



Compliance Risk

## Global Whistleblower Policy

ING's commitment to encourage and protect reporters

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# Reading guide

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This Policy describes:

- in chapter 1, the Introduction and Scope;
- in chapter 2, the Obligations;
- in chapter 3, the Risk Types and Control Objectives;
- in chapter 4, the References to other documents.

The Whistleblower Policy (hereafter “Policy”) is complemented with appendices:

- Appendix A, gives an overview of the defined terms. These are highlighted in **bold and light blue** when used for the first time;
- Appendix B, the exceptions to the **confidentiality** principle; and
- Appendix C, the **concerns** related to Board Members, ING **Whistleblower Reporting Officers (WBRO)** or Compliance Officers.

The Whistleblower Policy is supported by the Global Whistleblowing Procedure (“hereafter Procedure”), the Whistleblowing Control Standard Document and the Integrated Training & Awareness Control Standard. The Procedure describes the Whistleblowing and Investigation Procedure, it includes a flowchart and gives detailed guidance to **employees, senior management** and ING **Whistleblower Reporting Officers**. WBRO’s are expected to apply the Policy in practice starting January 2024 as and when new concerns are raised. The Policy is also supported by the Global Investigations Charter.

**Issued by:** ING Group Compliance  
**Replaces:** ING Group Whistleblower Policy 2022  
**Approved by:** Audit Committee ING Group on 30 January 2024 (V2.0)

**Approved adjustments:** The Whistleblower Policy has been adjusted to cover anti- **retaliation** measures, consequence management and **after care**.  
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**Contact details:** Chief.compliance.Officer@ing.com  
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**C2–Restricted**

# 1. Introduction

## 1.1 Objective

As a global bank, ING plays an important role in society. ING's public role has been anchored in the [Orange Code](#) - the behaviours and values ING aspires to and which act as a promise to the outside world: 'Integrity Above All, by balancing the rights and interests of all stakeholders'. This is how ING wants to reach its purpose in 'Empowering people to stay a step ahead in life and in business'. The success of ING's purpose and strategy, as well as its results, depends on ING's relationship with its stakeholders – ING must carefully balance the rights and interests of the people the business touches. Based on (i) minimum requirements (laws and regulations imposed on us by society) and (ii) the ambition level (our Orange Code), the aim is to strengthen the resolve to act with courage to do the right thing.

This Policy provides instructions on treating **concerns** in a careful and proportionate manner ensuring that ING takes appropriate, lawful, and timely action in case of **concerns** by or within ING. The Policy guides and supports ING via its obligations and control objectives (i) to be responsive to all **Reporters** and (ii) to be a trusted organisation that ensures the safety of all **Reporters** and treats them with respect. In doing so, the Policy demonstrates ING's commitment to the Orange Code, ING Policies, laws and regulations.

This Policy aims to mitigate the risk of breaches of the values, behaviours and principles in the Orange Code, the Global Code of Conduct, laws and regulations, and principles in ING risk policies as a consequence of not carefully dealing with **concerns**.

## 1.2 Position in risk taxonomy

In the Non-Financial Risk Taxonomy there is a Level 1 Conduct Risk. Underneath, there is a Level 2 (L2) risk called 'Culture & Ethics'. Under it, the level 3 (L3) Whistleblowing risk is attached – the risks described in this Policy are as such at L3 level. The L2 Risk on 'Culture & Ethics' will remain unchanged until 2025, at that moment Conduct Ethics will formally become a Risk Driver and the L2 'Ethics' risk will be removed from the Compliance Risk Charter and the Non-Financial Risk Taxonomy will be updated to reflect this change.

## 1.3 Scope

Compliance with the 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 **concern** reporting process applies to **reporters**, i.e. (former) **employees**, candidates, and parties with whom ING has a business relationship (such as shareholders, contractors, subcontractors and suppliers). **Reporters** who raise **concerns** with **reasonable grounds** are eligible for protection under the Policy. Whistleblowing applies to **concerns**, including but not limited to:

**Undesirable behaviour**, like:

- Aggression and Violence
- Bullying
- Discrimination
- Harassment
- **Retaliation**
- Sexual Harassment

**Working Environment & Sustainability**, like:

- Work pressure/ Unrealistic targets
- Working Environment
- Workers Conflict
- Climate, Environment and Human Rights

**Other breaches**, like:

- Accounting, internal accounting controls or auditing matters
- Other: (i) Breach of any external Law or Regulation or (ii) Breach of any ING Policy
- Fraud / Theft

- Antitrust/ Competition law
- Breach of **confidentiality** and data privacy related to client/ **employee**
- Conflicts of Interest
- Unfair Customer Treatment
- Market abuse / Insider trading

See the Global Whistleblowing Procedure - Annex A for detailed **concern** category list and definitions.

