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# Whistleblower Policy

Personal Conduct Related Integrity Risk

ING encourages employees to report in good faith suspected or actual criminal conduct, unethical conduct or other misconduct by or within ING

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# Reading guide

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The Whistleblower Policy describes:

- in chapter 1, the Introduction;
- in chapter 2, the Principles;
- in chapter 3, the Risk Assessment and Control Objectives;
- in chapter 4, the Roles and Responsibilities; and
- in chapter 5, the References to other documents.

The Whistleblower Policy is complemented with appendices:

- Appendix A, the defined terms, where the definitions of the **bold and light blue** coloured terminology can be found;
- Appendix B, the exceptions to the **confidentiality** principle; and
- Appendix C, the **concerns** related to Board Members, ING **Whistleblower Reporting Officers** or Compliance Officers.

The Whistleblower Policy is supported by the Whistleblower Guidance. The Guidance describes the Whistleblower Reporting and Investigation procedure, it includes a flowchart and gives detailed guidance to **employees**, **Senior Management** and ING **Whistleblower Reporting Officers**.

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# 1. Introduction

The Whistleblower Policy (hereafter 'WBR Policy') guides and supports ING to:

- be responsive to all **employees**;
- be seen as a trusted organisation that treats its **employees** with respect; and
- demonstrate commitment to the Orange Code, ING Policies, laws and regulations.

As such, an effective whistleblower process is of vital importance to:

- protect the integrity of ING and its **employees**;
- comply with legal obligations;
- prevent financial loss and regulatory sanctions; and
- protect the reputation of ING.

The WBR Policy helps ensure ING can take appropriate and adequate action in case of (suspected) criminal conduct, unethical conduct or other misconduct by or within ING.

## 1.1 Objective

In line with the Orange Code values ('we are honest, prudent and responsible'), ING and the **Audit Committee** want to encourage and protect **employees** who come forward and report **concerns** in **good faith** by:

- encouraging a culture in which **employees** can raise **concerns** in **good faith** regarding suspected or actual criminal conduct, unethical conduct or other misconduct without having to fear any adverse consequences; and
- increasing the likelihood of alerting management to **concerns** so they can be addressed to prevent non-compliance with the Orange Code, ING Policies, laws and regulations, which may lead to impairment of ING's integrity, financial loss, regulatory sanctions and/or reputational damage.

The WBR Policy is intended to:

- encourage **employees** to report in **good faith** suspected or actual criminal conduct, unethical conduct or other misconduct by or within ING via the existing channels (e.g. immediate or next higher level manager or Human Resource department or Compliance Officer). However, if **employees** feel unable or uncomfortable to raise **concerns** through the existing channels, **employees** are encouraged to report in **good faith** the **concern** to an ING **Whistleblower Reporting Officer** or via the **External Whistleblowing Line**;
- protect **employees**, who report **concerns** in **good faith**, from suffering any adverse consequences;
- ensure reported **concerns** are timely and thoroughly investigated, with the appropriate investigative expertise and resources; and
- ensure **confidentiality** of the **whistleblower's** identity and reported **concerns**.

The WBR Policy outlines the principles, risk & control objectives and roles & responsibilities.

The WBR Policy is supported by the Whistleblower Guidance.

The Guidance describes the Whistleblower Reporting and Investigation procedure, it includes a process flow and gives detailed guidance to **employees**, **Senior Management** and ING **Whistleblower Reporting Officers**.

## 1.2 Scope

Compliance with the WBR Policy applies to all majority owned ING businesses (or business entities), businesses under ING's management control (including ING Groep N.V.) and their **employees**.

The WBR Policy applies to **concerns** about suspected or actual criminal conduct, unethical conduct or other misconduct by or within ING, for example:

- Accounting, internal accounting controls or auditing matters;
- Money laundering or terrorist financing or financing clients who violate human rights;
- Market abuse;
- Insider trading;
- Breach of client confidentiality or privacy;
- Theft;
- **Undesirable behaviours**;
- Fraud; and
- Bribery or corruption.

