Risk Management

Investor Day 2019

Steven van Rijswijk, CRO

Frankfurt • 25 March 2019



Reputation and trust are paramount

Non-Financial Risk Framework

NFR Governance

Non-Financial Risk areas

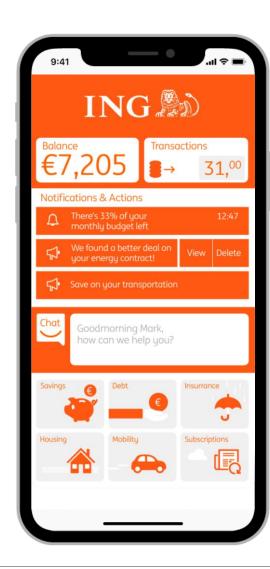
Compliance Risk Unauthorised Activity Risk

Control & Processing Risk Personal & Physical Security Risk

Employment Practice Risk Information (Technology) Risk

Internal Fraud Risk External Fraud Risk

Continuity Risk



Non-Financial Risk highlights

IT within risk appetite

Business Continuity Management Framework

Global E-Discovery tool developed to combat fraud Dedicated centres of expertise and shared service centres

NFR related reporting

Data Analytics & Robotics

Enterprise Risk Management Programme



Management of IT Risk

Business continuity & operational resilience Crisis Management Organisation (CMO) BCM Framework Disaster Recovery Plan (DRP) Business Continuity Plan (BCP)

- Away from a pure recovery strategy to a operational resilience strategy
- We prepare for and quarterly conduct scenario based testing of disruptive events

Cybercrime resilience



ING regularly withstands cyber attacks

- DDoS* prevention measures in place
- Periodical hackathon

Data & privacy protection



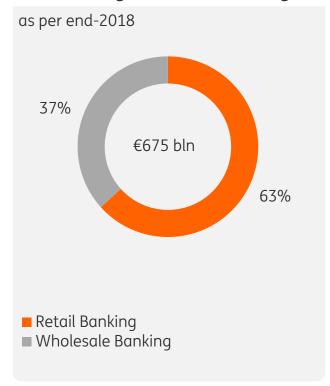
- Data and systems security is paramount
- Data leakage protection tools
- Monitoring capabilities strengthened



^{*} DDoS - Distributed Denial of Service

A lending-focused model with prudent credit risk management

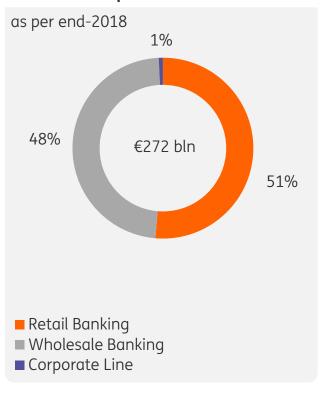
Total lending credit outstandings*



Total RWA



Credit RWA split



^{*} Lending credit outstanding is lending and money market credit outstandings, including guarantees and letters of credit, but excluding undrawn committed exposures (off-balance sheet positions). Going forward we would refer to Lending credit outstandings as "Lending", unless stated otherwise

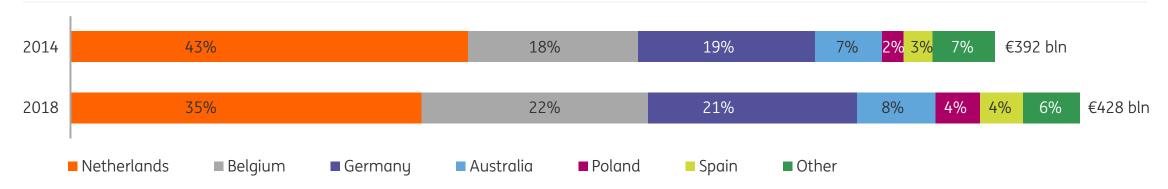


Retail lending overview

Residential mortgages remain significant part of our book



Retail lending across geographies



^{*} Includes €17 bln Bank Treasury and €15 bln of Other Retail lending as per end-2018