The Policy does not apply to:

- Complaints (not being a **concern** as defined in this Policy), 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 Policy, these complaints will be assessed on a case-by-case basis. If not in scope of the Policy, these complaints will be redirected to the appropriate channel.
- External complaints (not being a **concern** as defined in this Policy) from clients of ING Groep N.V. or **third parties**. As stated on the ING Group internet site, page "ING Whistleblower Policy", clients can report **concerns** to the Chief Compliance Officer via (e-)mail.
- Topics or incidents raised to other formal ING channels (such as HR, **Confidential** Advisors, **Employee** (grievance) councils, Fraud, Data Protection, CSI / local Special Investigation Functions etc.). Topics or incidents raised to these channels shall initially follow the specific (local) procedures and processes.

## 1.4 Overview of regulations

The Whistleblower Policy is based on:

- The EU Directives and Regulations in the area of protecting those who report on **concerns**;
- EU Directive 2019/1937 on the protection of persons who report breaches of Union law;
- Dodd-Frank Act.

## 1.5 Local regulations and local annex

In jurisdictions where local legislation is more stringent, the local legislation prevails. Additional local legal requirements and approved waivers and deviations to Global Policy must be specified in a local annex to the Policy as specified in *Internal Control Binding Principles*. Local annexes to a Policy must be approved by:

- (Relevant) local 2LoD; and
- (Relevant) local **Risk Committee** (for example, Non-Financial **Risk Committee**) or the relevant local management committee.

The following information must be submitted for approval together with the local annex: (1) nature and source of the additional local requirements and (2) measures taken in addition to (those specified in) the Global Whistleblower Policy to tackle the additional legal requirements.

Once approved, local annexes to Global Whistleblower Policy together with approvals must be submitted for information by the responsible local 2LoD to the policy owner/policy editor.

## 1.6 Implementation and embedding of the Global Policy

The Policy obligations and control objectives are translated into a control defined in the Control Standard to ensure compliance with the Whistleblower Policy. The obligations of the Policy must be duly assessed by each ING entity and integrated into all relevant local processes.

## 1.7 Waivers and deviations

The policy waiver or deviation procedure is described in Chapter 5 of the *Internal Control Binding Principles*. All approved waivers and deviations must be registered in iRisk and should be part of the local annex.

## 1.8 Additional internal documentation

Other related internal control documentation may be found in the policy house. Links to local internal control documentation may also be found in the policy house.

## 2. Obligations

**Employees** and ING Entities must comply with the obligations described in this chapter. We live in a time when public and societal expectations can quickly shift from the acceptable to the not acceptable (or vice versa). Building future-proof and resilient obligations on **concern** reporting has become a business necessity next to a legal obligation.

How **concerns** are handled has a significant impact on keeping the bank safe and compliant. Carefully dealing with **concerns** includes the following steps:

- (i) **Concern** reporting;
- (ii) Follow-up including **investigation** if and when needed;
- (iii) Consequence management;
- (iv) **After care**.

**Obligation 1: Ensure the necessary preconditions are in place for encouraging concern reporting and ensuring access to raising concerns**

### (i) **Concern reporting**

ING is working towards a culture that nurtures speak up, listen up and follow-up and where there is a widespread willingness to raise **concerns**. The ultimate goal is to normalise the early de-escalation of (suspected) problems. Because of this, there needs to be careful management of **concerns**.

Any persons with a **concern** are encouraged to raise their **concern** and not keep it to themselves or ignore it. Raising **concerns** with **reasonable grounds** should be safe and without fear of any **retaliation**.

