

Pillar 3 - Capital Adequacy & Risk Disclosures

June 2023



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ING Bank Australia Limited (IBAL), trading as ING, is an Authorised Deposit-taking Institution subject to regulation by the Australian Prudential Regulation Authority (APRA) and is a part of ING Groep N.V.

In the Pillar 3 Report, “The Group” refers to IBAL and its controlled entities.

The following information is presented in accordance with the APRA Prudential Standard APS 330, ‘Public Disclosure’.

Effective 1 April 2018, the Group was accredited by APRA to determine its regulatory capital requirements using an internal market risk model and internal credit risk models for selected portfolios: the Group is approved to use the Advanced Internal Ratings-Based (AIRB) approach for the Residential Mortgages portfolio and the Foundation Internal Ratings-Based (FIRB) approach for the Bank & other financial institutions portfolio for regulatory capital purposes.

Effective 1 April 2020, the Group was accredited to apply the FIRB approach to its Corporate Lending portfolio, and the Supervisory Slotting approaches to calculate its capital requirements for its Project Finance portfolio and the majority of its Commercial Real Estate portfolio.

The initial disclosures herein reflect reporting requirements applicable to banks utilising the Internal Ratings-Based Approach (IRB) to capital measurement.

All credit exposures are located within Australia.

All credit exposures are managed in Sydney, Australia.

All amounts are stated in AUD.



Qualitative disclosures

Capital disclosures

The Group's capital management strategy aims to ensure adequate capital levels to protect deposit holders and to maximise shareholder returns. The Group's capital is measured and managed in line with Prudential Standards and minimum regulatory capital requirements for banks established by APRA¹ which are consistent with capital requirements legislation. APRA has set minimum ratios that compare the regulatory capital with risk weighted on and off-balance sheet assets for credit, operational and market risks as well as mandating a charge for other risks that may or may not be easily measured. The Group has been in compliance with the minimum capital requirements imposed by APRA throughout the year.

The Group chooses to hold capital in addition to prudential minimum levels by maintaining management buffers that are sufficient to absorb potential losses under stress scenarios of certain severities, and are forward-looking in the sense that they take into account future regulation changes including increased minimum capital requirements. The Internal Capital Adequacy Assessment Process (ICAAP) supports the Group's Capital Management Policy which defines the framework for defining, measuring, management, monitoring and governance of the Group's capital position. Further the Group applies a risk appetite framework with annually reviewed trigger and tolerance levels.

Capital planning is a dynamic process which involves various teams and covers internal capital target ratios, potential capital transactions as well as projected dividend pay-outs. The integral parts of capital planning comprise business operating plans, stress-testing, ICAAP along with considerations of (future) regulatory capital requirements, accounting changes, taxation rules and expectations of rating agencies.

The management buffers and capital plan are established on an annual basis and adjusted when significant events require so. The capital plan is aligned with management actions included in the 3 year business plan, which includes forecast growth in assets and earnings taking into account the Group's business strategies, projected market and economic environment, upcoming regulation changes and peer positioning. All the components of the capital plan are monitored throughout the year and are revised as appropriate.

The Board has set internal targets and risk appetite limits on top of the prudential requirements to manage the capital ratio. The calibration of the targets and risk appetite limits includes consideration of upholding regulatory requirements and commitments in times of stress.

Credit risk capital

In accordance with APRA's methodology, measuring credit risk requires one of a number of risk weights to be applied to each asset on the Balance Sheet and to off-Balance Sheet obligations. The risk weights are applied based on APRA's Internal Ratings-Based Approach for the Residential Mortgage book, Foundation IRB for Bank and Corporate Lending, Supervisory slotting for the Real Estate related wholesale and commercial property portfolios and the project finance activities. The Supervisory Formula Approach is applied to the relevant securitisation exposures while Credit Cards, Priority Commercial Mortgages, Personal Loans, Sovereigns and niche portfolios in Wholesale Banking apply the Standardised Approach.

Market risk capital

Under the Advanced Accreditation from APRA, risk-weighted assets for Market Risk are calculated using a set of approved models (Embedded Mark-to-Market loss or gain, Optionality & Historical Value-at-Risk) to quantify the potential risks associated with the interest rate risk in the banking book.

Based on this modelled output the Group holds sufficient capital to cover interest rate risk in the banking book. The Group measures this risk by ascribing a portion of the capital adequacy limit to cover the calculated change in economic value from adverse movements in interest rates. The Group has implemented buffer and trigger limit structures to ensure that sufficient capital is maintained to meet unexpected changes in the risk profile of the Group resulting from short term movements in market interest rates.

Operational risk capital

Risk-weighted assets for operational risk are calculated under the Standardised Approach based on business indicators, which is a financial-statement-based proxy of the Groups operational risk exposure.

Non-financial risks

As an ADI, the Group is subject to a range of non-financial risks. Examples are operational risk, business risk, compliance risk, conduct risk, reputation risk, and risk arising from work place, health, and safety. Such risks are managed under a "Non-Financial Risk Governance Framework" and have dedicated training and culture programs tailored to appropriate (risk) behaviour throughout the company. The implementation of the Banking Executive Accountability Regime (BEAR) ensures that the preventive and remedial behaviours directed by the (executive) risk owners are associated with the day-to-day working of the business. Long term thinking and behaviour is rewarded via the remuneration structure. Other than operational risk, non-financial risks are not subject to specific capital requirements.

¹ APRA capital framework builds on the pillars Prudential Capital Requirement, Capital Conservation Buffer and Counter Cyclical Buffer (CCyB). The CCyB relates to exposure to counterparties in jurisdictions where a CCyB applies, including 1% for Australia. ING Australia has limited exposures in non-Australian jurisdictions, resulting in a ~0.99% CCyB. Given the small difference, ING Australia decided to apply a 1% CCyB



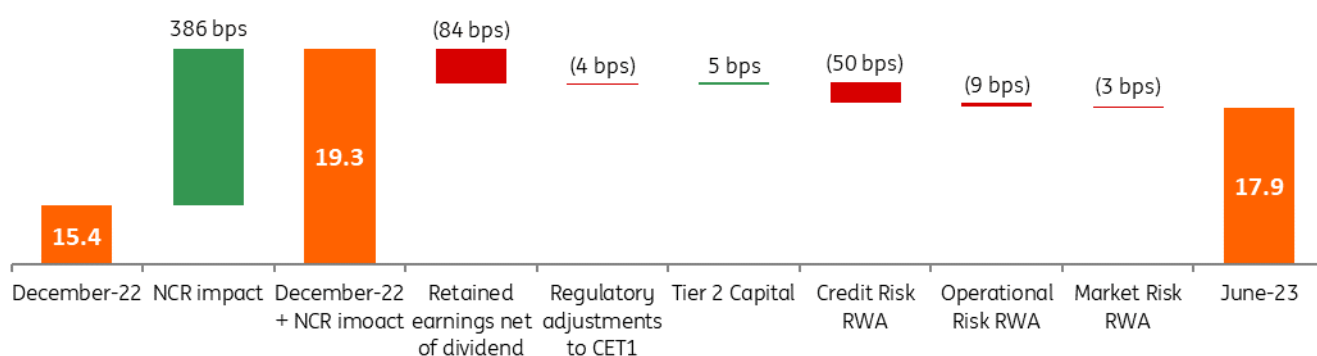
Capital summary

The Group's total capital ratio was 17.9% at 30 June 2023, increasing by 243 basis points from 31 December 2022.

Capital movements are attributable to the following:

- The impact of the New Capital Reform (NCR) effective from January 2023, which significantly decreased both the Credit Risk RWA by ~\$5b and the Operational Risk RWA by ~\$2b due to the new calculation requirements (386 bps);
- A decrease from earnings and gains on cash flow hedge of \$299m offset by dividend declared of \$588m in March 2023 (-84 bps);
- An increase of Credit Risk RWA to \$24,609m (-50 bps);
- An increase in Operational Risk RWA of \$140m (-9 bps) is driven by growth of the business indicators; and
- An increase in Market Risk RWA of \$42m (-3 bps), due to movements in the Embedded Loss (Gain) in the banking book and in the Repricing and Yield Curve Risk.

Figure 1: Total Capital movement (in %)

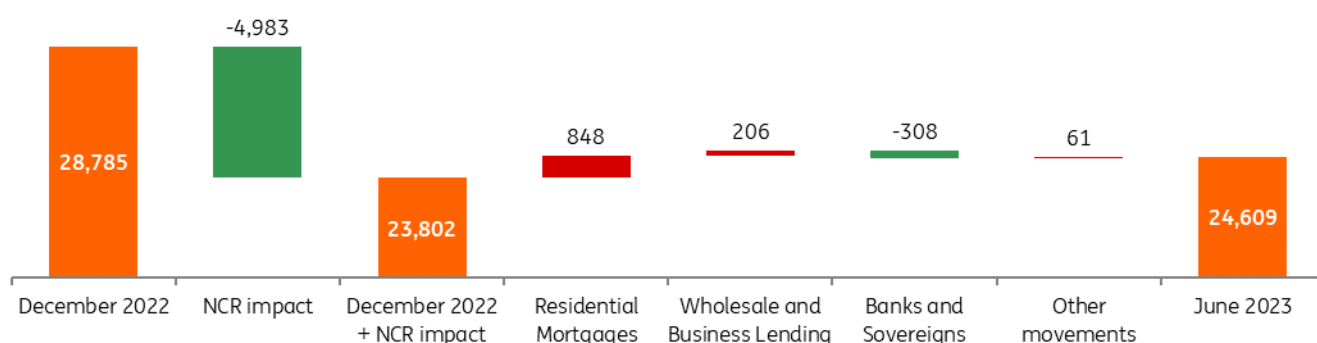


Credit Risk-Weighted Assets (CRWA)

The decrease in CRWA is explained by the following:

- The impact of the New Capital Reform decreased CRWA due to the new calculation requirements and new IRB models.
- Growth in the Residential Mortgages portfolio.
- Growth in the Wholesale and Business Lending portfolios.
- Reduction in the Banks and Sovereigns portfolios.