The WBR Policy does not apply to:

- complaints for which specific procedures have been established within ING, for example complaints related to certain types of labour law matters or personal grievances of **employees**; and
- complaints from clients or shareholders of ING Groep N.V. or **third parties**. As stated on the ING Group internet site, page "ING Group Whistleblower Policy", clients or shareholders of ING Groep N.V. or **third parties** can report suspected or actual criminal conduct, unethical conduct or other misconduct by or within ING to the Chief Compliance Officer via (e-)mail.

## 1.3 Local regulations

In jurisdictions where (local) laws or regulations set stricter rules than those set out in the WBR Policy, the stricter rules prevail.

## 1.4 Waivers and deviations

Except for deviations from the WBR Policy due to mandatory applicable laws and/or regulations, none of the WBR Policy principles and control objectives can be waived. In case of deviations due to mandatory applicable laws and/or regulations, approval from the policy owner, Corporate Compliance Risk Management, is required.

The deviation procedure is described in the document *ING In Control Framework (ICF) Binding Principles - Appendix D: Waiver and deviation procedure*, which was issued by the ING COO/Bankwide Operations department. The document can be found on the ING intranet site, page 'Index of all Global Policies'.

## 1.5 Control environment and testing

The WBR Policy must be implemented and embedded by all ING businesses as defined under paragraph 1.2 'Scope' of this policy.

In line with the *ING In Control Framework (ICF) Binding Principles*, the objectives of the WBR Policy are translated into inherent critical and high risks from an ING Groep N.V. overall perspective in chapter 3 'Risk Assessment and Control Objectives'. Local risks, regulations and/or applications have not been taken into account.

Based on the description of the inherent risk, a control objective describes what should be achieved to mitigate the risk. The control objectives described in the WBR Policy must be translated by **Senior Management** of the ING businesses into local controls. The local controls describe mitigating measures to meet the control objectives.

These local controls must be implemented and require testing. In line with the *ING ICF Binding Principles*, these local controls will be part of local Enterprise Risk Management (ERM) Risk & Control logs. Based on the local ERM risk & control logs, the design and operating effectiveness of the controls are to be tested by 1st Line of Defence staff in line with the *Non-Financial Risk Framework Key Control Testing & Monitoring Procedure*, unless indicated otherwise. This procedure was issued by Non-Financial Risk/Corporate Operational Risk Management department and can be found on the ING intranet site, page 'Index of all Global Policies'.

## **1.6 Defined terms**

The definitions of the **bold and light blue** coloured terminology are described in appendix A.

## 2. Principles

ING encourages employees to report in good faith suspected or actual criminal conduct, unethical conduct or other misconduct by or within ING.

The businesses and their **employees** in scope of the WBR Policy must adhere to the following principles:

1. Within ING it is important that we all give each other feedback and have an open dialogue. If **employees** notice a suspected or actual criminal conduct, unethical conduct or other misconduct by or within ING that leads or could lead to a violation of:

- the Orange Code; and/or
- any ING Policy; and/or
- any law and regulation;

they are foremost encouraged to raise their **concern** via the existing channels (e.g. immediate or next higher level manager or Human Resource department or Compliance Officer) and not keep it to themselves or ignore it. This will prevent impairment of ING's integrity, financial loss, regulatory sanctions and/or reputational damage.

However, if **employees** feel unable or uncomfortable to raise **concerns** through the existing channels, the whistleblower channels provide means for **employees** to report **concerns**.

2. **Employees** should have **anonymous** and easy access to report **concerns** in **good faith** to an ING **Whistleblower Reporting Officer** or via the **External Whistleblowing Line**. There are no repercussions for reporting a **concern** in **good faith**, even if it turns out to be unfounded.
3. The **anonymity** of the **whistleblower**, the **confidentiality** of the **whistleblower's** identity and details of the **concern** are respected and protected. For exceptions on the **confidentiality** principle, see Appendix B.
4. Reported **concerns** are investigated promptly, recorded and retained in accordance with applicable laws, regulations, policies and procedures.
5. The data of the **whistleblower** and/or the data subjects involved in the investigations are properly recorded and/or retained and destroyed in conformity with applicable laws, regulations, policies and procedures e.g. regarding data protection and privacy restrictions.
6. Utmost efforts are made to protect the following individuals from **retaliation**:
  - the **whistleblower** who reports a **concern** in **good faith**;
  - an **employee** who provides information; and
  - an **employee** who otherwise assists in a **Preliminary Investigation** and/or **Full Investigation**.