ING encourages and protects **reporters** who come forward and report **concerns**. **Senior management** must ensure low-threshold access to report **concerns** on **reasonable grounds** following these criteria:

- Access to an ING **WBRO** or the **(anonymous) reporting platform**. There are no repercussions for reporting a **concern** with **reasonable grounds**, even if it turns out to be unfounded;
- The **reporter rights**, including the **anonymity** of the **reporter** (when using the **anonymous** reporting platform), the **confidentiality** of the **reporter's** identity and details of the **concern** are respected and protected. For exceptions to the **confidentiality** principle, see Appendix B;
- **Reporters** of **concerns** always retain the right to disclose the facts discussed during an internal **investigation** to the appropriate local authorities, their family members and/or mental health professionals;
- **Senior management** must provide insights into local external official channels that may exist outside of ING (Public Disclosure), including the conditions under which a **reporter** is protected in making such a disclosure;
- **Senior management** must protect **reporters** who report **concerns** with **reasonable grounds** from suffering any **retaliation**;
- ING does not tolerate any forms of **retaliation** and any **employee**, including (senior) management, is strictly prohibited from retaliating against a **reporter** or against anyone providing information or who otherwise assists in an **investigation**. Disciplinary action will apply against confirmed retaliators and depending on local legislation criminal and/or civil liability may apply outside of ING. Utmost efforts must be made to protect the following individuals from **retaliation**:
  - the **reporter** who reports a **concern** with **reasonable grounds**;
  - any person who provides information with **reasonable grounds**; and
  - any person who otherwise assists in an **investigation**; and

- any person who assists the **reporter** in the reporting process (such as an ING **WBRO**, trusted advisor, colleagues or relatives of the **reporter** who are also in a work-related connection with ING).

## Obligation 2: Ensure the careful follow up of concerns with clear governance

### (ii) Follow-up including investigation

Alerting management to **concerns** is key to increase the likelihood of taking appropriate and adequate action on substantiated **concerns** which may lead to impairment of ING's integrity, financial loss, regulatory sanctions and/or reputational damage. In order to guarantee carefully dealing with **concerns** **Senior management** must ensure:

- Sufficient mechanisms are in place so that reported **concerns** are followed up promptly, recorded and retained following the global standardized process and in accordance with applicable laws, regulations, policies and procedures.
- That reported **concerns** are followed up on timely and thoroughly, with the appropriate investigative expertise and resources. **Investigations** must be executed by a professional and an independent investigator/investigative unit based on the Global Investigations Charter that ensures proportionality and subsidiarity<sup>1</sup>;
- That mechanisms are in place so that the data of the **reporter** and/or the data subjects involved in the investigations is properly recorded and/or retained and destroyed in conformity with applicable laws, regulations, policies and procedures e.g. regarding data protection and privacy restrictions;
- That all **reporters** as well as alleged subjects of **concerns** have a right to a careful and fair **whistleblowing** process. This should be safeguarded and, when necessary, restorative action should be ensured;
- Sufficient oversight on signals and trends gathered from reports to all existing formal ING channels.

## Obligation 3: Apply fair consequence management

### (iii) Consequence management

Although an **investigation** can lead to a **concern** not being substantiated, proportionate consequences should be applied for substantiated **concerns**, taking into account the aggravating and mitigating circumstances. The process of consequence management of **concerns** needs to:

- Ensure the existence and application of different degrees of consequences that are proportionate to the severity/seriousness of **concerns**;
- Ensure uniformity across the board in terms of equal treatment;

After conclusion of an **investigation** into a **concern**, a Resolution Committee must be established to ensure a balanced, independent and objective resolution.

<sup>1</sup> See Global Investigations Charter

#### Obligation 4: Provide post-reporting closure

##### (iv) After care

After the conclusion of the **investigation**, **after care** needs to be given to the relevant impacted parties where substantiated **concern** has taken place. Questions that impacted parties may have, and which could not be answered during the **investigation** – due to privacy or investigative interests – can now be addressed within the boundaries of privacy and **confidentiality**. For example, teams are sometimes left with questions when a colleague is dismissed, which would need to be addressed in a sensitive and thought-out manner.

In case of an **investigation** leading to the reported **concern** being unsubstantiated, and the alleged **subject of concern** experiencing reputational harm, efforts on restorative action should be considered and documented.

### 3. Risks & Control Objectives

The following table links the obligations to the standard risk definition(s) and provides one or more control objectives to mitigate risks that are outside ING's Risk Appetite.

In the Non-Financial Risk Taxonomy there exists a Level 1 Conduct Risk. Underneath, there exists a Level 2 risk called 'Culture & Ethics'. Under it, a Level 3 Whistleblowing risk is attached. For more information on scope and risk management, please see the Global Whistleblower page.

#### L2 Risk Description

The risk of financial loss, regulatory fines and reputational damage due to events related to our risk culture, meaning our norms, attitudes and behaviours related to risk awareness, risk-taking and risk management, and the controls that shape our decisions on risks.