Figure 2: Credit Risk-Weighted Assets movement (in \$m)



Risk disclosures

Risk types

The following table explains the nature and extent of risks arising from financial instruments and how these risks could affect the Group's financial performance. The Group's major risk categories are detailed below.

Risk	Exposure arising from	Measurement	Key Governance
Credit Risk	<ul style="list-style-type: none"> Cash and cash equivalents Due from other financial institutions Loans and advances Derivative financial instruments Financial assets at FVOCI Securities at amortised cost Undrawn loan commitments Bank accepted guarantees 	<ul style="list-style-type: none"> Aging analysis Credit ratings Arrears analysis Internal ratings models Stress testing Financial analysis Covenant measures Loan to Value Loan to Income serviceability IFRS 9 Staging movements Loan Loss Provision coverage movements 	<ul style="list-style-type: none"> Risk Management Approach Risk Strategy Risk Appetite Statement Credit Risk Framework Policy Retail Credit Risk (RCR) Policy Wholesale Banking and Group Treasury Credit Policy Commercial Real Estate (CRE) Credit Policy Large Exposure and Related Entity (LEREP) Policy Small and Medium Enterprise (SME) Credit Policy Watch List Sub-Committee Charter (Wholesale Banking and Business Lending) Definition of Default (DoD) Policy Loan Loss Provisioning (LLP) Policy Problem Loan Management (PLM) (Non-Retail)
Market Risk – Interest Rate Risk	<ul style="list-style-type: none"> Loans and advances Deposits and other borrowings Financial assets at FVOCI Securities at amortised cost Debt issuances 	<ul style="list-style-type: none"> Historical Value-at-Risk (HVaR) Net Present Value and Net Interest Income at Risk (NPVaR ; NIlaR) Interest Rate Risk in the Banking Book (IRRBB) stress testing Basis Point Value sensitivity 	<ul style="list-style-type: none"> Risk Management Approach Risk Strategy Risk Appetite Statement IRRBB Stress Testing Methodology IRRBB Minimum Standards Asset and Liability Management (ALM) Policy Funds Transfer Pricing (FtP) Policy
Market Risk – Foreign Exchange Risk	<ul style="list-style-type: none"> Financial assets and liabilities not denominated in Australian dollars 	<ul style="list-style-type: none"> Sensitivity analysis 	<ul style="list-style-type: none"> Risk Management Approach Risk Strategy Risk Appetite Statement Asset and Liability Management (ALM) Policy
Integrated Risk	<ul style="list-style-type: none"> Overarching risks in the balance sheet not specific to one risk type. 	<ul style="list-style-type: none"> Solvency risk Model risk 	<ul style="list-style-type: none"> Risk Management Approach Risk Strategy Risk Appetite Statement Internal Capital Adequacy Assessment Process (ICAAP) Policy Stress Testing policy Model risk management policy



Risk types (continued)

Risk	Exposure arising from	Measurement	Key Governance
Liquidity and funding risk	<ul style="list-style-type: none"> Deposits and other borrowings Debt issuances Undrawn loan commitments 	<ul style="list-style-type: none"> Scenario analysis and stress testing Liquidity Coverage Ratio (LCR) Net Stable Funding Ratio (NSFR) Behavioural models 	<ul style="list-style-type: none"> Risk Management Approach Risk Strategy Risk Appetite Statement Asset and Liability Management (ALM) Policy Securitisation Policy Contingency Capital and Funding Plan Retail Deposit Run Plan IBAL Group Treasury Policy Covered Bond Policy Funding and Liquidity Risk Minimum Standards Liquidity Stress Testing Methodology
Non-Financial Risk (i.e. operational, compliance and legal risk)	<ul style="list-style-type: none"> Inadequate or failed internal processes, people and systems Failure or perceived failure to comply with relevant laws, regulations, the Group's policies 	<ul style="list-style-type: none"> Risk and Control Self-Assessment Non-Financial Risk Score Incident reporting Scenario analysis Business Environment Analysis 	<ul style="list-style-type: none"> Risk Management Approach Risk Strategy Risk Appetite Statement ING Group Non-Financial Risk Framework ING Group Risk Mitigation and Issue Tracking Procedure ING Group Product Approval and Review (PARP) Policy & Minimum Standard with Local Annex ING Group Risk Identification and Assessment Procedure ING Group Key Control Testing Procedure ING Group Information and Technology Risk Policy with Local Annex ING Group Outsourcing Policy with Local Annex ING Group Fraud Management Policy and Minimum Standard Operational Risk Management (ORM) Policy Operational Event Management Procedure (Event Management Process) Anti-Money Laundering (AML) Counter Terrorism Financing (CTF) Compliance Program (Part A and B) Anti-Bribery and Corruption (ABC) Policy Compliance Framework and Chart Conflict of Interest and Market Abuse (COI-MA) Policy Customer Best Interest (CBI) Policy FATCA and CRS Policy Fit and Proper Policy Obligation Management Policy Whistleblower Protection and Reporting Policy



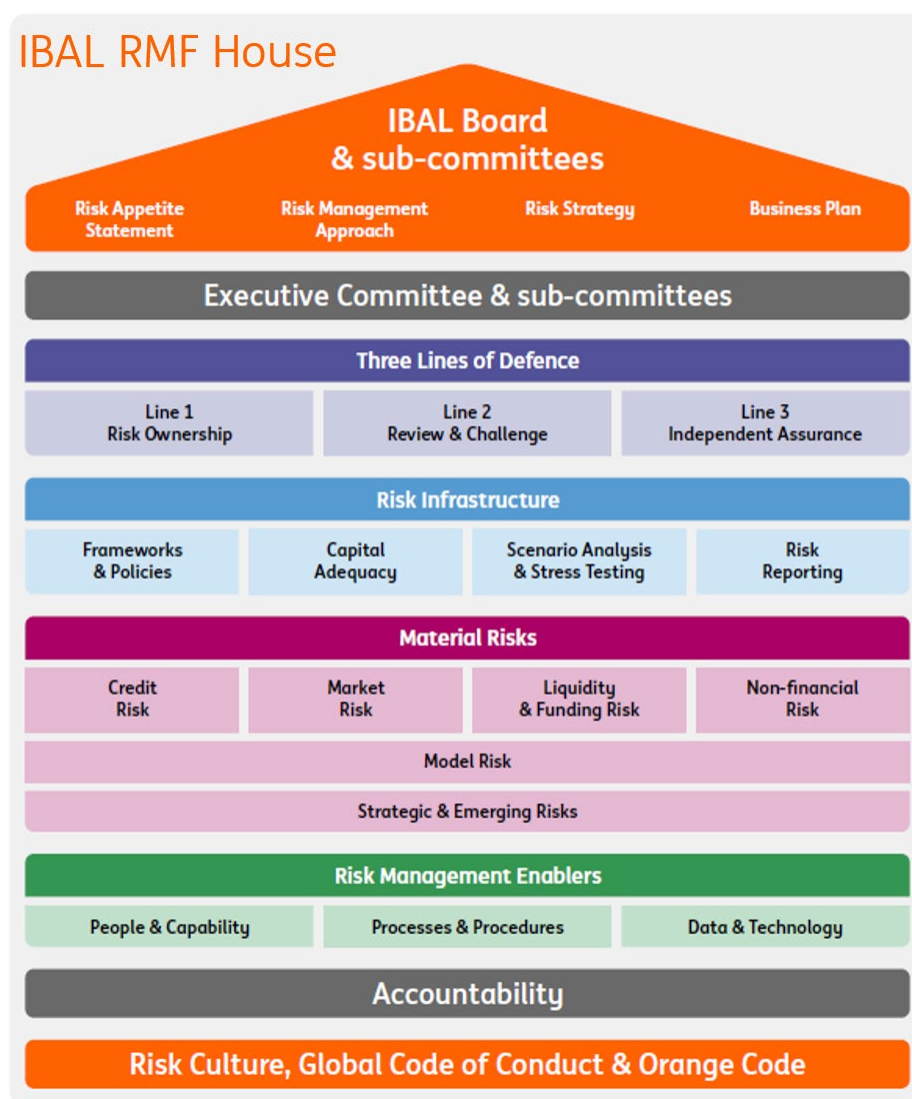
Risk Management Framework

Taking risk is inherent in the Group's business activities. To ensure prudent risk-taking across the organisation, the Group operates through a comprehensive Risk Management Framework (RMF) to ensure risks are identified, well understood, accurately measured, controlled and proactively managed at all levels of the organisation ensuring that the Group's financial strength is safeguarded. The Group's risk management framework incorporates the requirements of APRA's prudential standard CPS 220 Risk Management.

The key objectives of the Group's RMF are to ensure:

- the risk management objectives are linked to the Group's business strategy, ING Orange Code, Customer Golden Rules² and operations;
- all key risks are identified and appropriately managed by the risk owner;
- an appropriate risk culture and accountability framework are embedded across the organisation;
- systems, processes and tools are established to identify, monitor, manage and report on the key risks;
- the documentation for the risk management framework and supporting policies, procedures, tools and systems are kept accurate and current; and
- that the Group is compliant with all relevant legal and regulatory obligations, together with internal policy.

The key components that make up the Risk Management Framework are summarised in the diagram below, known as the "IBAL RMF House".