Credit Risk Management – Wholesale Banking



Continuously strengthening management of credit risk

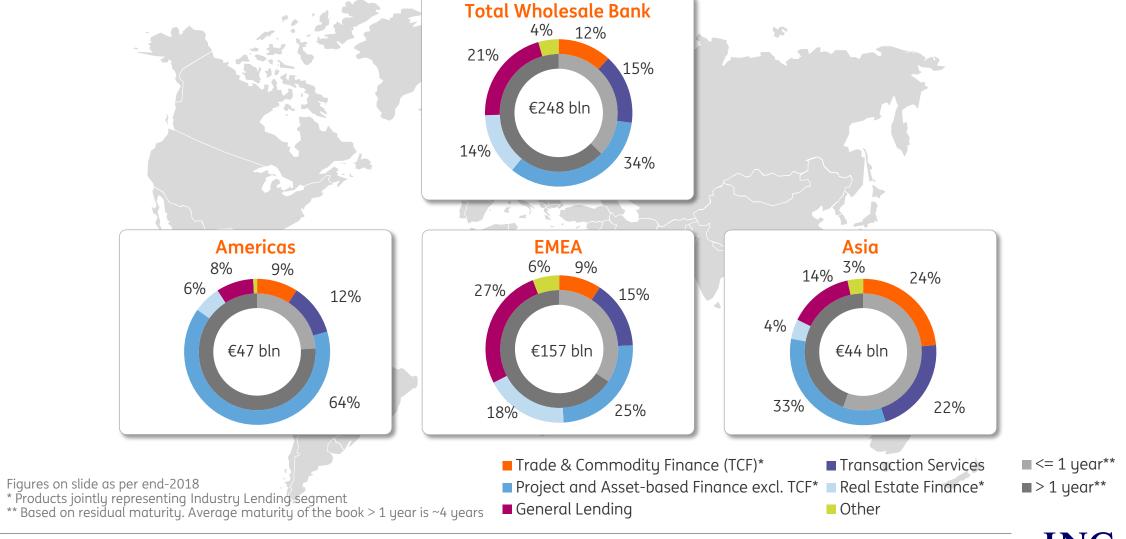
Strong risk management framework



^{*} REF - Real Estate Finance, RED - Real Estate Development, REIM - Real Estate Investment Management



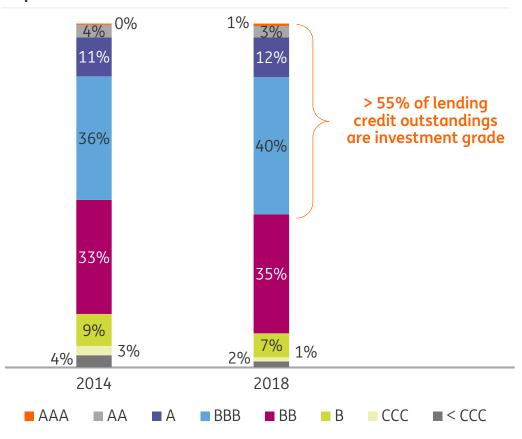
Well-diversified lending across our global franchise...



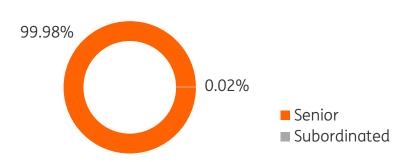


...with a clear focus on senior and secured deal structures

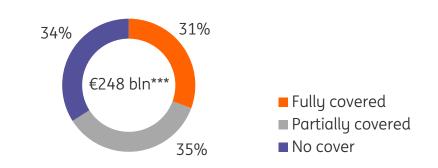
WB average internal counterparty rating distribution improved*



Nearly all lending is senior**



Lending cover percentages including guarantees received



Figures as per end-2018



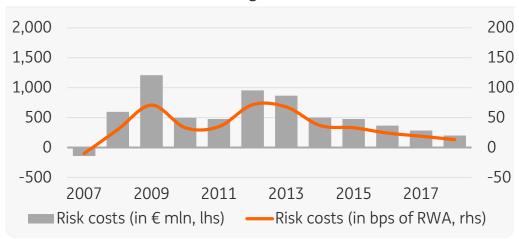
^{*} Éxcluding Bank Treasury

^{**} Lending is ING Group total loans and advances to customers

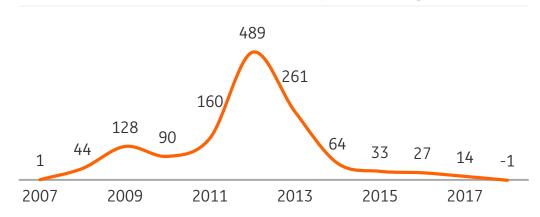
^{***} Cover pool value (€214 bln) exceeds total underlying loan amount (€163 bln or 66% of WB lending book) due to overcollateralisation

