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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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.

Issued by: ING Group Compliance
Version: 1.3
1. Introduction

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

• be responsive to all whistleblowers;
• be seen as a trusted organisation that treats whistleblowers 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;
• comply with legal obligations;
• prevent financial loss and regulatory sanctions;
• protect the reputation of ING.

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

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.

1.1 Objective

In line with the Orange Code values (‘we are honest, prudent and responsible’), ING wants to encourage and protect whistleblowers who come forward and report concerns in good faith by:

• encouraging a culture in which whistleblowers 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 help ING getting a better and safer business by preventing 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, former employees, candidates, and parties with whom ING has a business relationship (such as contractors, subcontractors and suppliers), collectively referred to as whistleblowers in this Policy, to report in good faith suspected or actual criminal conduct, unethical conduct or other misconduct by or within ING;
• encourage the persons in scope to initially report using the existing channels (e.g., immediate or next higher-level manager or Human Resource department or Compliance Officer). However, if whistleblowers feel unable or uncomfortable to raise concerns through the existing channels, they are encouraged to report in good faith the concern to an ING Whistleblower Reporting Officer or via the External Whistleblowing Line;
• protect whistleblowers 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;
• ensure confidentiality of the whistleblower’s identity and reported concerns.
1.2 Scope
This Policy applies to employees, former employees, candidates, and parties with whom ING has a business relationship (such as contractors, subcontractors and suppliers).

Whistleblowers who report in good faith any suspected or actual criminal conduct, unethical conduct or other misconduct, including a (suspected) breach of (EU) law by or within ING are eligible for protection under the WBR Policy. It should be noted that although ING will take all reasonable steps to support a whistleblower throughout the process described in this Policy, the level of support may differ between employees and non-employees.

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 including a (suspected) breach of (EU) law by or within ING, including but not limited to:
- Accounting, internal accounting controls or auditing matters;
- Money laundering or terrorist financing or financing clients who violate human rights;
- Market manipulation;
- Insider dealing;
- Breach of client confidentiality or privacy;
- Theft;
- Fraud;
- Bribery or corruption; and
- Undesirable behaviours.

The WBR Policy may not apply to:
- Complaints (not being a concern as defined in this Policy) for which specific procedures have been established within ING, for example complaints related to IT, certain types of labour law matters (e.g. disagreement about appraisals) or customer complaints. To assess whether these complaints are in scope of the WBR Policy, these complaints will be assessed on a case-by-case basis. If not in scope of the WBR Policy, these complaints will be redirected to the appropriate channel.

The WBR Policy does not apply to:
- External complaints (not being a concern as defined in this Policy) 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 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
In case of deviations due to mandatory applicable laws and/or regulations, approval from Group Compliance as policy owner 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/ Bank-wide 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 considered.

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 any person 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 any person notices 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.

   However, if any person feels unable or uncomfortable to raise concerns through the existing channels, the whistleblower channels provide additional means to report concerns.

2. Any person 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. Any form of retaliation will not be tolerated. Utmost efforts are made to protect the following individuals from retaliation:
   - the whistleblower who reports a concern in good faith;
   - any person who provides information in good faith; and
   - any person who otherwise assists in a Preliminary Investigation and/or Full Investigation; and
   - any person who assists the whistleblower in the reporting process (such as a trusted advisor, colleagues or relatives of the whistleblower) who are also in a work-related connection with ING.
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.

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

\(^1\) This includes the training of the ING Whistleblower Reporting Officers how to deal with reported concerns.

\(^2\) 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.

\(^3\) 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.

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 a qualified ING Whistleblower Reporting Officer;
- ensuring publication and easy access on the ING intranet and ing.com 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/challenging Senior Management on the implementation and embedding of the WBR Policy;
- Advising/challenging Senior Management about local deviations from the WBR Policy;
- advising any person on the interpretation of the WBR Policy;
- advising/challenging 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 to (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 with timely updates on the general status of the progress 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;
- always 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 respect the confidentiality of the reported concern; and
- immediately informing the next higher level ING Whistleblower Reporting Officer in case of a concern with a material impact. These reports will respect the confidentiality of the reported concern. 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 regarding the receipt, retention, and treatment of concerns received by ING regarding accounting, internal accounting controls, or auditing matters;
- establishing procedures regarding 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 4.4, 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 be submitted according to the Quarterly Reporting process and 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