² The customer golden rules depict the principles on the interaction between ING and its customers throughout the customer life cycle.

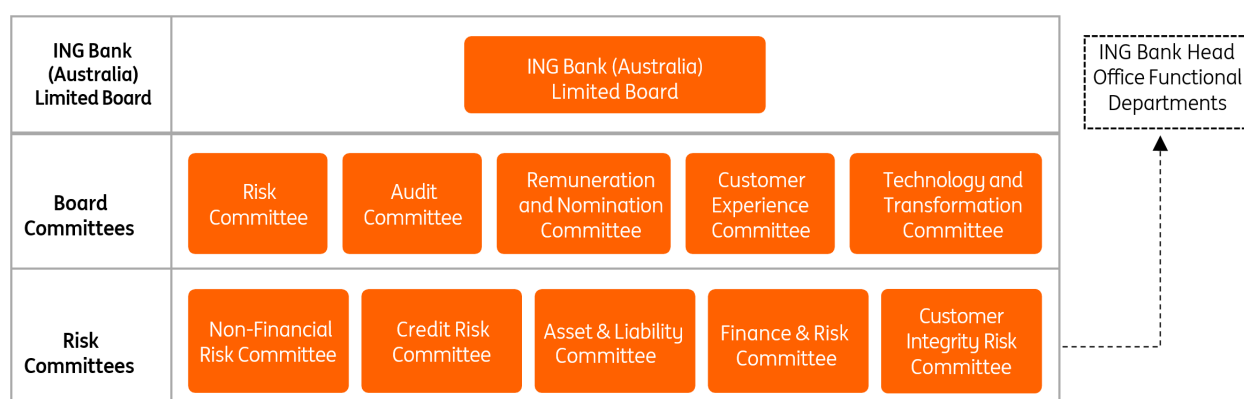


Risk Governance Framework

The Group regards risk management as a fundamental activity, performed at all levels of the organisation. Accountability in the risk management framework is based on the “three lines of defence” governance model. This approach reflects our belief that all employees have a role in identifying and managing risk and operating within the approved risk appetite. Each line of defence undertakes risk management activities that contribute to the effectiveness of the framework. The three lines of defence model is summarised as follows:

- Line 1 – Encompasses business line and support function employees and management. Line 1 is responsible for identifying and managing the risks that arise as a result of them carrying out their business activities.
- Line 2 - Risk Management provides oversight, advice, review and challenge of risk activities, ensuring Line 1 are managing risk in accordance with risk appetite and strategy.
- Line 3 – Corporate Audit Services (CAS) – Forms the 3rd Line and provides independent and objective assurance.

The Group's risk governance framework contains clear charters and mandates for the management of risk. Risk management in the Group is effected through a governance structure comprised of local, Board and Head Office committees. The governance structure is independent of the day to day management of the Group's business activities.



----- Functional Reporting Line

Role of the Board

The Board is responsible for the Group's RMF and oversight of its operation. This includes setting the risk appetite for management to operate within and approving key RMF documents including the Risk Appetite Statement, Risk Management Approach and Risk Strategy. As a subsidiary of ING Groep N.V., the Group is also subject to the governance and control of the parent company. The Board utilises five committees to discharge its responsibilities:

- *Risk Committee* – the Board Risk Committee provides objective non-executive oversight of the implementation and operation of the Group's risk management framework. A key purpose of the Risk Committee is to help formulate the Group's risk strategy and appetite for consideration and approval by the Board.
- *Audit Committee* – the Board Audit Committee assists the Board by providing an objective non-executive review of the effectiveness of the Group's financial reporting and risk management framework. This includes internal controls to deal with both the design and effectiveness and efficiency of significant business processes, which involve safeguarding of assets and the maintenance of proper accounting records.
- *Remuneration and Nomination Committee* – the Remuneration and Nomination Committee is responsible for reviewing and making recommendations to the Board on the Group's Remuneration Policy, and making recommendations in relation to remuneration of the Chief Executive Officer (“CEO”), director reports of the CEO, other persons whose activities may affect the financial soundness of the Group and those persons covered by the Remuneration Policy.
- *Customer Experience Committee* – the Customer Experience Committee is responsible for reviewing and monitoring customer experience with the Group, including customer complaints, resolution and closure of customer outcomes.
- *Technology and Transformation Committee* – the Technology and Transformation Committee is responsible for reviewing the Group's technology strategy and planning, including priorities, budgets, deliverables and operational plans. In addition, it oversees and monitors the Group's strategic transformation initiatives, including technology, data and business transformation.



Management Risk Committees

The Executive Committee (“ExCo”) is the peak Management Committee, ensuring management reporting is appropriate and fulsome to enable effective Board and Management oversight and decision-making. The risk committees described below act within the overall risk policy and delegated authorities granted by the Board. The committees have a governing role and ensure a close link between the business lines and the Risk Management functions through joint representation on each committee:

- Non-Financial Risk Committee (“NFRC”) oversees the non-financial risks such as operational risk and compliance. It monitors the execution of the Non-Financial Risk management framework and monitors and tracks the local Non-Financial Risk appetite. The NFRC acts as the Responsible Managers Committee to oversee and monitor the legal and compliance obligations of IBAL under its Australian Financial Services License (“AFSL”) and Australian Consumer Law (“ACL”) and acts as the product approval committee to oversee the execution of the local product approval and review process. The management of strategic risks and reputational risk is out of scope of the NFRC and belongs to the domain of ExCo.
- Credit Risk Committee (“CRC”) oversees the credit risk such as retail, business, wholesale banking and counterparty credit risk. The CRC monitors the credit risk management infrastructure of IBAL, including systems, processes, people and all IBAL credit risk policy manuals. The CRC monitors and tracks against the credit risk appetite limits. The CRC reviews broad credit issues, portfolio development and performance, arrears and default performance and provisioning.
- Asset and Liability Committee (“ALCO”) oversees the balance sheet risks such as interest rate risk, liquidity risk and foreign currency risk. ALCO is responsible for the asset and liability management of the local balance sheet and monitors local compliance with the ALCO Bank and IBAL Board risk appetite for IRRBB and funding & liquidity risk.
- The Finance and Risk Committee (“FRC”) oversees and monitors finance and risk decisions on internal and external reporting including impairment and loan loss provisioning. It also governs the compliance with Basel Pillar 2 and Pillar 3 reporting requirements. The FRC reviews capital management initiatives to maintain optimal allocation of capital, for making recommendations to the Board. The Committee does not get involved in any other aspect of the transactional approval process of any investment decision.
- The Customer Integrity Risk Committee (“CIRC”) serves as an escalation committee on Know Your Customer (“KYC”) matters such as the on or off-boarding of an individual client or pockets of clients, covers KYC related policy escalations, provides oversight of timeliness of off-boarding and monitors periodic and event driven reviews.

Risk Management Infrastructure and Enablers

The RMF is operationalised through key risk infrastructure such as frameworks and policies, capital adequacy assessments, stress testing and scenario analysis and risk reporting. This infrastructure supports the Group in identifying, managing and reporting our risks in a consistent way across throughout the organisation and define requirements that are binding on all business units.

The operationalisation of the RMF is supported by enablers that support our staff in executing risk management activities. These enablers include the use of risk data and technology to support the execution of activities, standardised processes and procedures aligned to risk policies, and the ongoing development of our people and their risk management capabilities.



Definition of default

The Group uses the definition of default for internal risk management purposes and has aligned the definition of non-performing (Stage 3) under accounting standard AASB 9 *Financial Instruments* with the definition of default for prudential purposes.

The definition of default may differ across products and considers both quantitative and qualitative factors, such as the terms of financial covenants and days past due. For retail and wholesale borrowers default occurs when the borrower is more than 90 days past due on any material obligation to the Group, and/or the Group considers the borrower unlikely to meet its credit obligations in full due to financial difficulties. An exposure is past-due when (i) any amount of principal, interest or fee has not been paid at the date it was due or (ii) an advised limit has been breached.

Material deviations from the applicable definition of default are not permitted.

Non-performing financial assets (Stage 3)

Financial assets are assessed for non-performance at each reporting date and more frequently when circumstances warrant further assessment. Evidence of non-performance may include indications that the borrower is experiencing significant financial difficulty, a breach of contract, probability of bankruptcy or other financial reorganisation, as well as a measurable decrease in the estimated future cash flows evidenced by the adverse changes in the payment status of the borrower or economic conditions that correlate with defaults.

An asset that is in stage 3 will move back to stage 2 when, as at the reporting date, it is no longer considered to be non-performing. The asset will migrate back to stage 1 when its credit risk at the reporting date is no longer considered to have increased significantly from initial recognition.

When a financial asset has been identified as non-performing, expected credit losses are measured as the difference between the asset's gross carrying amount and the present value of estimated future cash flows discounted at the instrument's original effective interest rate. For non-performing financial assets with drawn and undrawn components, expected credit losses also reflect any credit losses related to the portion of the loan commitment that is expected to be drawn down over the remaining life of the instrument. When a financial asset is non-performing, interest ceases to be recognised on the regular accrual basis, which accrues income based on the gross carrying amount of the asset. Rather, interest income is calculated by applying the original effective interest rate to the amortised cost of the asset, which is the gross carrying amount less the related loan loss allowance.

The loan loss allowance for non-performing loans in Stage 3 are established at the borrower level, where losses related to non-performing loans are identified on individually significant loans, or collectively assessed and determined through the use of portfolio-based rates, without reference to particular loans.

Individually assessed loans (Stage 3)

The Group estimates individual impairment provisions for individually significant non-performing financial assets within Stage 3. Individual provisions are calculated using the discounted expected future cash flow method. To determine expected future cash flows, one or more scenarios are used. Each scenario is analysed based on the probability of occurrence and including forward looking information.