Wholesale Banking through-the-cycle risk costs

Risk costs Wholesale Banking



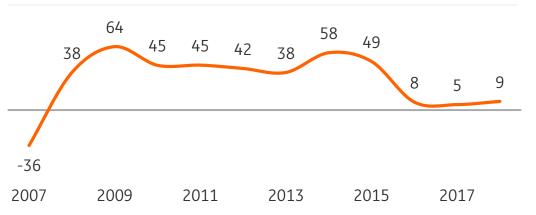
Risk costs Real Estate Finance (in bps of average RWA)



Risk costs Project & Asset-based Finance (in bps of average RWA)



Risk costs General Lending (in bps of average RWA)

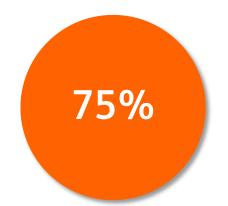


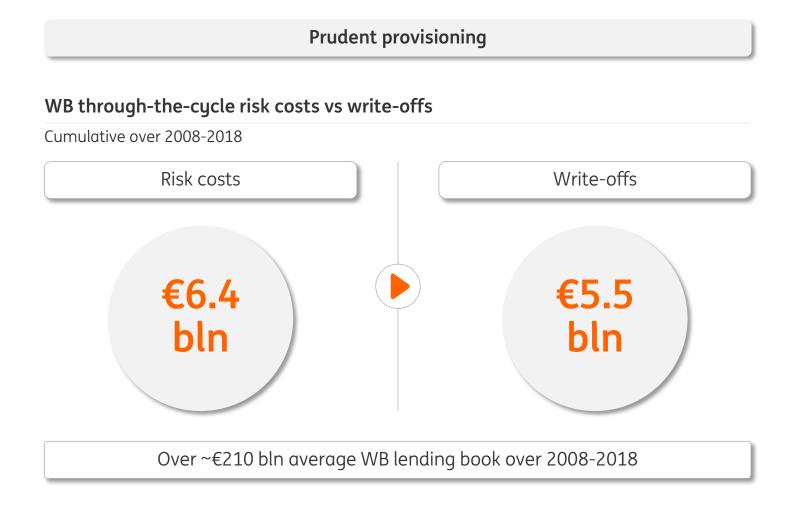


Proactive restructuring preserves value

Proactive restructuring

Global Credit Restructuring files with no losses







Leveraged finance book managed within a solid framework

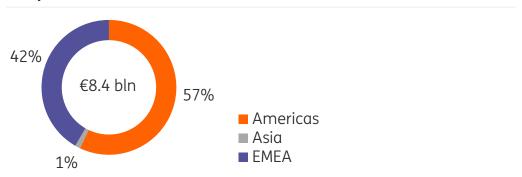
Business overview

- Focus on larger sponsors with an established track record and a good history of seeking to resolve issues in event of underperformance by the acquired business
- Mainly active in large developed markets
- Granular book of €8.4 bln as per end-2018 (average commitment of ~€25 mln) with a strong industry diversification
- Sell-down targets constantly monitored and met (on average ~40 days from mandate to allocation)
- Since 2007, significant reduction (45%) of the underwriting limit for leveraged finance transactions

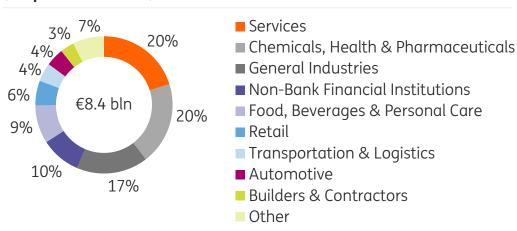
Main actions taken

- Global cap of €9.6 bln
- Maximum final take for single transaction ~€25 mln recently introduced
- Maximum leverage 6.5x
- No single underwrites

Leveraged finance book* focused on developed markets (as per end-2018)



Leveraged finance book* highly diversified by industry (as per end-2018)