Risks and Obligations	Control objective
<p><b>1</b> <b>Risk</b> of breaches of the values, behaviours and principles in the Orange Code, the Global Code of Conduct, laws and regulations, and principles in ING policies as a consequence of not carefully dealing with <b>concerns</b>.</p> <p>(Related obligations from chapter 2: 1,2,3,4)</p>	<p><b>A</b></p> <ul style="list-style-type: none"> <li>I. <b>Anonymous</b> and easy access for every <b>employee</b> to a local <b>ING Whistleblower Reporting Officer</b> and/or an <b>anonymous</b> reporting option</li> <li>II. Actions are taken by <b>senior management</b> to create sufficient psychological safety for <b>employees</b> to raise <b>concerns</b> and measure levels of confidence of <b>employees</b> to report <b>concerns</b> (e.g. <b>After care</b>, awareness messages, surveys)</li> <li>III. The Follow-up and protection process on reported <b>concerns</b> is defined, implemented and followed in line with the Orange Code and applicable ING Policies, laws and regulations</li> <li>IV. <b>Senior management</b> mandates a Resolution Committee to ensure carefully weighted consequences</li> </ul>
<p><b>2</b> <b>Risk</b> of breaches of the values, behaviours and principles in the Orange Code, the Global Code of Conduct, laws and regulations, and principles in ING policies as a consequence of <b>employees</b> not being aware of the Whistleblower Policy.</p>	<p><b>B</b> <b>Employees</b> understand and are aware<sup>1</sup> of the Whistleblower Policy which encourages them to raise <b>concerns</b> with <b>reasonable grounds</b>.</p>

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

## 4. 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 <b>concerns</b> people, processes, information, technology, facilities and all data.
<b>Global Code of Conduct</b>	The Global Code of Conduct contains 10 principles all ING <b>employees</b> should abide by. They are high level obligations which link to all ING's non-financial risk Policies.
<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 Event Management Procedure</b>	The Event Management Procedure outlines the processes for the management of operational risk events, as well as the roles and responsibilities for limiting the consequences of such identified events and their related reporting.
<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>Internal Control Binding Principles</b>	Internal Control Binding Principles describe the development process for Global Policies and Control Standards. It sets content and approval requirements for all Policy House documents - for Financial, Model, and Non-Financial Risk.
<b>Global Event Management 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>Global Investigation Charter</b>	The Global Investigation Charter specifies how the <b>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 Central Special Investigations department.

**Orange Code**

The Orange Code sets the standards on the values and behaviours ING aspires for, towards fulfilling the Orange Code Promise of Integrity above all by balancing the rights and interests of ING's stakeholders.

**Whistleblower Control Standard**

The Policy obligations and control objectives are translated into a control defined in the Control Standard to ensure compliance with the Whistleblower Policy.

**Whistleblowing Procedure**

The Global Whistleblowing Procedure supports the Whistleblower Policy. The Procedure describes the **concern** Reporting and **Investigation** steps, it includes a process flow and gives detailed directions to **employees, senior management and ING WBROs**.