The best estimate of loan loss is calculated as the weighted average of the shortfall (gross carrying amount minus discounted expected future cash flow using the original effective interest rate) per scenario. The expected future cash flows are based on the restructuring officers' best estimate when recoveries are likely to occur. Recoveries can be from different sources including repayment of the loan, additional drawing, collateral recovery, asset sale. Cash flows from collateral and other credit enhancements are included in the measurement of the expected credit losses of the related financial asset when it is part of or integral to the contractual terms of the financial asset and the credit enhancement is not recognised separately. The estimation of future cash flows are subject to significant estimation uncertainty and assumptions.



Collectively assessed loans (Stages 1 to 3)

Loans that are collectively assessed are grouped on the basis of similar risk characteristics, taking into account loan type, industry, geographic location, collateral type, past due status and other relevant factors. The collectively-assessed loan loss allowance reflects: (i) the expected amount of principal and interest calculated under the terms of the original loan agreement that will not be recovered, and (ii) the impact of time delays in collecting principal and/or interest (time value of money).

Write-off and debt forgiveness

Loans and the related ECL are written off, either partially or in full, when there is no realistic prospect of recovery. Write-offs are made:

- after a restructuring has been completed and there is a high improbability of recovery of part of the remaining loan exposure (including partial debt waivers);
- in a bankruptcy liquidation scenario (not as a result of a re-organisation);
- when there is a high improbability of recovery of the remaining loan exposure or certainty that no recovery can be realised;
- after divestment or sale of a credit facility at a discount;
- upon conversion of a credit facility into equity; or
- the Group releases a legal (monetary) claim it has on its customer.

Presentation of impairment

Loss allowances for financial assets measured at amortised cost are deducted from the gross carrying amount of the assets. For debt securities at FVOCI, the loss allowance is recognised in other comprehensive income, instead of deducting the carrying amount of the asset. Impairment losses on debt securities measured at amortised cost is presented in the profit or loss in addition to loan loss allowance.



Portfolios subject to Internal Ratings-Based approach

Effective from 1 April 2018, IBAL was accredited to use the Internal Ratings-Based (IRB) approaches to calculate its capital requirements under APRA Prudential Standard APS 113 '*Capital Adequacy: Internal Ratings-based Approach to Credit Risk*'. IBAL is approved to use the Advanced Internal Ratings-Based (AIRB) approach for the Residential mortgages portfolio, and the Foundation Internal Ratings-Based (FIRB) approach for the Financial Institution portfolios for regulatory capital purposes. As per 1 April 2020 IBAL was accredited to apply the FIRB approach to its Corporate Lending portfolio.

There are different elements that drive the determination of risk-weighted assets under the IRB approach. These include:

- **Probability of Default (PD):** an estimate of a counterparty or facility's likelihood to go into default within the next 12 months.
- **Loss Given Default (LGD):** measures the portion of the exposure expected to be lost in the event of default.
- **Exposure at Default (EAD):** estimates of the outstanding amount at the moment of default. For a defaulted exposure, it is the exposure at observation.

The following paragraphs explain how these are derived for IBAL's portfolios.

Internal Ratings-Based approach for Residential Mortgages

PD is derived by mapping a score to a risk class with an assigned PD. The score is calculated using a statistical scorecard with static (origination) and dynamic (behavioural) attributes at a facility level.

LGD is estimated as the net present value of the post-default loss, including an allowance for direct and indirect costs, expressed as a percentage of the EAD. Adjustments based on external and internal data are made to the LGD of a facility for a downturn in the economic cycle. This is applied by varying the cure and recovery rates.

EAD is based on the limit and the estimated credit limit excess (CLE).

Foundation Internal Ratings-Based approach for Bank and Corporate exposures

Each Bank and Corporate counterparty is assigned a PD derived from a risk rating that is based on a variety of qualitative and quantitative risk drivers. Each facility is assigned an LGD per the FIRB approach which is set out in APS 113 *Capital Adequacy: Internal Ratings-based Approach to Credit Risk*. EAD is calculated in accordance with the supervisory estimates for on-balance sheet components and off-balance sheet exposures, which are converted to on-balance sheet equivalents using the FIRB conversion factors detailed in APS 112 *Capital Adequacy: Standardised Approach to Credit Risk*.

Internal Rating system

The outcomes of the different PD models are mapped to a 'Master scale' of 22 risk ratings (1=highest rating; 22=lowest rating). The 22 grades are composed of the following categories:

Risk category	Risk Rating	S&P Global Rating	Moody's Rating	Fitch Rating
Lower risk	1 to 10	AAA to BBB-	Aaa to Baa3	AAA to BBB-
Medium risk	11 to 17	BB+ to CCC-	Ba1 to Caa3	BB+ to CCC
High risk	18 to 19	CC to C	Ca to C	CC to C
Non-performing	20 to 22	D	C	D

IBAL's IRB models are subject to annual monitoring and full review on a 3 year cycle under the 'Monitoring and Testing Standards for credit risk IRB models'. The standard provides a model acceptance framework which defines the properties of a good performing model and allows for the independent testing and validation of the IRB models and rating system.



Portfolios subject to Supervisory Slotting approach

Effective 1 April 2020, IBAL was accredited to use the Supervisory Slotting approaches to calculate its capital requirements for its Project Finance portfolio and the majority of its Commercial Real Estate portfolio, under APRA Prudential Standard APS 113 *Capital Adequacy: Internal Ratings-based Approach to Credit Risk*.

The entirety of IBAL's Project Finance book is treated using this approach, as are eligible commercial real estate exposures (defined per requirements under APRA Reporting Form 230) in IBAL's Real Estate Finance and Commercial Property Finance portfolios. Certain exposures in the IBAL Commercial Property Finance book do not meet all of the commercial real estate eligibility criteria per APRA Reporting Form 230 and these continue to be subject of the Standardised Approach.

For the Project Finance portfolio, IBAL uses a 'single dimension' slotting approach, which maps the Probability of Default (PD) of a borrower to a pre-determined risk weight for capital calculation purposes.

For the eligible parts of its Commercial Real Estate portfolio, IBAL uses a 'dual dimension' slotting approach, which utilises a combination of the Probability of Default (PD) of a borrower and the attendant Loan-to-Value ratio for the various exposures, to map to a pre-determined risk weight for capital calculation purposes.

There are different elements that drive the determination of risk-weighted assets under the Supervisory Slotting approach.

1. The **risk weight** is determined using the following input:
 - **Probability of Default (PD):** an estimate of a counterparty or facility's likelihood to go into default within the next 12 months.
 - **Loan to Value Ratio:** measures the degree of collateral value coverage relative to the size of the borrower exposure.
2. **Exposure at Default (EAD):** estimates of the outstanding amount at the moment of default. For a defaulted exposure, it is the exposure at observation. EAD estimates are determined in accordance with the supervisory estimates for on-balance sheet components and off-balance sheet exposures, which are converted to on-balance sheet equivalents using the FIRB conversion factors detailed in APS 112 *Capital Adequacy: Standardised Approach to Credit Risk*.

Portfolios subject to Standardised Approach

Exposures subject to the standardised approach include:

- All exposures in the IBAL Priority Commercial Mortgage (PCM) portfolio.
- Sovereign exposures in the IBAL Treasury portfolio.
- Certain exposures in the Commercial Property Finance book not meeting all of the eligibility criteria for the Supervisory Slotting Approach.
- Certain Corporate exposures in IBAL's Wholesale Banking portfolio remain subject of the Standardised Approach, as they do not meet all of the eligibility criteria for the Supervisory Slotting Approach or for the Foundation Internal Ratings Based Approach. These are small portfolios in niche markets for ING Australia.
- Legacy Residential mortgages, such as the loans to Self-Managed Superannuation Funds.
- Other Retail exposures, including the Credit Card and Personal Loan products.

Risk weights and exposure determination are applied in accordance with APS 112 *Capital Adequacy: Standardised Approach to Credit Risk*.



Credit Risk Mitigation

The following section describes the approach that the Group takes as credit risk mitigation on its market related exposures.

Collateral

The Group has entered into various collateralisation arrangements (documented via the Credit Support Annexes (CSAs)) with all individual Bank counterparties which allow the Group to issue margin (collateral) calls in support of any adverse mark-to-market adjustments on the aggregate value of outstanding derivative positions between the Group and the individual Bank counterparties. CSAs require individual counterparties to post collateral when mark-to-market positions exceed agreed thresholds. The Group has policies and procedures in place for the acceptance of collateral for the purposes of mitigating credit risk, and only accepts cash collateral in respect of obligations under the CSAs and bonds in respect of any repurchase agreements.

The Group has formal processes in place to ensure that calls for collateral top-up or exposure reductions are made promptly.

Netting

The Group does not use Master Netting Arrangements and instead relies on the specific CSAs appended to the global market product specific ISDA (International Swaps and Derivatives Association) Master Agreement. The Group recognises the netting benefits included in the CSAs when calculating replacement costs of netting sets, and exposure after credit risk mitigation for regulatory reporting purposes.

Close-out netting is not used by the Group for the off-balance sheet financial market transactions when calculating credit risk exposure.

Guarantor Creditworthiness

The Group does not accept any other forms of credit risk mitigation (apart from cash) and the purchase of credit derivatives and / or guarantees from eligible counterparties is not accepted as an eligible credit risk mitigant for the purposes of regulatory reporting.

Concentrations

The Group manages counterparty (or groups of related counterparties) credit risk concentrations in accordance with its Large Exposure Policy. The Group applies exposure limits within both the counterparty type and related counterparty group, and reviews these limits annually.

