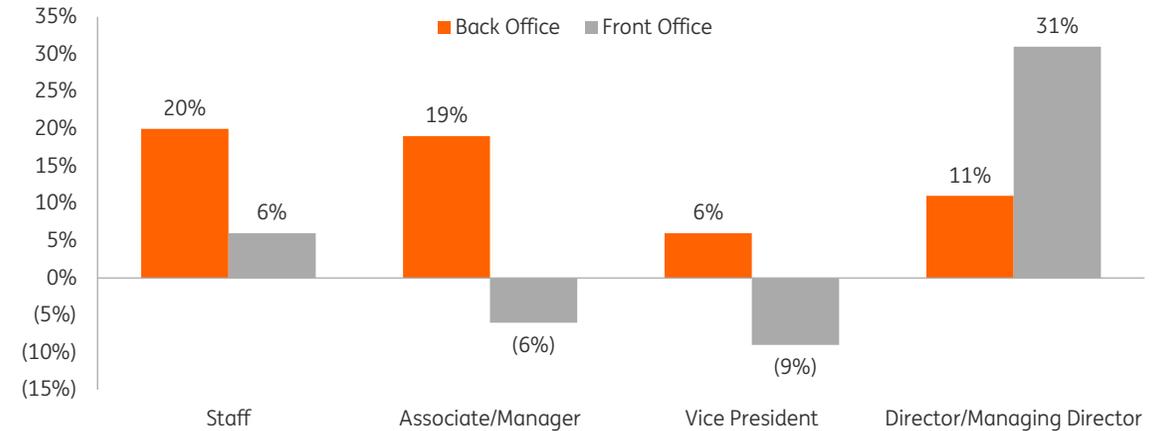
These figures suggest a gender pay gap of 31% for front office Director/Managing Directors (using the median). At the other end of pay gap scale, it suggests a “negative pay gap” (women have higher pay on average) for back office Director/Managing Directors of 2%.

Breakdown of Corporate Title by gender

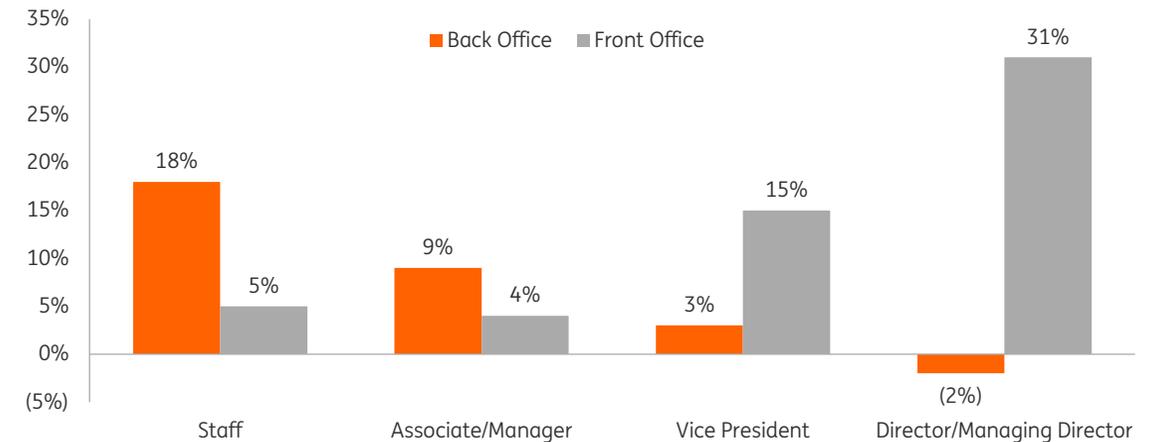


Note: 5 staff per icon

Mean Pay Gap by Corporate Title (salary only)



Median Pay Gap by Corporate Title (salary only)



Routes to success: Orange Code & Diversity Manifesto

Orange code

The Orange Code is a manifesto that describes our way of working. It is comprised of ING Values and the ING Behaviours. The Orange Code is made up of two parts:

ING Values - the non-negotiable promises we make to the world. The principles we stick to, no matter what.

We are honest.
We are prudent.
We are responsible.

ING Behaviours - our way of being that makes us different from the rest. The commitments we make to each other and the standards by which we will measure each other's performance.