^{*} Leveraged finance is defined as Private Equity driven leveraged finance with higher than 4x leverage. Leveraged finance book is total commitments (i.e. including undrawn)

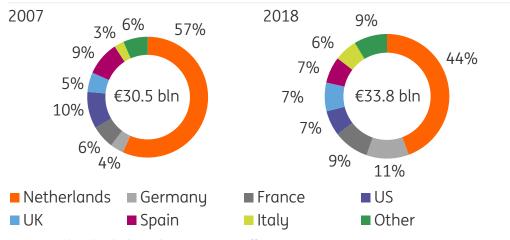


Real Estate Finance diversified and de-risked

Main actions taken

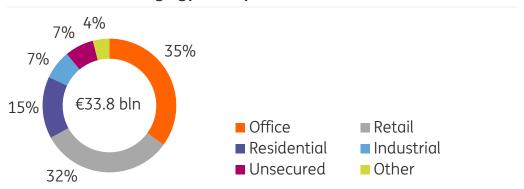
- REF exposure limit tightened in 2018
- Geographical concentration to the Netherlands reduced
- Portfolio substantially de-risked as evidenced by reduction in LTV (average 53%) and the discontinuation of Real Estate Development
- Increased focus on Originate-to-Distribute

Lending concentration in the Netherlands decreased since 2007*

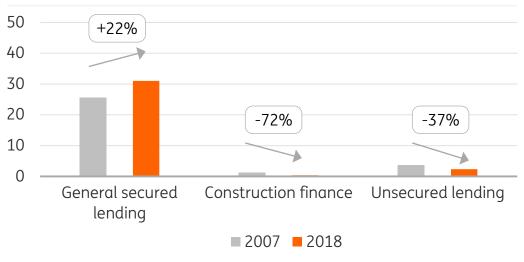


^{*} Geographical split based on initiating office

REF breakdown by type (as per end-2018)



Construction finance and unsecured lending further reduced (in € bln)





Oil & Gas book structured to withstand adverse market conditions

Business overview

- We lend to operating companies, keeping a senior position versus other creditors
- €4.3 bln directly exposed to commodity price risk

Main actions taken

Caps introduced for:

- Offshore drilling (exposure halved since 2015)
- Reserve Based Lending at regional level

Trade Finance

 Short term selfliquidating trade finance, generally for major trading companies, either pre-sold or price-hedged

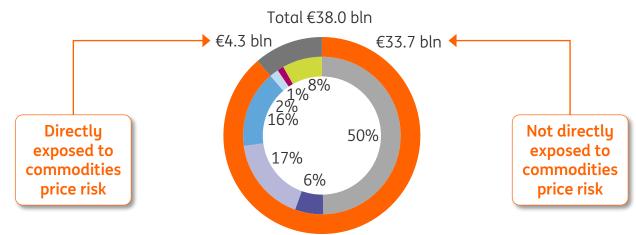
Export Finance

 ECA-covered loans in oil & gas sector: typically 95% -100% credit insured

Corporate Lending

 Predominantly loans to investment grade large integrated oil & gas companies

Lending credit outstandings by asset type



Industry Lending: Midstream

 These assets typically generate revenues from long-term tariff based contracts, not affected by oil & gas price movements

Industry Lending: Other Offshore Services Companies

 Directly impacted by oil & gas markets

Industry Lending: Offshore Drilling Companies

 Directly impacted by oil & gas markets

Industry Lending: Reserve Based Lending

- Smaller independent oil & gas producers directly exposed to oil & gas price risk
- Focus on first cost quartile producers



A secured lender in shipping focused on selected clients

Business overview

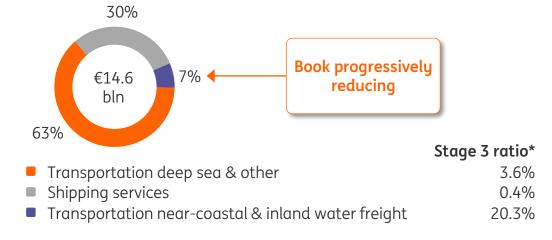
- Not a traditional ship finance mortgage lender
- Secured corporate lender
- Recourse to a corporate balance sheet
- Long-term client relationships with companies with clear strategies, appropriate capital structures and access to liquidity
- Focus on modern tonnage in commoditised asset classes with active secondary markets
- Legacy short sea portfolio reducing in a balanced way via vessel sales as opportunities arise
- Geopolitical factors (trade war), economic transition in China, the commodity cycle and shipping supply will continue to be key drivers