## Appendix A Defined terms

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<b>After care</b>	<b>After care</b> is about (senior) management providing closure within the organization in a way that respects <b>anonymity</b> and <b>confidentiality</b> , specifically in the case where <b>concerns</b> were substantiated. <b>After care</b> can take many forms (e.g. lessons learned, retrospectives, training & awareness), and should be done in close cooperation with HR as it is key to ensure and create the understanding that ING takes <b>concerns</b> seriously and takes subsequent proportionate actions.
<b>Anonymous(ly)/ Anonymity</b>	The unknown identity of the <b>reporter</b> . A <b>reporter</b> is <b>anonymous</b> when his/her identity is not known to any <b>Employee</b> (including the ING <b>Whistleblower Reporting Officers</b> and <b>Authorised persons</b> ) and the <b>Anonymous Reporting Platform</b> .
<b>Anonymous reporting platform</b>	A channel through which <b>reporters</b> can report a <b>concern anonymously</b> or by disclosing his/her identity. This <b>reporter</b> channel, provided by an independent external party, allows <b>reporters</b> to report <b>concerns</b> by using e-mail, phone or the website of the provider. <b>Concerns</b> reported to this line are still cascaded to ING for internal investigations.
<b>Audit Committee</b>	The <b>Audit Committee</b> (AC) shall assist the Supervisory Board with the performance of its duties in relation to the integrity and quality of the Company's financial reporting and the effectiveness of the Company's internal risk management and control systems in relation to financial reporting and shall prepare the discussions within and the decisions of the Supervisory Board on such matters. See also the Charter of the Supervisory Board of ING Groep N.V. and ING Bank N.V..
<b>Authorised persons</b>	These are persons who are strictly necessary for the handling and/or investigation of the <b>reporter's concern</b> . The ING <b>Whistleblower Reporting Officer</b> determines the persons who are/become Authorised Person. <b>Authorised persons</b> (could) include: <ul style="list-style-type: none"><li>• ING <b>Whistleblower Reporting Officers</b> (systematic);</li><li>• <b>Corporate Advisory Team</b> members (ad hoc);</li><li>• Chief Compliance Officer delegated persons (ad hoc);</li></ul> Representatives of (ad hoc): <ul style="list-style-type: none"><li>• Risk Culture and Behavioural Risk;</li><li>• Human Resources department;</li><li>• Central Special investigations or local Special investigation Functions;</li><li>• Internal Audit department;</li><li>• Legal department;</li><li>• Compliance department</li><li>• External consultants (e.g. lawyers) or investigators (ad hoc).</li></ul>
<b>Confidential(ity)</b>	This refers to the non-disclosure of certain information such as the identity of the <b>reporter</b> , the content of the <b>concern</b> as well as any other details related to the <b>concern</b> and any investigation of the <b>concern</b> . This also includes any information that relates to the identity of the <b>reporter</b> . Information is only shared with <b>Authorised persons</b> and only on a strict 'need to know' basis.

<b>Concern(s)</b>	<p>A situation raised by a <b>reporter</b> 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:</p> <ul style="list-style-type: none"> <li>• the Orange Code (such as unnecessarily harming the rights of stakeholders); and/or</li> <li>• any ING Policy; and/or</li> <li>• any law and regulation (including codes, e.g. the Dutch Banking Code).</li> </ul>
<b>Corporate Advisory Team</b>	<p>Supports the ING <b>Whistleblower Reporting Officers</b> and consists of representatives of:</p> <ul style="list-style-type: none"> <li>• Human Resources Legal;</li> <li>• Central Special investigations (CSI);</li> <li>• Group Legal/ General Legal Affairs; and</li> <li>• Group Compliance;</li> <li>• Group Compliance Head of Conduct Compliance &amp; Ethics (<b>Corporate Advisory Team</b> Chair); and</li> <li>• Secretary (to be assigned by <b>Corporate Advisory Team</b> Chair).</li> </ul> <p>The <b>Corporate Advisory Team</b> will appoint a single point of contact for the ING <b>Whistleblower Reporting Officers</b>.</p>
<b>Employee(s)</b>	<p>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, paid and unpaid interns, volunteers or trainees, and persons hired as external <b>employees</b>, including self-employed workers.</p>
<b>Investigation</b>	<p>The <b>investigation</b> following the intake and <b>review</b>. The <b>investigation</b> will be conducted by the relevant <b>investigations</b> unit and/or by any external party as appointed by the relevant unit and in accordance with applicable policies and charters. (See Global Whistleblowing Procedure for more detailed information.) The <b>investigation</b> and the case resolution will be carried out according to the <i>Global investigation Charter</i>.</p>
<b>Reasonable grounds</b>	<p><b>Reasonable grounds</b> means to believe, in light of the circumstances and the information available to the <b>reporter</b> at the time of reporting, that the matters reported by them are true. Those who deliberately and knowingly reported wrong or misleading information do not enjoy protection under the ING policy. Protection is not lost if inaccurate information was reported by honest mistake. Of course, there are no repercussions for reporting a <b>concern</b> in good faith, even if their <b>concern</b> turns out to be unsubstantiated.</p>
<b>Review</b>	<p>If the reported <b>concern</b> is in scope of the Whistleblower 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 an <b>investigation</b> or other follow up (for example, introducing process changes, training and awareness, conversations with impacted parties). (See Global Whistleblowing Procedure for more detailed information.)</p>
<b>Reporter(s)</b>	<p>Any person is eligible for protection as a <b>reporter</b> under this Whistleblower Policy when they report a <b>concern</b> in the context of their work-related activities with <b>reasonable grounds</b>. These individuals include <b>employees</b>, former <b>employees</b>, candidates, and parties with whom ING has a business relationship (such as contractors, subcontractors and suppliers).</p>