### 3. Risk Assessment & Control Objectives

The following table provides an overview of inherent high and critical risks and the related control objectives from an ING overall perspective. The control objectives are mandatory for all ING businesses in scope of the WBR Policy.

Risk	Control objective
<p><b>Risk of</b> impairment of ING’s integrity, financial loss, regulatory sanctions and/or reputational damage  <b>due to concerns</b> on suspected or actual criminal conduct, unethical conduct or other misconduct by <b>employees</b> not being reported/not being followed up,  <b>confidentiality</b> not being protected or respected (or perceived failure thereof)  <b>caused by</b> one or more of the following:</p>	
<p><b>1</b> <b>Employees</b> are not aware of the Whistleblower Policy</p>	<p><b>A</b> <b>Employees</b> understand and are aware<sup>1</sup> of the Whistleblower Policy which encourages them to report <b>concerns</b> in <b>good faith</b> of suspected or actual criminal conduct, unethical conduct or other misconduct by or within ING</p>
<p><b>2</b> <b>Employees</b> have no <b>anonymous</b> and easy access to an ING <b>Whistleblower Reporting Officer</b> and/or <b>External Whistleblowing Line</b></p>	<p><b>B</b> <b>Anonymous</b> and easy access for every <b>employee</b> to the correct ING <b>Whistleblower Reporting Officer</b> and/or <b>External Whistleblowing Line</b></p>
<p><b>3</b> <b>Employees</b> are not confident to report a <b>concern</b> to an ING <b>Whistleblower Reporting Officer</b></p>	<p><b>C</b> Actions<sup>2</sup> are taken by <b>Senior Management</b> to ensure sufficient confidence of <b>employees</b> to report <b>concerns</b> to an ING <b>Whistleblower Reporting Officer</b><sup>3</sup></p>
<p><b>4</b> <b>Senior Management</b> does not have proper roles and responsibilities allocated for the protection of and follow up on the reported <b>concerns</b> in line with the Orange Code and applicable ING Policies, laws and regulations</p>	<p><b>D</b> Clear roles and responsibilities for follow up on and investigation of reported <b>concerns</b> are allocated in line with the Orange Code and applicable ING Policies, laws and regulations</p>

<sup>1</sup> This includes the training of the ING **Whistleblower Reporting Officers** how to deal with reported **concerns**.

<sup>2</sup> Periodic assessments are performed to assess the confidence of **employees** to report **concerns** (e.g. by means of a Winning Performance Culture survey or Compliance Risk Culture Monitoring or a survey regarding the Whistleblower Policy and /or procedure) and appropriate actions are taken based on the results.

<sup>3</sup> Instead of preferring to report **concerns** via the **External Whistleblowing Line**.



## 4. Roles and responsibilities

### 4.1 Employees

**Employees** are:

- encouraged to being vigilant, challenging questionable behaviours and reporting any **concern** by considering the existing channels. If an **employee** does not feel comfortable to report a **concern** via the existing channels, then **employees** are encouraged to report a **concern** in **good faith** under the WBR Policy by using the whistleblower channels;
- encouraged to report a **concern** in **good faith** to an ING **Whistleblower Reporting Officer** before using the **External Whistleblowing Line**. For **concerns** related to Members of the Executive Board of ING Groep N.V., Members of the Management Banking Board of ING Bank N.V., Members of the Supervisory Board of ING Groep N.V. and ING Bank N.V., ING **Whistleblower Reporting Officers** or Compliance Officers, see Appendix C;
- permitted to consult an ING **Whistleblower Reporting Officer** or the **External Whistleblowing Line** before reporting a **concern**;
- responsible for ensuring they understand the WBR Policy and the consequences when they do not comply with the WBR Policy;
- obliged to provide all relevant information relating to the reported **concern** and be available to the ING **Whistleblower Reporting Officer** in the event of an investigation;
- obliged to respect **confidentiality** when involved in an investigation;
- prohibited from attempting to discover the identity of any **whistleblower**, who has chosen to report a **concern anonymously**; and
- responsible to report immediately to an ING **Whistleblower Reporting Officer** or using the **External Whistleblowing Line** any **retaliation** or suspected **retaliation** after a **concern** has been reported.

