

Goal of the document

Our data management system

In 2013 we updated our environmental management tool to increase the reliability and accuracy of publicly reported data on various aspects of our sustainability performance. The updated tool reflects changes in our organization and the increased maturity of environmental reporting since 2009, when the first platform was custom built for our use. 2013 will be considered as the new set of data. When there are significant organizational changes, the baseline will be changed to keep comparing the same amounts with each other on total level. See this document for the used calculations, scope and emissions.

Calculation extrapolation carbon footprint

The carbon footprint has been extrapolated for each of the following carbon sources based on the number FTE's:

- Non-renewable electricity
- Natural Gas
- District Heating
- Heating Oil
- Car Travel
- Air travel

For each of the above sources the coverage in FTE's has been calculated by adding up the no. of FTE's that corresponds to each country that reports data for the concerning source. The absolute carbon footprint of the concerning source, which corresponds to a certain coverage in FTE, is then being extrapolated to the total no. of FTE within the Business Group (ING Bank & Nationale-Nederlanden), i.e. a 100% coverage in FTE.

Reporting Scope 2012 - 2013

Scope definition

- Customers: all countries who have Retail banking activities (above 75% coverage of our business operations)
- Community Investment: countries with >100FTE and with management control (above 75% coverage of our business operations)
- Environment: countries with >200FTE, over which we have management control or that contribute at least 5% to our total carbon emissions based on 2012 data, were asked to provide environmental data (above 75% coverage of our business operations)

The following table (please see next page) contains the scope (no. of FTE) of the Environment module(s).



The following table contains the scope (no. of FTE) of the Environment module(s).

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Source Emission Factors 2013

Indicator	Emission Factor	Source	Comment
Long haul distance (air travel)	Air Passenger Distance - Long Haul - Average Class (+9% Uplift) (Direct)	GHG Protocol V1.3	Uplift factors (9%) applied (as recommended by DEFRA)
Medium Haul distance (air travel)	Air Passenger Distance - Domestic - Average Class (+9% Uplift) (Direct)	GHG Protocol V1.3 (worldwide figure)	Uplift factors (9%) applied (as recommended by DEFRA)
Short haul distance (air travel)	Air Passenger Distance - Short Haul - Average Class (+9% Uplift) (Direct)	GHG Protocol V1.3 (worldwide figure)	Uplift factors (9%) applied (as recommended by DEFRA)
Unknown haul - number of flights	Air Passenger Distance - Domestic - Average Class (+9% Uplift) (Direct)	GHG Protocol V1.3 (worldwide figure)	Distance calculated as historically: no flights x average flight distance (1760km). Assume medium haul.
Distance travelled by car	Road Vehicle Distance - Car (Average) - Unknown Fuel (Direct)	DEFRA 2013 (worldwide figure)	
Non-renewable electricity	Grid Electricity Generated - Average Load (Annual) (Direct)	GHG Protocol V1.3 country- specific figures for all except US, where DEFRA 2013 US figure applied.	Transmission losses will be accounted for in Scope 3, using country-specific values from DEFRA 2013.
			GHG Protocol V1.3 does not provide US-specific figure (suggests use of regional e-Grid values)
Renewable electricity	Grid Electricity Generated - Average Load (Annual) (Direct)	The emission factor for renewable energy has been set to zero	
District heating	Grid Heat Generated (Other) - Annual (Direct)	DEFRA 2013	
Heating oil	Stationary Fuel - Gas Oil (Volume) (Direct)	GHG Protocol V1.3 (worldwide figure)	
Natural gas	Stationary Fuel - Natural Gas (Volume) (Direct)	DEFRA 2013 (worldwide figure)	



Explanation 2012 – 2013

Energy usage

Due to ING's divestment strategy, the overall size of the company was reduced which resulted in a reduction in total energy usage.

Regarding our non-renewable electricity portfolio, a large reduction was made due to a major shift from non-renewable to renewable electricity in Germany.

Environmental data reported in 2013 is referring to all buildings including sales offices which are dedicated to serve the external clients, thus consumption for building related utilities (energy, gas etc) registered increased variances compared with 2012, especially when taking into account that the NN has taken a large decrease of business units.

Business Travel

The increase of car travel is because ING Bank Netherlands has not only reported on car business travel but also on lease kilometers. We have made the assumption for ING Bank Netherlands that 35% of the total lease kilometers are for business travel (based on information that we received from the lease company).

Due to ING's divestment strategy, the overall size of the company was reduced which resulted in a reduction in air travel. The results of divestments accounted for 92% of the total air travel of Insurance in 2012, of which Insurance USA accounted for 76%.