<b>Reporter rights</b>	<p><b>Reporter rights</b> include (see Whistleblowing Procedure for further details):</p> <ul style="list-style-type: none"> <li>• Protection against <b>retaliation</b>;</li> <li>• Information on and access to the reporting process;</li> <li>• Advice on the reporting process and implications;</li> <li>• <b>(Anonymously)</b> reporting a <b>concern</b>;</li> <li>• <b>Confidentiality</b> of identity and <b>concern</b>;</li> <li>• Staying informed;</li> <li>• Obtaining external advice;</li> <li>• Escalation;</li> <li>• Recording and retention.</li> </ul>
<b>Retaliation</b>	<p>This is any adverse action including threats or attempts taken against a <b>reporter</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 the <b>investigation</b>.</p> <p>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.</p>
<b>Risk Committee</b>	<p>The <b>Risk Committee</b> (RiCo) shall assist the Supervisory Board with the performance of its duties in relation to overseeing (i) the setting and monitoring of the Company's risk appetite and risk strategy for all types of risk including but not limited to financial, non-financial and compliance risk, (ii) the effectiveness of the internal risk management and control systems and (iii) other related risk management topics. The <b>Risk Committee</b> shall prepare the discussions within and decisions of the Supervisory Board on such matters. See also the Charter of the Supervisory Board of ING Groep N.V. and ING Bank N.V..</p>
<b>Senior management</b>	<p>Those <b>employees</b> holding level 0 - 2 management positions and/or regional and country management team members who are individually or jointly responsible for the decision-making, general operation and administration of legal entities, business lines, departments, or similar.</p>
<b>Subject of concern</b>	<p>A natural or legal person who is referred to in the <b>concern</b> as a person to whom the <b>concern</b> is attributed to or with whom that person is associated.</p>
<b>Third parties</b>	<p>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.</p>
<b>Undesirable behaviour</b>	<p>Behaviours include aggression and violence, bullying, discrimination, harassment, <b>retaliation</b> and sexual harassment. See Global Whistleblowing Procedure for detailed definitions of sub-categories.</p>
<b>Whistleblower Reporting Officer(s) (WBRO)</b>	<p>An <b>employee</b>, who has been appointed to manage <b>reporter concerns 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.</p>

## Appendix B Exceptions to the confidentiality principle

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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 **reporter** who has not reported **anonymously** is only known to the ING **WBRO** 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 **reporter**; and/or
  - ING is legally obliged to disclose a **reporter'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**  
If ING decides to disclose information to relevant regulatory or criminal **investigations** authorities, the **confidentiality** of the **reporter's** identity is fully respected, unless ING is legally obliged to disclose a **reporter'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 **reporter** or the ING **WBRO** receiving the **concern** must report the matter to the General Counsel and the chairman of the **Audit Committee** and to the ING Group **WBRO**. Any commissioned **investigation** will follow the Global Investigations Charter (chapter 2.5)

## 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 **reporter** or the ING **WBRO** receiving the **concern**, must report the matter to the chairman of the Supervisory Board of ING Groep N.V. and to the ING Group **WBRO**.
- In the event that the **concern** relates to the chairman of the Supervisory Board of ING Groep N.V., the ING **WBRO** 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.
- Any commissioned **investigation** will follow the Global Investigations Charter (chapter 2.5)

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 **reporter** or the ING **WBRO** receiving the **concern**, must report the matter to the chairman of the Supervisory Board of ING Bank N.V. and to the ING Group **WBRO**.
- In the event that the **concern** relates to the chairman of the Supervisory Board of ING Bank N.V., the ING **WBRO** 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.
- Any commissioned **investigation** will follow the Global Investigations Charter (chapter 2.5)

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

- In the event that the **concern** relates to an ING **WBRO** or a Compliance Officer, or there is a (suspicion of) conflicting interests, the **reporter** must report the **concern** to the next higher level ING **WBRO**.
- In the event that the **concern** relates to the Chief Compliance Officer, the **reporter** or the ING **WBRO** receiving the **concern** must report the **concern** to the ING Group **WBRO**.
- In the event that the **concern** relates to the ING Group **WBRO** or in the event that the Chief Compliance Officer is the ING Group **WBRO**, the **reporter** or the ING **WBRO** receiving the **concern** must report the **concern** to the Chief Executive Officer and to the Chief Risk Officer of ING Groep N.V.