### 4.2 Senior Management

In addition to paragraph 4.1, **Senior Management** is responsible for:

- the implementation, execution and supervision of the WBR Policy;
- setting the appropriate tone at the top and ensuring that all managers in their unit do the same by clearly supporting and sponsoring the creation of an open culture in order to encourage **employees** to report **concerns**;
- defining and overseeing that appropriate processes, procedures and systems are in place to comply with the WBR policy;
- ensuring that training on the WBR Policy is developed for and undertaken by all **employees**;
- appointing an ING **Whistleblower Reporting Officer**;
- ensuring publication and easy access on the ING intranet of the correct contact details of the (next higher level) ING **Whistleblower Reporting Officer(s)** and the **External Whistleblowing Line**; and
- requesting a **Full Investigation** if a **concern** is sufficiently grounded to start a **Full Investigation**.

### 4.3 Compliance Officers

In addition to paragraph 4.1, Compliance Officers are responsible for:

- advising **Senior Management** on the implementation and embedding of the WBR Policy;
- advising **Senior Management** about local deviations from the WBR Policy;
- advising **employees** on the interpretation of the WBR Policy;
- advising **Senior Management** on **employee** awareness initiatives (e.g. sharing best practices, training and communication materials); and
- second line monitoring on embedding of and compliance with the WBR Policy.

#### 4.4 ING Whistleblower Reporting Officers

In addition to paragraph 4.1, ING **Whistleblower Reporting Officers** are responsible for:

- receiving **concerns** and, to the extent possible, acknowledgement of receipt from (potential) **whistleblowers**;
- performing the follow up on reported **concerns** timely and adequately, in conformity with the Orange Code and applicable ING Policies, laws and regulations;
- providing the **whistleblower** on his/her request with an update on the general status of the progress of the investigation but not on the details of the investigation;
- determining whether the reported **concern** is in scope of the WBR Policy;
- conducting a **Preliminary Investigation**, for all reported **concerns** which are in scope of the WBR Policy, to determine if a **concern** is sufficiently grounded to start a **Full Investigation**;
- consulting with a higher level ING **Whistleblower Reporting Officer** and/or the **Corporate Advisory Team** in case support is desirable and/or in case of doubt;
- consulting with a higher level ING **Whistleblower Reporting Officer** and/or the **Corporate Advisory Team** in case (a member of) **Senior Management** is subject of the **concern**;
- advising **Senior Management** on the merits to request a **Full Investigation**;
- consulting with the next higher level ING **Whistleblower Reporting Officer** in case **retaliation** is reported;
- determining the persons who are/become **Authorised Person** only when strictly necessary for the handling and/or investigation of the reported **concern**;
- providing information to the next higher level ING **Whistleblower Reporting Officers** and other **Authorised Persons** on a strict 'need to know' basis;
- reporting on a quarterly basis the **concerns** (including the status) to the next higher level ING **Whistleblower Reporting Officer**. These reports will not contain the identity of the **whistleblowers**; and
- immediately informing the next higher level ING **Whistleblower Reporting Officer** in case of a **concern** with a material impact. The *Non-Financial Risk Framework – External & Internal Events procedure*, issued by the Non-Financial Risk/Corporate Operational Risk Management department, describes how the level of materiality can be determined. The document can be found on the ING intranet site 'Index of all Global Policies'.

#### 4.5 Audit Committee

The **Audit Committee**, is responsible for overseeing the monitoring of and response to **concerns**, including:

- promulgating the WBR Policy and procedures;
- ensuring that at least the Chairman of the **Audit Committee** attends the meetings of the **Risk Committee** and that therefore the **Audit Committee** is aware of the status of **concerns** within ING;
- establishing procedures with regard to the receipt, retention, and treatment of **concerns** received by ING regarding accounting, internal accounting controls, or auditing matters;
- establishing procedures with regard to **confidential** submission of **concerns** regarding questionable accounting or auditing matters; and
- passing a resolution indicating their review and approval of the WBR Policy and procedures.