Main actions taken

Near-costal & inland water freight book:

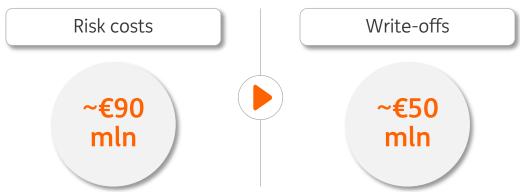
- Stop new transactions
- Progressively reduce exposure

Shipping lending by asset type (as per end-2018)



Deep sea shipping through-the-cycle (in € mln)

Cumulative over 2008-2018





^{*} As per end-2018

Important legal information

ING Group's annual accounts are prepared in accordance with International Financial Reporting Standards as adopted by the European Union ('IFRS-EU'). In preparing the financial information in this document, except as described otherwise, the same accounting principles are applied as in the 2018 ING Group consolidated annual accounts. All figures in this document are unaudited. Small differences are possible in the tables due to rounding. Certain of the statements contained herein are not historical facts, including, without limitation, certain statements made of future expectations and other forward-looking statements that are based on management's current views and assumptions and involve known and unknown risks and uncertainties that could cause actual results, performance or events to differ materially from those expressed or implied in such statements. Actual results, performance or events may differ materially from those in such statements due to a number of factors, including, without limitation: (1) changes in general economic conditions, in particular economic conditions in ING's core markets, (2) changes in performance of financial markets, including developing markets, (3) potential consequences of the United Kingdom leaving the European Union or a break-up of the euro, (4) changes in the fiscal position and the future economic performance of the US including potential consequences of a downgrade of the sovereign credit rating of the US government, (5) potential consequences of a European sovereign debt crisis, (6) changes in the availability of, and costs associated with, sources of liquidity such as interbank funding, (7) changes in conditions in the credit and capital markets generally, including changes in borrower and counterparty creditworthiness, (8) changes affecting interest rate levels, (9) inflation and deflation in our principal markets, (10) changes affecting currency exchange rates, (11) changes in investor and customer behaviour, (12) changes in general competitive factors, (13) changes in or discontinuation of 'benchmark' indices, (14) changes in laws and regulations and the interpretation and application thereof, (15) changes in compliance obligations including, but not limited to, those posed by the implementation of DAC6, (16) geopolitical risks, political instabilities and policies and actions of governmental and regulatory authorities, (17) changes in standards and interpretations under International Financial Reporting Standards (IFRS) and the application thereof, (18) conclusions with regard to purchase accounting assumptions and methodologies, and other changes in accounting assumptions and methodologies including changes in valuation of issued securities and credit market exposure, (19) changes in ownership that could affect the future availability to us of net operating loss, net capital and built-in loss carry forwards, (20) changes in credit ratings, (21) the outcome of current and future legal and regulatory proceedings, (22) operational risks, such as system disruptions or failures, breaches of security, cyber-attacks, human error, changes in operational practices or inadequate controls including in respect of third parties with which we do business, (23) risks and challenges related to cybercrime including the effects of cyber-attacks and changes in legislation and regulation related to cybersecurity and data privacy, (24) the inability to protect our intellectual property and infringement claims by third parties, (25) the inability to retain key personnel, (26) business, operational, regulatory, reputation and other risks in connection with climate change, (27) ING's ability to achieve its strategy, including projected operational synergies and cost-saving programmes and (28) the other risks and uncertainties detailed in this annual report of ING Groep N.V. (including the Risk Factors contained therein) and ING's more recent disclosures, including press releases, which are available on www.ING.com. (29) This document may contain inactive textual addresses to internet websites operated by us and third parties. Reference to such websites is made for information purposes only, and information found at such websites is not incorporated by reference into this document. ING does not make any representation or warranty with respect to the accuracy or completeness of, or take any responsibility for, any information found at any websites operated by third parties. ING specifically disclaims any liability with respect to any information found at websites operated by third parties. ING cannot quarantee that websites operated by third parties remain available following the publication of this document, or that any information found at such websites will not change following the filing of this document. Many of those factors are beyond ING's control

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