Counterparty Credit Risk

Counterparty credit risk arises in respect of the Group's derivatives and liquidity portfolios. The Group's exposure to individual counterparties is measured using the Standardised Approach to Counterparty Credit Risk. This method is the sum of current credit exposure and potential future credit exposure (the add-on) of these contracts. Current credit exposure is defined as the sum of the positive mark-to-market value (or replacement cost) of these contracts.

The credit approval process for counterparty credit risk limits is completed and limits are approved on an uncommitted and unadvised basis following a bespoke assessment of the creditworthiness of each counterparty / group of related counterparties. Capital (and if required, credit provisions) is allocated in respect of individual counterparties in accordance with their Risk Rating, Exposure and Collateral (if any).

Collateral - Derivatives

The Group documents and manages its counterparty credit risk exposure in respect of its hedging activities via standalone CSAs and clearing of eligible trades via Central Counterparties (CCPs). The Group re-values the mark-to-market of derivatives positions and the resultant net exposure position against the various Bank counterparties, on a daily basis. The Group collateralises the derivative portfolio with Cash only.



Wrong Way Risk

Wrong way risk is a description of the positive correlation between the level of exposure and the default probability of a counterparty. In respect of collateral, wrong way risk describes the negative correlation between the value of the collateral that is held and the default probability of the counterparty that the collateral is held in respect of. The Group's Wrong Way Risk (WWR) Policy provides a framework of regulatory and internal minimum standards for identifying, monitoring and managing WWR for Financial Markets transactions.

The policy identifies two sources of WWR:

- Over-the counter (OTC) derivatives, both cleared and centrally cleared, where there is a correlation between exposures – driving risk factors and the counterparty default probability.
- Financial Collateral: Variation margin, initial margin, OTC margin collateral and Securities financing transactions (SFT) collateral – where there is a correlation between the counterparty default and the liquidation value of collateral. Tri-Party SFTs are also in scope of this policy.

Where WWR exposure is identified, available avenues of remediation include (but are not limited to) reduction in limits, acceptance of substitute collateral or purchase of credit insurance.

Consequence of a Downgrade in the Group's credit rating

Downgrades in the Group's credit rating may trigger a requirement for the Group to post additional collateral in respect of a range of obligations under its CSA obligations. The impact of a downgrade of the Group credit rating has been calculated at \$116m. This is the same across a 1, 2 or 3 notches downgrade due to the fact that the collateral amount does not vary once the minimum rating requirement is triggered.

Interest rate risk in the banking book

Broadly defined, interest rate risk is the risk of a change in income or economic value of the Group as a result of movements in market interest rates. The term "interest rate risk" can be classified into four main categories:

- **Repricing risk** - the risk of loss in earnings or economic value caused by a change in the overall level of interest rates. This risk arises from mismatches in the repricing dates of banking book assets and liabilities. The repricing date of an asset, liability or other banking book item is the date on which the principal of that item is repaid (in whole or part) to, or by the Bank or on which the interest rate on that principal is reset, if earlier.
- **Yield curve risk** - the risk of loss in earnings or economic value caused by a change in the relative levels of interest rates for different tenors (that is, a change in the slope or shape of the yield curve). Yield curve risk also arises from repricing mismatches between assets and liabilities, so, for most purposes these are grouped together.
- **Basis risk** - the risk of loss in earnings or economic value of the banking book arising from imperfect correlation in the adjustment of the interest rates earned and paid on different instruments with otherwise similar repricing characteristics.
- **Optionality risk** - the risk of loss in earnings or economic value due to the existence of stand-alone or embedded options to the extent that the potential for those losses is not included in the measurement of repricing, yield curve or basis risks. An option provides the holder the right but not the obligation to buy, sell or in some manner alter the cash flow of an instrument or financial contract. In the case of options embedded in customer products, losses from optionality risk will arise from customers exercising choices that cause the actual repricing dates to deviate from those specified by the repricing assumptions.



Managing and monitoring interest rate risk

The Bank's Treasury department is responsible for managing IRRBB, while the Market Risk unit (reporting into the Chief Risk Officer and ALCO) provides independent oversight of this management. Treasury hedges residual market risk exposures using derivatives.

The Bank measures its sensitivity to the above types of interest rate risk, and supplements this with regular stress testing of the underlying variables. Triggers and early warning indicators are in place to ensure that potential limit breaches are identified and acted upon early. Risk mitigation is further explained in Note 9 of the Group Annual Report 2022 in relation to hedging using derivatives to mitigate exposure to interest, market and foreign exchange risk. The Bank also has APRA model accreditation to determine IRRBB regulatory capital. Under the model, regulatory capital is determined using a Historical Value-at-Risk (HVaR) model based on 10 years of historical data with a scaled 1 year, 99th percentile, one-tailed confidence interval. The calculated HVaR exposure is measured relative to a Board-approved risk appetite limit.

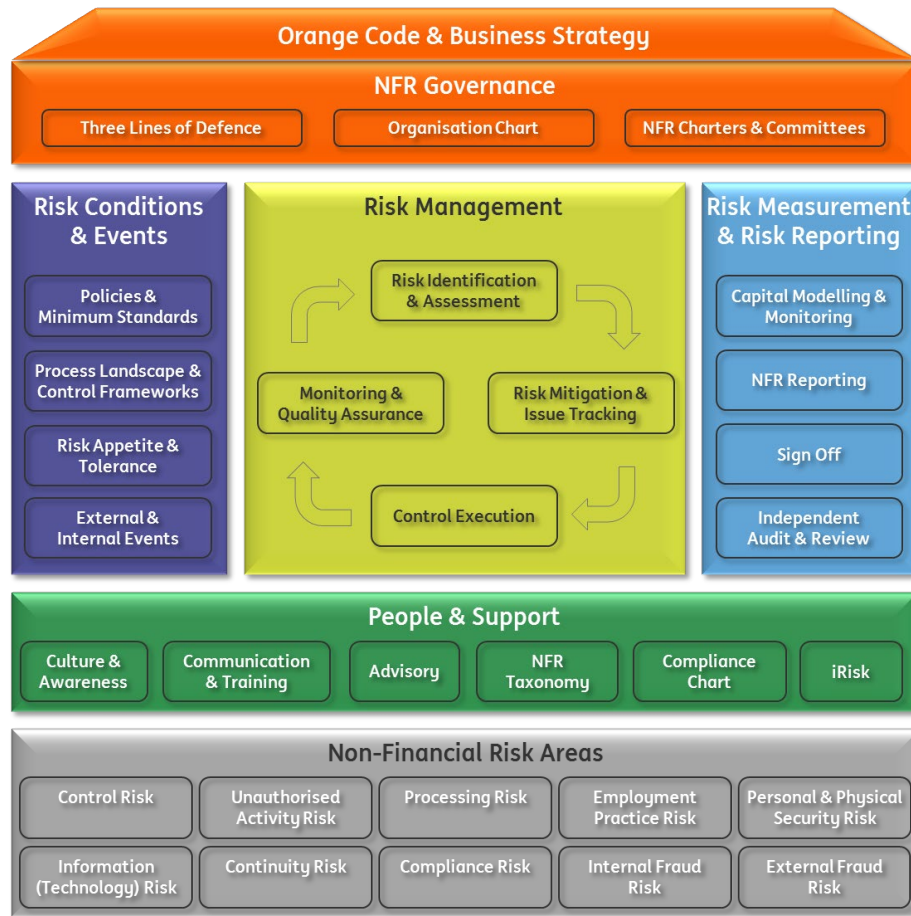
The Bank also measures and manages the structural interest rate mismatch associated with the transfer priced balance sheet. This is done by measuring the net interest income (NII) and net present value (NPV) sensitivity of the balance sheet to changes in interest rates, which is reported to and overseen by ALCO. Another key metric used to manage IRRBB is the sensitivity of NII, which is measured using NII-at-Risk (NIIaR). NIIaR is calculated by measuring projected earnings over a 1, 2 and 3 year time horizon using a number of predefined scenarios specifying changes in the level and term structure of interest rates. Measurement of NIIaR incorporates forecasts of runoff in existing business, as well as new business over the projected time horizon. Both NIIaR and NPVaR take into account behavioural assumptions relating to the Bank's mortgage products and those without contractual maturity (such as savings and current accounts). They are subject to Board approved risk appetite limits.

The Bank's operations are primarily carried out in Australian dollars, therefore appetite for foreign exchange risk is low and monitored on a daily basis by the Market Risk unit.

Daily monitoring of market risk exposures is carried out independently by the Market Risk unit. The exposures are reported to senior management across a number of stakeholder groups (Treasury, Finance and Risk). Monthly reports are produced for the ALCO, while quarterly reports are also prepared for Board Risk Committee to fully and transparently disclose all material market risk exposures and any issues that might have arisen during the reporting period.

Managing and monitoring non-financial risk

The Bank manages non-financial risk (NFR) via the Non-Financial Risk Framework, which consists of the following components:



- **NFR Governance** - details the main principles and key organisational structures of the Group, governing the management practices that apply to all operations of the bank relevant for managing and measuring non-financial risk.
- **Risk Conditions & Events** - takes into account the external and internal constraints and events for managing nonfinancial risk.
- **Risk Management** - involves Identifying risks to the bank, measuring exposures to those risks, ensuring effective monitoring of risk exposures and corresponding capital needs on an ongoing basis, taking steps to control or mitigate risk and reporting to management.
- **Risk Measurement & Risk Reporting** - relates periodic reporting containing material non-financial risk related information (NFRD) in order to measure and monitor risk exposure against the risk appetite and tolerance. Metrics used are preferably generated/calculated automatically based on iRisk (a GRC system) data and translated in clear messages for the relevant target audience and decision-makers, allowing for a timely response.
- **People & Support** - further supports the risk management processes by:
 - Embracing the Group Values and behaviours;
 - Developing skills and expertise of employees through training and communication within all lines of defence;
 - Providing challenge, advice & support to the Business and the Functional Line on significant NFR matters and the interpretation and application of NFR Policies, Minimum Standards and regulatory requirements.