#### 4.6 ING Group Whistleblower Reporting Officer

In addition to paragraph 4.1, the ING Group **Whistleblower Reporting Officer** is responsible for:

- periodically reporting to the Chief Executive Officer of ING Groep N.V. and subsequently to the **Audit Committee** how the WBR Policy and related local procedures are functioning generally. These reports will not contain the identity of the **whistleblowers**; and
- immediately reporting to the Chief Executive Officer of ING Groep N.V. if some of the **concerns** rise to a materiality level that would result in reporting to/discussion in the **Risk/Audit Committee** meetings. These reports will not contain the identity of the **whistleblowers**.

## 5. References to other documents

<b>Data Management Minimum Standard</b>	The Data Management Minimum Standard aims to cover the risks and control objectives regarding Information Management as defined in the Information Processing Policy. The Minimum Standard concerns people, processes, information, technology, facilities and all data.
<b>Global Data Protection Policy for Client, Supplier and Business Partner Data</b>	All <b>employees</b> are expected to handle information with care. In particular, the security and <b>confidentiality</b> of all proprietary information and data processing, including personal information, must be safeguarded in accordance with applicable laws and regulations. This policy explains what the protection of personal data is about.
<b>Global Data Protection Policy for Employee Data</b>	All <b>employees</b> are expected to handle information with care. In particular, the security and <b>confidentiality</b> of all proprietary information and data processing, including <b>employees'</b> personal information, must be safeguarded in accordance with applicable laws and regulations. This policy explains what the protection of personal data is about.
<b>Global Record Retention Minimum Standard</b>	The Global Record Retention Minimum Standards describes the minimum level of controls that is required and specifies the risk assessment, control objectives and controls to mitigate the risks of financial loss and/or reputational damage due to records being unavailable when needed or unnecessarily exist.
<b>Non-Financial Risk Framework External &amp; Internal Events Procedure</b>	The Non-Financial Risk External and Internal Events procedure outlines the processes for the management of external and internal operational risk events.
<b>Non-Financial Risk Framework Key Control Testing &amp; Monitoring Procedure</b>	The Non-Financial Risk Framework Key Control Testing & Monitoring Procedure aims to describe Key Control Testing, Second Line Monitoring and Functional Oversight Monitoring in order to continuously monitor and assess the adequacy of the implementation of the Non-Financial Risk Framework.
<b>Special Investigation Policy</b>	The Special Investigation Policy specifies how the <b>Full Investigation</b> of (suspected) misconduct by an <b>employee</b> is to be initiated, conducted and resolved. Furthermore this policy specifies which incidents are to be investigated under responsibility of the ING Corporate Security and Investigation department.
<b>Whistleblower Guidance</b>	The Whistleblower Guidance supports the WBR Policy. The Guidance describes the Whistleblower Reporting and Investigation procedure, it includes a process flow and gives detailed guidance to <b>employees, Senior Management</b> and ING <b>Whistleblower Reporting Officers</b> .

## Appendix A Defined terms

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### Anonymous(ly)/ Anonymity

The unknown identity of the **whistleblower**. A **whistleblower** is **anonymous** when his/her identity is not known to any **employee** (including the ING **Whistleblower Reporting Officers** and **Authorised Persons**) and the **External Whistleblowing Line**.

### Audit Committee

The **Audit Committee** is one of the permanent committees within the Supervisory Board of ING Groep N.V. and ING Bank N.V.. The Audit Committee consists of at least four members and meets at least four times a year. The **Audit Committee** assists the Supervisory Board in monitoring the integrity of the financial statements of ING Groep N.V. and ING Bank N.V., in monitoring the compliance with legal and regulatory requirements, and in monitoring the independence and performance of ING's internal and external auditors.

The names of the **Audit Committee** members can be found on the ING Group Internet site.

### Authorised Persons

These are persons who are strictly necessary for the handling and/or investigation of the **whistleblower's concern**. The ING **Whistleblower Reporting Officer** determines the persons who are/become **Authorised Person**. **Authorised Persons** (could) include:

- ING **Whistleblower Reporting Officers** (systematic);
- **Corporate Advisory Team** members (ad hoc);
- Chief Compliance Officer delegated persons (ad hoc);
- Representatives of (ad hoc):
  - Human Resources department;
  - Security & Investigations department;
  - Internal Audit department;
  - Legal department; and
  - Compliance Risk Management department.
- External consultants (e.g. lawyers) or investigators (ad hoc).