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<thead>
<tr>
<th>Document Type</th>
<th>Description</th>
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<tr>
<td>Data Management Minimum Standard</td>
<td>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.</td>
</tr>
<tr>
<td>Global Data Protection Policy for Client, Supplier and Business Partner Data</td>
<td>All employees are expected to handle information with care. In particular, the security and confidentiality 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.</td>
</tr>
<tr>
<td>Global Data Protection Policy for Employee Data</td>
<td>All employees are expected to handle information with care. In particular, the security and confidentiality of all proprietary information and data processing, including employees’ personal information, must be safeguarded in accordance with applicable laws and regulations. This policy explains what the protection of personal data is about.</td>
</tr>
<tr>
<td>Global Record Retention Minimum Standard</td>
<td>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.</td>
</tr>
<tr>
<td>Non-Financial Risk Framework External &amp; Internal Events Procedure</td>
<td>The Non-Financial Risk External and Internal Events procedure outlines the processes for the management of external and internal operational risk events.</td>
</tr>
<tr>
<td>Special Investigation Policy</td>
<td>The Special Investigation Policy specifies how the Full Investigation of (suspected) misconduct by an employee 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.</td>
</tr>
<tr>
<td>Whistleblower Guidance</td>
<td>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 employees, Senior Management and ING Whistleblower Reporting Officers.</td>
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</table>
Appendix A Defined terms

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;
  - Compliance 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(s)

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:

- Group Human Resources;
- Corporate Security & Investigations;
- Group Legal;
- Group Compliance Head of Conduct Compliance & Culture;
- A Secretary (to be assigned by Corporate Advisory Team chair)

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

Employee(s)

Any natural person working for or on behalf of ING, on contract or temporary, including Senior Management and members of the Executive Board, Management Board Banking and the Supervisory Board, persons on secondment, paid and unpaid interns, volunteers or trainees, and persons hired as external employees, including self-employed workers.

External Whistleblowing Line

An external channel through which whistleblowers can report a concern anonymously or by disclosing his/her identity. This whistleblower channel, provided by an independent external party, allows whistleblowers to use an alternative whistleblower channel to report concerns by using e-mail, phone or the website of the provider.

Full Investigation

The investigation following the Preliminary Investigation. The Full Investigation will be conducted by the relevant investigations unit and/or by any external party as appointed by the relevant unit and in accordance with applicable policies and charters. (See Whistleblower Guidance for more detailed information.) The Full Investigation and the case settlement will be carried out according to the Special Investigation Policy.

Good faith

A concern is reported in good faith when the concern is not raised maliciously and when it is based on reasonable facts and/or circumstances that allow for the assumption that the concern is sufficiently grounded.

Preliminary Investigation

If the reported concern is in scope of the WBR Policy, an inquiry is performed in order to confirm or reject the concern by determining whether there are reasonable facts and/or circumstances to start a Full Investigation. (See Whistleblower Guidance for more detailed information.)

Retaliation

This is any adverse action including threats or attempts taken against a whistleblower as a result of reporting the concern or taken against any other employee who provides information or who otherwise assists in a Preliminary and/or Full Investigation.

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.

Risk Committee

The Risk Committee consists of at least three members. The Risk Committee 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 Risk Committee members can be found on the ING Group Internet site.

Whistleblower Policy
<table>
<thead>
<tr>
<th><strong>Senior Management</strong></th>
<th>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.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Third parties</strong></td>
<td>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.</td>
</tr>
<tr>
<td><strong>Undesirable behaviours</strong></td>
<td>Behaviours such as discrimination, sexual intimidation, harassment, aggression, violence, bullying and violation of a person's personal privacy.</td>
</tr>
<tr>
<td><strong>Whistleblower(s)</strong></td>
<td>Any person is eligible for protection as a whistleblower under this WBR Policy when they report a concern in the context of their work-related activities in good faith. These individuals include employees, former employees, candidates, and parties with whom ING has a business relationship (such as contractors, subcontractors and suppliers).</td>
</tr>
<tr>
<td><strong>Whistleblower Reporting Officer</strong></td>
<td>An employee, who has been appointed to manage whistleblower concerns confidentially. The ING Whistleblower Reporting Officers are appointed at various levels of the organization, i.e. entity and/or country and/or region.</td>
</tr>
</tbody>
</table>
Appendix B Exceptions to the confidentiality principle

Regardless of the confidentiality principle any person retains the right to disclose relevant information to appropriate authorities.

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 after prior consent by the whistleblower; 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

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

Supervisory Board of ING Groep N.V:

- 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..

Supervisory Board of ING Bank 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.