Securitisation disclosures

Securitisation is the process of transferring assets into a Special Purpose Vehicle (“SPV”) and then using those assets as collateral for the issuance of debt securities. The cash flow from the pool of assets is used to make payments of interest and principal to the holders of the debt securities. There are generally at least two classes of securities issued by an SPV, with each class being exposed to a different degree of credit risk.

Securitisation Activities

The Group uses securitisation for the management of its funding and liquidity requirements. The Group equitably assigns residential mortgages that it has originated to SPVs which in turn issue notes.

The IDS Trust 2008-1 is the Group’s internal securitisation transaction. The IDOL program is the Group’s external securitisation program. The Group provides a range of facilities to the various IDOL trusts as well as IDS 2008-1, including interest rate swaps, basis swaps, redraw facilities, liquidity facilities and bank accounts. In 2021, as part of the wholesale banking activities, the Group commenced activities including the provision of facilities and funding to securitisation special purpose vehicles (SPVs) funding third party originated assets.

Risk Assessment

When providing various facilities to the IDOL Trusts and IDS Trust 2008-1, the Group does take on some market risk and liquidity risks. The relevant risks are considered at the inception of each trust and the transactions are recorded in the relevant systems against approved limits. Exposures are monitored on an ongoing basis.

The Group does not employ credit risk mitigation techniques such as guarantees and credit derivatives.

When the Group undertakes a securitisation under the IDOL program it uses S&P Global Ratings and Moody’s Investors Service to provide ratings on the securities issued by the trust. Securities issued by the IDS 2008-1 Trust are rated by S&P Global Ratings.

The Group only undertakes funding-only securitisations and therefore includes the underlying exposures in the pool in the calculation of its regulatory capital under APS 113.

When a new securitisation trust is established, the Group conducts a full self-assessment against APS 120 to ensure that it is compliant with the standard.

Accounting Policies

The Bank conducts loan securitisation programs whereby the equitable rights to selected mortgage loans are sold to a Trust. The Trust then uses those assets as collateral for the issuance of debt securities.

The investors in the securities issued by a Trust have full recourse to the assets transferred to that Trust. The Bank receives the residual income distributed by each Trust after all payments due to investors and associated costs of the program have been met. In addition to this, the Bank retains the junior notes issued by each Trust and interest rate risk from each Trust is transferred back to the Bank by way of interest rate swaps. Hence, the Bank is considered to retain the risks and rewards of these cash flows. Accordingly, the original sale of the mortgages from the Bank to each Trust does not meet the derecognition criteria set out in AASB 9.

The Bank continues to reflect the securitised loans in their entirety due to retaining substantially all the risks and rewards associated with the loans. Each trust has an obligation to repay all notes that it has issued and these amounts are recognised as financial liabilities of the Controlled Entities of the Bank.

In addition, the Bank discloses securitisation income, which represents income received from the Trusts including the residual spread income, trust manager fees, servicer fees and liquidity facility fees. All transactions between the Bank and the Trusts are eliminated on consolidation.



Liquidity disclosures

Liquidity and Funding Risk

Liquidity risk is the risk that the Group cannot meet its financial liabilities as and when they become due, at reasonable cost and in a timely manner. Treasury is responsible for ensuring that the Group has continuous access to funds in accordance with policies established and monitored by the Board Risk Committee and ALCO. The primary objective is to maintain sufficient liquidity in order to ensure safe and sound operations.

The key objectives of the Group's liquidity management policy are to measure, monitor and report expected liquidity flows and maintain a level of liquidity in excess of regulatory and internal defined limits and also to provide early warning signals of potential adverse developments, so that preventative actions may be taken before any liquidity strain is experienced.

The Group's Liquidity policy has been developed in accordance with the liquidity management policies of ING Groep N.V. and APRA prudential standards. APRA Prudential Standard APS 210 Liquidity includes the liquidity coverage ratio (LCR) that measures the Bank's ability to sustain a 30-day pre-defined liquidity stress scenario. The current internal policy requires the Group to maintain a buffer of marketable liquid assets throughout the year.

The net stable funding ratio (NSFR) establishes a minimum stable funding requirement based on the liquidity profile of the Bank's assets and off balance sheet activity over a one-year horizon.

Part of the Group's liquidity strategy is to have adequate and up to date contingency funding plans and early warning liquidity triggers in place. The contingency funding plans were established to address temporary and long-term liquidity disruptions caused by a general event in the market or an the Group specific event. These plans ensure that all roles and responsibilities are clearly defined and all necessary management information is in place.

The main objective of the Group's contingency funding plan and early warning liquidity triggers is to enable senior management to act effectively and efficiently in times of crisis. The contingency funding plan is regularly tested using crisis simulation, the most recent simulation having been carried out in August 2022.

Liquidity coverage ratio

The Liquidity Coverage Ratio (LCR), as defined in APRA Prudential Standard 210 *Liquidity* (APS 210), measures the Bank's ability to sustain a 30-day pre-defined liquidity stress scenario.

The LCR is calculated as a simple daily average, excluding weekends and public holidays. Liquid assets refers to High Quality Liquid Assets (HQLA), made up of cash balances held with the RBA, Australian Semi Government and Commonwealth Government securities. The average HQLA for the quarter was AUD 8.81bn. The RBA's Committed Liquidity Facility was reduced to zero effective from 1 January 2023.

The main funding sources for the Group are deposits from retail and small business customers. Funding is also sourced from within the global ING Group in the form of deposits. The Group also raises funds from the wholesale market in the form of corporate and bank deposits and by issuing Retail Mortgage backed Securities (RMBS) and covered bonds. The weighted outflows from each of these funding sources are based on APRA determined run-off factors.

Derivatives exposures, potential collateral calls and any contingent funding requirements are taken into account in the daily calculation of LCR as per the requirements in the APRA Prudential Standard, APS 210.

The Group's average LCR for the quarter ended 30 June 2023 was 144%, which is a decrease of 14% from 158% reported for the quarter ended 31 March 2023.

Quantitative disclosures

Capital

APS 330 Table 6b to 6f - Capital requirements in terms of risk-weighted assets

	June 2023 ³	March 2023 ³
Amounts in millions of dollars		
Subject to AIRB approach		
Residential mortgages ⁴	12,120	11,801
Total RWA subject to AIRB approach	12,120	11,801
Subject to FIRB approach		
Financial Institution	344	389
Corporate	1,857	1,818
Total RWA subject to FIRB approach	2,201	2,207
Subject to supervisory slotting approach		
Property finance	5,425	5,551
Project finance	2,483	2,446
Total RWA subject to supervisory slotting approach	7,908	7,997
Subject to standardised approach		
Residential mortgages	346	288
Property finance	92	102
Sovereign	-	-
Corporate	1,301	1,236
Other retail	425	414
Other assets	78	82
Total RWA subject to standardised approach	2,242	2,122
Securitisation	128	75
Credit valuation adjustment	-	-
Central counterparties	11	9
Total credit risk RWA	24,610	24,211
Interest rate risk in the banking book	3,977	3,669
Operational risk	1,916	1,916
Total RWA	30,503	29,796

³ Prepared under the APRA revised capital framework effective from 1 January 2023. This applies to all March and June 2023 reporting dates.

⁴ The Residential Mortgages Risk Weighted Assets includes an overlay of \$598 million



December 2022⁵

Amounts in millions of dollars

Subject to AIRB approach	
Residential mortgages	14,704
Total RWA subject to AIRB approach	14,704
Subject to FIRB approach	
Banks & other financial institutions	534
Corporate	1,959
Total RWA subject to FIRB approach	2,493
Subject to supervisory slotting approach	
Property finance	5,661
Project finance	2,514
Total RWA subject to supervisory slotting approach	8,175
Subject to standardised approach	
Residential mortgages	40
Property finance	149
Sovereign	1,200
Corporate	1,481
Other retail	372
Other assets	103
Total RWA subject to standardised approach	3,345
Securitisation	68
Credit valuation adjustment	-
Central counterparties	-
Total credit risk RWA	28,785
Interest rate risk in the banking book	3,935
Operational risk	4,272
Total RWA	36,992

APS 330 Table 6g - Capital ratios

	June 2023	March 2023	December 2022
Common equity tier 1 capital ratio	17.0%	17.0%	14.7%
Tier 1 capital ratio	17.0%	17.0%	14.7%
Total capital ratio	17.9%	17.8%	15.4%

⁵ Prepared under the APRA capital framework effective until 31 December 2022. This applies to all December 2022 reporting dates.



APS 330 Table 6i - Capital floor⁶

	June 2023
Risk weighted assets under the standardised approach	
Credit risk	35,664
Interest rate risk in the banking book	n/a
Operational risk	1,916
Total	37,580
Risk weighted assets prior to application of floor	
Credit risk	24,610
Interest rate risk in the banking book	3,977
Operational risk	1,916
Total	30,503
Capital floor at 72.5%	27,246
Capital floor adjustment	-

⁶ RWA for residential mortgages measured under the IRB approach is \$20,555 million when calculated under the standardised approach.