**Senior Management** may be included in the circle of **Authorised Persons**, but this must be determined by the ING **Whistleblower Reporting Officer** on a case-by-case basis with special consideration given to potential conflicts of interest and **confidentiality**.

### Confidential(ity)

This refers to the non-disclosure of certain information such as the identity of the **whistleblower**, the content of the **concern** as well as any other details related to the **concern** and any investigation of the **concern**. This also includes any information that relates to the identity of the **whistleblower**. Information is only shared with **Authorised Persons** and only on a strict 'need to know' basis.

### Concern

A situation raised by a **whistleblower** about a suspected or actual criminal conduct, unethical conduct or other misconduct by or within ING that leads or could lead to a violation of:

- the Orange Code; and/or
- any ING Policy; and/or
- any law and regulation (including codes, e.g. the Dutch Banking Code).

### Corporate Advisory Team

Supports the ING **Whistleblower Reporting Officers** and consists of representatives of:

- Corporate Human Resources;
- Corporate Security & Investigations;
- Corporate Legal; and
- Corporate Compliance Risk Management.

The **Corporate Advisory Team** will appoint a single point of contact for the ING **Whistleblower Reporting Officers**.

<b>Employee</b>	Any natural person working for or on behalf of ING, on contract or temporary, including <b>Senior Management</b> and members of the Executive Board, Management Board Banking and the Supervisory Board, persons on secondment and persons hired as external <b>employees</b> .
<b>External Whistleblowing Line</b>	An external channel through which <b>whistleblowers</b> can report a <b>concern</b> <b>anonymously</b> or by disclosing his/her identity. This whistleblower channel, provided by an independent external party, allows <b>employees</b> to use an alternative whistleblower channel to report <b>concerns</b> by using e-mail, phone or the website of the provider.
<b>Full Investigation</b>	The investigation following the <b>Preliminary Investigation</b> . The <b>Full Investigation</b> will be conducted by ING Corporate Security & Investigations, by the relevant local investigations unit and/or by any external party as appointed by ING Corporate Security & Investigations or the relevant local investigations unit. The <b>Full Investigation</b> and the case settlement will be carried out according to the <i>Special Investigation Policy</i> .
<b>Good faith</b>	A <b>concern</b> is reported in <b>good faith</b> when the <b>concern</b> is not raised maliciously and when it is based on reasonable facts and/or circumstances that allow for the assumption that the <b>concern</b> is sufficiently grounded.
<b>Preliminary Investigation</b>	If the reported <b>concern</b> is in scope of the WBR Policy, an inquiry is performed in order to confirm or reject the <b>concern</b> by determining whether there are reasonable facts and/or circumstances to start a <b>Full Investigation</b> .
<b>Retaliation</b>	This is any adverse action taken against a <b>whistleblower</b> as a result of reporting the <b>concern</b> or taken against any other <b>employee</b> who provides information or who otherwise assists in a <b>Preliminary</b> and/or <b>Full Investigation</b> . Examples of such adverse actions could include, but are not limited to, harassing, threatening, firing or demoting, reducing benefits, transferring to another part of the organisation, failure to fulfil an agreed commitment, changing working hours or office location or changing responsibilities.
<b>Risk Committee</b>	The <b>Risk Committee</b> consists of at least three members. The <b>Risk Committee</b> assists and advises the Supervisory Board of ING Groep N.V. and ING Bank N.V. in monitoring the risk profile of the company as well as the structure and operation of the internal risk management and control systems. The names of the <b>Risk Committee</b> members can be found on the ING Group Internet site.
<b>Senior Management</b>	Appointed persons, who are individually or jointly responsible for the decision-making, general operation and administration of legal entities, business lines, departments, management bodies or similar.
<b>Third parties</b>	Any entity or a person which performs services for or acts on behalf of ING under a contractual agreement including as an agent, broker, intermediary, contractor, sub-contractor, supplier, lobbyist, lawyer, consultant, outsourcing partner or joint venture partner.
<b>Undesirable behaviours</b>	Behaviours such as discrimination, sexual intimidation, harassment, aggression, violence, bullying and violation of <b>employee's</b> personal privacy.
<b>Whistleblower</b>	An <b>employee</b> who reports a <b>concern</b> in accordance with the WBR Policy.
<b>Whistleblower Reporting Officer</b>	An <b>employee</b> , who has been appointed to manage <b>whistleblower concerns</b> <b>confidentially</b> . The ING <b>Whistleblower Reporting Officers</b> are appointed at various levels of the organization, i.e. entity and/or country and/or region.