You take it on and make it happen.
You help others to be successful.
You are always a step ahead.



the orange code

Women in Banking & Finance (WIBF)

We pay an annual membership fee for all employees who wish to be members of the WIBF and host a number of the forums events internally in our offices. All new joiners in the company, whether they be male or female, are invited and advised to join the forum.

Success through difference

A diversity manifesto, **Success through difference**, was introduced in January 2016 which applies to all employees worldwide. It explains what diversity means to ING, why it is important, and what employees can all do to promote diversity.

At ING, the term diversity refers to differences of all kinds. By this we mean, differences in age, gender, race, background, physical abilities, sexual orientation and religious beliefs

Diversity increases our pool of potential candidates. It helps us attract and retain the best and brightest talent.



Focus on career development programmes



Promotions Panel

The ING UK promotion panel assesses if candidates meet the competencies for promotion. Since 2016, we have had at least one female managing director on all promotion panels.

Managing Director, Emma Badman, Head of Compliance UK, Ireland and Middle East and member of the UK Management Committee said: "Our promotion decisions are always made based on merit irrespective of the gender of the candidate. Sitting on the panel gives me the opportunity to support and guide the next generation of talent, which I find to be a very rewarding part of my job."



Career Coaching

Career coaching aims to foster strength and depth of talent in our workforce that reflects the diverse world we live in. In 2016, 10 women participated in a six-month career coaching programme for female talent, with the majority gaining promotion the following year.

Director Naomi Kirwan, Financial Markets in Global Securities Finance (GSF) Sales said: "Since joining ING just over two years ago I have had many opportunities to grow my career. This includes developing my role to market GSF across Europe, as well as training and coaching to further build my management skills. In my promotion panel interview, I was able to pitch this and being promoted to Director feels like an acknowledgement of this work."



Maternity Coaching

Since 2015 ING UK has offered maternity coaching which gives colleagues an opportunity to explore change, what they can do to make it easier, help them effectively manage business issues and stay feeling connected through a very important time in their life. The coaching is now available to those who go on paternity and shared parental leave also.

Director, Alison Beech, HR Information Technology UK said: "My maternity coach was able to support me through a successful promotion whilst pregnant and helped me to transition smoothly and confidently back into my management position after my extended maternity leave. I really appreciated having an external support who was flexible enough to tailor their coaching specifically to tackle the issues that were important to me."



Diversity & Inclusion Forum UK

The Diversity and Inclusion Forum UK is an eight-member group of women and men focussing on improving diversity-related policies and professional development opportunities at ING in the UK. The forum was established in 2012.

Director and Diversity and Inclusion Forum UK chair, Martha McKenzie-Minifie said: "It is hugely rewarding to be part of a forum that helps ING to accelerate the pipeline of female talent, support diverse teams and foster an inclusive workplace. We know that these challenges are not unique to our firm and there is not a quick fix. However, I truly believe we are committed to positive change and working together we will make it happen."



Unconscious Bias Training

Unconscious bias training was rolled out at ING UK in 2014 amongst senior managers, and due to its success has now been rolled out to all employees. The training was introduced to make managers understand the impact their unconscious bias has on the decisions they made within their teams.

Managing Director, Global Head of Loan Sales, Kim Bailes said: "Knowing our biases is key to fostering a more inclusive culture to ensure we have equality of opportunities and treatment. Within ING, the UK was the first to adopt a holistic approach to unconscious bias that embraced senior management, line managers and team members to challenge ourselves to not only know but to consciously challenge those biases. This was certainly the greatest impact on my inclusive behaviours."



RING Network

RING UK is an internal ING network open to all but primarily targets employees at Director level and below. RING UK creates a platform for junior employees to meet senior leaders to share ideas and use each other as a sounding board. The aim is to aid career development and assist juniors in growing their networks across ING.

HR Officer, Marija Sapkauskaitė, HR said: "As a member of the RING network, it has given me the opportunity to build relationships with colleagues across the bank irrespective of position and location. In a bank that champions collaboration – the RING network is an enabler for all of the diverse members to come together to build a stronger understanding of the business and their opportunities within it."