Credit risk⁷

APS 330 Table 7b - Credit risk exposure by portfolio type

June 2023					
Amounts in millions of dollars	On-Balance sheet	Off-Balance sheet		Total	6-month average
		Market related	Non-market related		
Residential mortgages	57,030	-	7,315	64,345	63,465
Property finance	5,959	-	453	6,412	6,506
Project finance	3,265	-	196	3,461	3,420
Corporate	4,370	-	1,204	5,574	5,478
Financial institution	942	-	500	1,442	1,648
Sovereign	8,793	325	-	9,118	9,400
Other retail	377	-	103	480	473
Other assets	78	-	-	78	80
Central counterparties	-	527	-	527	487
Total credit exposures	80,814	852	9,771	91,437	90,955

March 2023 ^{8,9}					
Amounts in millions of dollars	On-Balance sheet	Off-Balance sheet		Total	3-month average
		Market related	Non-market related		
Residential mortgages	55,240	-	7,344	62,584	-
Property finance	6,108	-	491	6,599	-
Project finance	3,179	-	200	3,379	-
Corporate	4,286	-	1,096	5,382	-
Financial institution	1,130	-	501	1,631	-
Sovereign	9,681	222	-	9,903	-
Other retail	369	-	96	465	-
Other assets	82	-	-	82	-
Central counterparties	-	447	-	447	-
Total credit exposures	80,075	669	9,728	90,472	-

December 2022					
Amounts in millions of dollars	On-Balance sheet	Off-Balance sheet		Total	6-month average
		Market related	Non-market related		
Residential mortgages	55,233	-	8,672	63,905	64,535
Property finance	6,318	-	613	6,931	7,017
Project finance	3,195	-	250	3,445	3,334
Corporate	4,225	-	1,232	5,457	5,165
Banks & other financial institutions	2,916	409	24	3,349	2,536
Sovereign	8,887	-	-	8,887	8,791
Other retail	372	-	-	372	352
Other assets	159	-	-	159	148
Total credit exposures	81,305	409	10,791	92,505	91,878

⁷ Excluding Securitisation

⁸ Restated to separate Central counterparties

⁹ Average exposures are not presented for this period due to the revised capital framework



APS 330 Table 7d - Credit risk exposure by portfolio type and industry sector

June 2023								
Amounts in millions of dollars	Counterparty type							Total
	Retail	Financial institution	Sovereign	Property finance	Infra-structure	Utility & Power	Other	
Residential mortgages	64,345	-	-	-	-	-	-	64,345
Property finance	-	-	-	6,412	-	-	-	6,412
Project finance	-	-	-	-	1,186	1,714	561	3,461
Corporate	-	-	-	-	199	1,522	3,853	5,574
Financial institution	-	1,442	-	-	-	-	-	1,442
Sovereign	-	-	9,118	-	-	-	-	9,118
Other retail	480	-	-	-	-	-	-	480
Other assets	-	-	-	-	-	-	78	78
Central counterparties	-	527	-	-	-	-	-	527
Total credit exposures	64,825	1,969	9,118	6,412	1,385	3,236	4,492	91,437

December 2022								
Amounts in millions of dollars	Counterparty type							Total
	Retail	Bank	Sovereign	Property finance	Infra-structure	Utility & Power	Other	
Residential mortgages	63,905	-	-	-	-	-	-	63,905
Property finance	-	-	-	6,931	-	-	-	6,931
Project finance	-	-	-	-	1,190	1,650	605	3,445
Corporate	-	-	-	7	88	1,459	3,903	5,457
Banks & other financial institutions	-	3,349	-	-	-	-	-	3,349
Sovereign	-	-	8,737	-	150	-	-	8,887
Other retail	372	-	-	-	-	-	-	372
Other assets	-	-	-	-	-	-	159	159
Total credit exposures	64,277	3,349	8,737	6,938	1,428	3,109	4,667	92,505



APS 330 Table 7e - Credit risk exposure by portfolio type and residual contractual maturity¹⁰

June 2023						
Amounts in millions of dollars	<=3 months	>3 months <=1 year	>1 year <=5 years	>5 years	No maturity specified	Total
Residential mortgages	-	402	39	63,904	-	64,345
Property finance	1,555	1,355	3,060	442	-	6,412
Project finance	97	191	2,721	452	-	3,461
Corporate	1,190	374	2,764	1,246	-	5,574
Financial institution	970	352	118	2	-	1,442
Sovereign	1,061	703	2,946	4,408	-	9,118
Other retail	-	8	431	40	1	480
Other assets	-	-	-	-	78	78
Central counterparties	-	-	527	-	-	527
Total credit exposures	4,873	3,385	12,606	70,494	79	91,437

December 2022						
Amounts in millions of dollars	<=3 months	>3 months <=1 year	>1 year <=5 years	>5 years	No maturity specified	Total
Residential mortgages	-	2	42	63,385	476	63,905
Property finance	385	1,146	4,815	584	1	6,931
Project finance	-	275	2,777	393	-	3,445
Corporate	79	188	3,715	1,474	1	5,457
Banks & other financial institutions	1,780	920	648	1	-	3,349
Sovereign	2,250	443	3,748	2,446	-	8,887
Other retail	-	7	221	35	109	372
Other assets	71	-	-	-	88	159
Total credit exposures	4,565	2,981	15,966	68,318	675	92,505

¹⁰ Market related exposures are reported as the notional amount weighted average maturity



APS 330 Table 7f - Non-performing by portfolio type

June 2023				
Amounts in millions of dollars	Non-performing facilities	Specific provisions	Quarterly movement	
			Charge to specific provisions	Write offs
Residential mortgages	541	39	2	-
Property finance	2	-	-	-
Project finance	-	-	-	-
Corporate	44	3	1	-
Financial institution	-	-	-	-
Sovereign	-	-	-	-
Other retail	1	11	3	1
Other assets	-	-	-	-
Central counterparties	-	-	-	-
Total	588	53	6	1

March 2023 ¹¹				
Amounts in millions of dollars	Non-performing facilities	Specific provisions	Quarterly movement	
			Charge to specific provisions	Write offs
Residential mortgages	543	37	(3)	-
Property finance	7	-	-	-
Project finance	-	-	-	-
Corporate	19	2	(1)	-
Financial institution	-	-	-	-
Sovereign	-	-	-	-
Other retail	2	8	-	1
Other assets	-	-	-	-
Central counterparties	-	-	-	-
Total	571	47	(4)	1

December 2022					
Amounts in millions of dollars	Past due facilities	Impaired facilities	Specific provisions	Quarterly movement	
				Charge to specific provisions	Write offs
Residential mortgages	226	341	40	(5)	-
Property finance	7	6	-	(1)	-
Project finance	-	-	-	-	-
Corporate	14	11	3	-	-
Banks & other financial institutions	-	-	-	-	-
Sovereign	-	-	-	-	-
Other retail	-	8	8	-	1
Other assets	-	-	-	-	-
Total	247	366	51	(6)	1

¹¹ Restated to separate Central counterparties

APS 330 Table 7h - Movement in collective and individual provisions

Movement in collective provisions		June 2023
Amounts in millions of dollars		
Opening balance		121
Net charge against profit and loss		38
Recoveries		-
Write-offs		(2)
Less collective provisions transferred to specific provisions		-
Total collective provisions		156
Less collective provisions treated as specific provisions for regulatory purposes		(53)
General provisions		103

Movement in collective provisions		December 2022
Amounts in millions of dollars		
Opening balance		97
Net charge against profit and loss		26
Recoveries		-
Write-offs		(2)
Less collective provisions transferred to specific provisions		-
Total collective provisions		121
Less collective provisions treated as specific provisions for regulatory purposes		(51)
Additional GRCL requirement		94
General provisions		164

Movement in individual provisions		June 2023	December 2022
Amounts in millions of dollars			
Opening balance		-	-
New and increase provisioning		-	-
Write back of provisions no longer required		-	-
Write-offs		-	-
Discount unwind to interest income		-	-
Add collective provisions transferred to specific provisions		-	-
Total individual provisions		-	-



APS 330 Table 7i - Credit risk exposures by portfolio type and modelling approach

June 2023					
Amounts in millions of dollars	AIRB	FIRB	Slotting	Standardised	Total
Portfolio type					
Residential mortgages	63,918	-	-	427	64,345
Property finance	-	-	6,298	114	6,412
Project finance	-	-	3,461	-	3,461
Corporate	-	3,891	-	1,683	5,574
Financial institution	-	1,442	-	-	1,442
Sovereign	-	-	-	9,118	9,118
Other retail	-	-	-	480	480
Other assets	-	-	-	78	78
Central counterparties	-	-	-	527	527
Total credit exposures	63,918	5,333	9,759	12,427	91,437

December 2022					
Amounts in millions of dollars	AIRB	FIRB	Slotting	Standardised	Total
Portfolio type					
Residential mortgages	63,844	-	-	61	63,905
Property finance	-	-	6,782	149	6,931
Project finance	-	-	3,445	-	3,445
Corporate	-	3,976	-	1,481	5,457
Banks & other financial institutions	-	3,349	-	-	3,349
Sovereign	-	-	-	8,887	8,887
Other retail	-	-	-	372	372
Other assets	-	-	-	159	159
Total credit exposures	63,844	7,325	10,227	11,109	92,505



APS 330 Table 7j - Reconciliation between APS 220 provisions and Australian accounting standards

June 2023			
Amounts in millions of dollars	General provisions	Specific provisions	Total
Collective provision	103	53	156
Individual provision	-	-	-
Total provisions	103	53	156

March 2023			
Amounts in millions of dollars	General provisions	Specific provisions	Total
Collective provision	81	47	128
Individual provision	-	-	-
Total provisions	81	47	128

December 2022			
Amounts in millions of dollars	General reserve for credit losses	Specific provisions	Total
Collective provision	70	51	121
Individual provision	-	-	-
Total provisions	70	51	121
Additional GRCL requirement	94	-	94
Total regulatory provisions	164	51	215