## Appendix B Exceptions to the confidentiality principle

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Exceptions to the **confidentiality** principle:

- **Identity**

As a matter of principle, the identity of a **whistleblower** who has not reported **anonymously** is only known to the ING **Whistleblower Reporting Officer** receiving the reported **concern** and is not disclosed to anyone else unless:

  - it is strictly necessary for one or more of the **Authorised Persons** to know; and/or
  - ING is legally obliged to disclose a **whistleblower**'s identity.
- **Concern**

In case ING is legally required by applicable law or regulation to disclose information regarding a **concern**, to an external party who is legitimately authorized. This would be the case for example when ING must obey to court orders, to information requests from, or reporting obligations to, public authorities such as regulators, the police, the local department of justice or "Ombudsman".
- **ING decides to report**

In case ING decides to disclose information to relevant regulatory or criminal investigations authorities. If ING decides to disclose information to the authorities, the **confidentiality** of the **whistleblower**'s identity is fully respected, unless ING is legally obliged to disclose a **whistleblower**'s identity.



## Appendix C

# Concerns related to Board Members, ING Whistleblower Reporting Officers or Compliance Officers

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### 1. Concerns related to Executive or Management Banking Board Members

In the event that the **concern** relates to a member of the Executive Board of ING Groep N.V. and/or Management Banking Board of ING Bank N.V., the **whistleblower** or the ING **Whistleblower Reporting Officer** receiving the **concern** must report the matter to the chairman of the Supervisory Board of ING Groep N.V., respectively the chairman of the Supervisory Board of ING Bank N.V., and to the ING Group **Whistleblower Reporting Officer**.

### 2. Concerns related to Supervisory Board Members

- In the event that the **concern** relates to a member of the Supervisory Board of ING Groep N.V., the **whistleblower** or the ING **Whistleblower Reporting Officer** receiving the **concern**, must report the matter to the chairman of the Supervisory Board of ING Groep N.V. and to the ING Group **Whistleblower Reporting Officer**.
- In the event that the **concern** relates to the chairman of the Supervisory Board of ING Groep N.V., the ING **Whistleblower Reporting Officer** will report to the deputy-chairman of the Supervisory Board of ING Groep N.V. or in case of his/her absence, to the most senior member (in terms of years of Supervisory Board membership) of the Supervisory Board of Groep N.V..
- In the event that the **concern** relates to a member of the Supervisory Board of ING Bank N.V., the **whistleblower** or the ING **Whistleblower Reporting Officer** receiving the **concern**, must report the matter to the chairman of the Supervisory Board of ING Bank N.V. and to the ING Group **Whistleblower Reporting Officer**.
- In the event that the **concern** relates to the chairman of the Supervisory Board of ING Bank N.V., the ING **Whistleblower Reporting Officer** will report to the deputy-chairman of the Supervisory Board of ING Bank N.V. or in case of his/her absence, to the most senior member (in terms of years of Supervisory Board membership) of the Supervisory Board of Bank N.V..

### 3. Concerns related to ING Whistleblower Reporting Officer or Compliance Officer

- In the event that the **concern** relates to an ING **Whistleblower Reporting Officer** or a Compliance Officer, the **whistleblower** must report the **concern** to the next higher level ING **Whistleblower Reporting Officer**.
- In the event that the **concern** relates to the Chief Compliance Officer, the **whistleblower** or the ING **Whistleblower Reporting Officer** receiving the **concern** must report the **concern** to the ING Group **Whistleblower Reporting Officer**.
- In the event that the **concern** relates to the ING Group **Whistleblower Reporting Officer** or in the event that the Chief Compliance Officer is the ING Group **Whistleblower Reporting Officer**, the **whistleblower** or the ING **Whistleblower Reporting Officer** receiving the **concern** must report the **concern** to the Chief Executive Officer of ING Groep N.V. and to the Chief Risk Officer of ING Groep N.V..