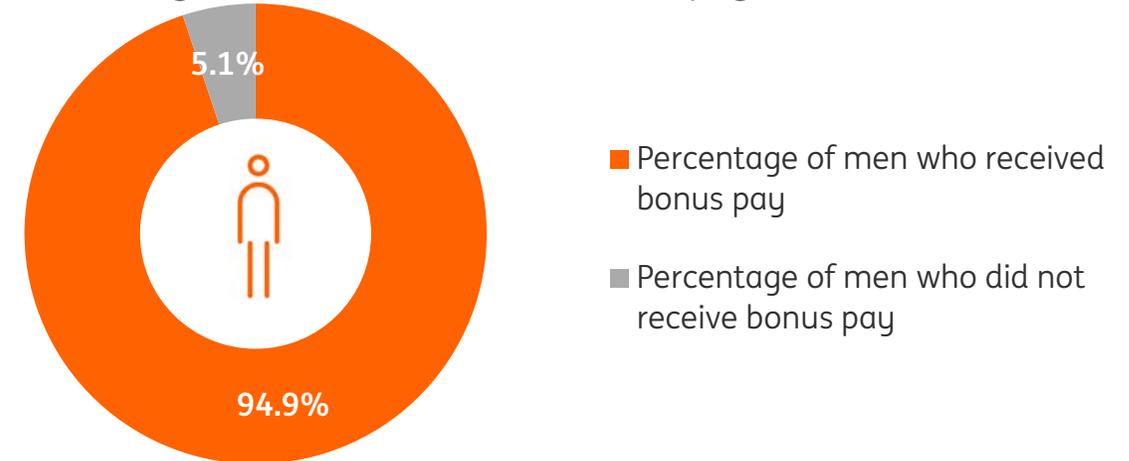
Statutory reporting

Under the government requirement we are required to report our gender pay gap data for ING UK.

Proportion of men and women in each quartile band

	Men	Women
Upper	87.1%	12.9%
Upper middle	69.6%	30.4%
Lower middle	66.9%	33.1%
Lower	42.6%	57.4%

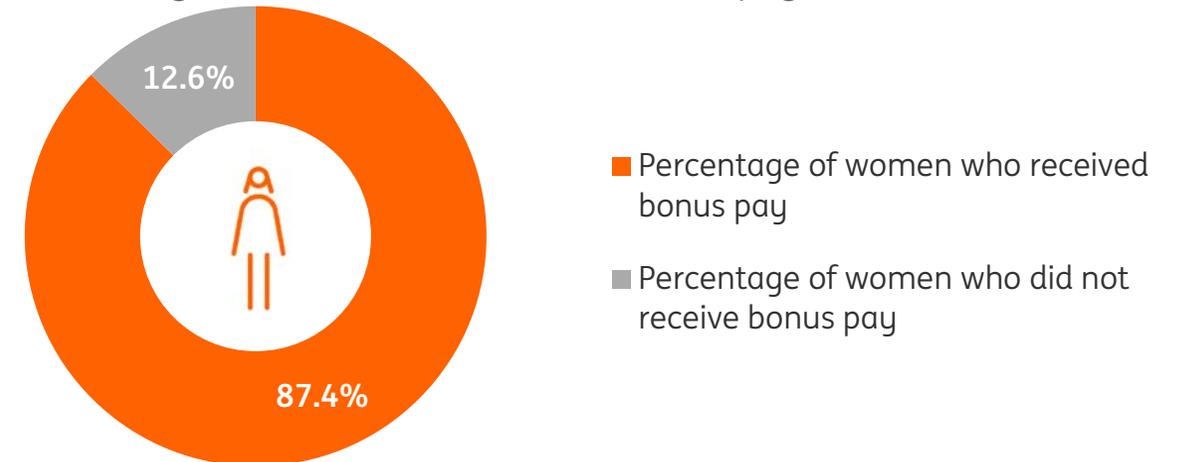
Percentage of men who received bonus pay



ING UK overall gender pay gap

	Median	Mean
Gender pay gap	48.0%	43.2%
Gender bonus pay gap	70.3%	63.4%

Percentage of women who received bonus pay



DECLARATION

I confirm that ING UK's gender pay gap calculations are accurate and meet the requirements of the Regulations. The calculations and data contained in this report have been fully validated and abides by the methodology provided in The Equality Act 2010 (Gender Pay Gap information) Regulation 2017.

Ronald Visser
Head Human Resources UK, Ireland and Middle East