APS 330 Table 8b - Exposures subject to the standardised approach and supervisory risk-weights in the IRB approaches

Standardised approach

Exposure after credit risk mitigation	June 2023
Amounts in millions of dollars	
Risk weight	
0%	9,119
2%	527
25%	56
30%	28
40%	48
45%	60
50%	205
60%	363
65%	7
70%	66
75%	625
85%	152
90%	43
95%	-
100%	1,041
105%	7
110%	2
120%	8
150%	70
>150%	-
Capital deductions	-
Total	12,427

Exposure after credit risk mitigation	December 2022
Amounts in millions of dollars	
Risk weight	
0%	7,687
20%	71
35%	-
50%	26
75%	33
100%	3,291
150%	1
>150%	-
Capital deductions	-
Total	11,109



Supervisory Slotting

Exposure after credit risk mitigation	June 2023	December 2022
Amounts in millions of dollars		
Supervisory category		
Strong (70%)	6,537	6,901
Good (90%)	2,674	2,662
Satisfactory (115%)	330	527
Weak (250%)	218	137
Default (0%)	-	-
Total	9,759	10,227



APS 330 Table 9d – Exposures by portfolio type and PD band (Portfolios subject to IRB approach)¹²

June 2023															
Amounts in millions of dollars	PD band														Total
	0.0% to < 0.03%	0.03% to < 0.1%	0.1% to < 0.2%	0.2% to < 0.3%	0.3% to < 0.5%	0.5% to < 0.7%	0.7% to < 1.0%	1.0% to < 2.0%	2.0% to < 3.0%	3.0% to < 5.0%	5.0% to < 7.0%	7.0% to < 10.0%	10.0% to < 100%	Default	
Credit risk exposures															
Residential mortgages	-	24,250	8,614	6,226	5,671	12,601	-	4,140	412	743	369	-	362	530	63,918
Financial institution	-	1,442	-	-	-	-	-	-	-	-	-	-	-	-	1,442
Corporate	-	382	1,887	956	517	-	120	29	-	-	-	-	-	-	3,891
Total credit risk exposures	-	26,074	10,501	7,182	6,188	12,601	120	4,169	412	743	369	-	362	530	69,251
Undrawn commitments															
Residential mortgages	-	4,575	1,071	219	196	1,155	-	43	1	3	1	-	1	-	7,265
Financial institution	-	500	-	-	-	-	-	-	-	-	-	-	-	-	500
Corporate	-	314	253	317	179	-	37	-	-	-	-	-	-	-	1,100
Total undrawn commitments	-	5,389	1,324	536	375	1,155	37	43	1	3	1	-	1	-	8,865
Exposure - weighted average EAD															
Residential mortgages	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Financial institution	-	38	-	-	-	-	-	-	-	-	-	-	-	-	38
Corporate	-	64	46	25	10	-	7	14	-	-	-	-	-	-	25
Exposure - weighted average LGD (%)															
Residential mortgages	-	15	16	16	16	17	-	17	17	17	17	-	17	32	16
Exposure - weighted average risk weight (%)															
Residential mortgages	-	6	9	13	19	25	-	43	61	76	104	-	152	254	19
Financial institution	-	24	-	-	-	-	-	-	-	-	-	-	-	-	24
Corporate	-	36	33	50	84	-	130	125	-	-	-	-	-	-	48

¹² This table is rounded to the nearest million and, as a result, where individual deals in each PD category are, on average, less than \$0.5m this will appear as 'nil' in this disclosure

APS 330 Table 9d – Exposures by portfolio type and PD band (Portfolios subject to IRB approach)¹³ (continued)

December 2022																
Amounts in millions of dollars	PD band														Default	Total
	0.0% to < 0.03%	0.03% to < 0.1%	0.1% to < 0.2%	0.2% to < 0.3%	0.3% to < 0.5%	0.5% to < 0.7%	0.7% to < 1.0%	1.0% to < 2.0%	2.0% to < 3.0%	3.0% to < 5.0%	5.0% to < 7.0%	7.0% to < 10.0%	10.0% to < 100%			
Credit risk exposures																
Residential mortgages	-	33,897	-	8,370	3,305	7,678	4,844	3,066	528	807	-	454	320	575	63,844	
Banks & other financial institutions	-	3,349	-	-	-	-	-	-	-	-	-	-	-	-	3,349	
Corporate	-	845	1,338	1,000	602	-	191	-	-	-	-	-	-	-	3,976	
Total credit risk exposures	-	38,091	1,338	9,370	3,907	7,678	5,035	3,066	528	807	-	454	320	575	71,169	
Undrawn commitments																
Residential mortgages	-	6,362	-	512	186	330	207	1,015	12	19	-	11	7	8	8,669	
Banks & other financial institutions	-	433	-	-	-	-	-	-	-	-	-	-	-	-	433	
Corporate	-	156	66	452	205	-	55	-	-	-	-	-	-	-	934	
Total undrawn commitments	-	6,951	66	964	391	330	262	1,015	12	19	-	11	7	8	10,036	
Exposure - weighted average EAD																
Residential mortgages	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Banks & other financial institutions	-	70	-	-	-	-	-	-	-	-	-	-	-	-	70	
Corporate	-	94	61	36	24	-	21	-	-	-	-	-	-	-	43	
Exposure - weighted average LGD (%)																
Residential mortgages	-	20	-	21	21	21	21	21	21	20	-	20	21	23	21	
Exposure - weighted average risk weight (%)																
Residential mortgages	-	6	-	17	27	35	45	62	76	98	-	131	155	231	23	
Banks & other financial institutions	-	16	-	-	-	-	-	-	-	-	-	-	-	-	16	
Corporate	-	29	50	46	64	-	106	-	-	-	-	-	-	-	49	

¹³ This table is rounded to the nearest million and, as a result, where individual deals in each PD category are, on average, less than \$0.5m this will appear as 'nil' in this disclosure

APS 330 Table 9e - Actual losses in reporting period by portfolio type

Portfolios subject to IRB approach		June 2023		December 2022	
Amounts in millions of dollars	Charge to specific provisions	Write-offs	Charge to specific provisions	Write-offs	
Residential mortgages	2	-	(5)	-	
Financial institution	-	-	-	-	
Corporate	1	-	-	-	
Total	3	-	(5)	-	

APS 330 Table 9f (i) - Historical loss analysis by portfolio type

Portfolios subject to IRB approach		June 2023	
Amounts in millions of dollars		Half year actual loss	Regulatory 1 year expected loss estimate
Residential mortgages		-	129
Financial institution		-	0
Corporate		-	4
Total		-	133

Portfolios subject to IRB approach		December 2022	
Amounts in millions of dollars		Half year actual loss	Regulatory 1 year expected loss estimate
Residential mortgages		-	104
Banks & other financial institutions		-	1
Corporate		-	4
Total		-	108

APS 330 Table 9f (ii) – Accuracy of risk estimates by portfolio type

					June 2023
Amounts in millions of dollars	PD		LGD		EAD
	Average estimate	Average actual	Average estimate	Average actual	Estimate to actual ratio
Residential mortgages	0.65%	0.65%	19.91%	1.27%	101%
Financial institution	0.28%	0.00%	N/A	N/A	N/A
Corporate	0.31%	0.00%	N/A	N/A	N/A



APS 330 Table 10b and 10c - Credit risk mitigation¹⁴

June 2023			
Amounts in millions of dollars	Gross exposure	Eligible collateral	Net exposure
Subject to AIRB and FIRB approach			
Residential mortgages	63,918	-	63,918
Financial institution	1,442	-	1,442
Corporate	3,891	-	3,891
Total advanced approach	69,251	-	69,251
Subject to supervisory slotting approach			
Property finance	6,298	-	6,298
Project finance	3,461	-	3,461
Total supervisory slotting approach	9,759	-	9,759
Subject to standardised approach			
Residential mortgages	427	-	427
Property finance	114	-	114
Sovereign	9,118	-	9,118
Corporate	1,683	-	1,683
Other retail	480	-	480
Other assets	78	-	78
Total standardised approach	11,900	-	11,900
Securitisation	852	-	852
Central counterparties	527	-	527
Total exposures	92,289	-	92,289

December 2022			
Amounts in millions of dollars	Gross exposure	Eligible collateral	Net exposure
Subject to AIRB and FIRB approach			
Residential mortgages	63,844	-	63,844
Banks & other financial institutions	3,750	(401)	3,349
Corporate	3,976	-	3,976
Total advanced approach	71,570	(401)	71,169
Subject to supervisory slotting approach			
Property finance	6,781	-	6,781
Project finance	3,445	-	3,445
Total supervisory slotting approach	10,226	-	10,226
Subject to standardised approach			
Residential mortgages	61	-	61
Property finance	150	-	150
Sovereign	8,887	-	8,887
Corporate	1,481	-	1,481
Other retail	372	-	372
Other assets	159	-	159
Total standardised approach	11,110	-	11,110
Securitisation	457	-	457
Total exposures	93,363	(401)	92,962

¹⁴ Exposures for derivatives and securities financing transactions are after netting and financial collateral



APS 330 Table 11b - Counterparty credit risk derivative exposure

Effects of netting on the balance sheet	June 2023	December 2022
Amounts in millions of dollars		
Gross positive fair value	1,256	1,308
Netting benefits	(341)	(401)
Netted current credit exposure	915	907
Net collateral benefit, of which:		
From cash collateral held	(594)	(615)
Replacement cost	321	292
Potential future exposure (PFE) and impact of 1.4 scaling factor	206	117
Exposure at default	527	409

Exposure at default	June 2023	December 2022
Amounts in millions of dollars		
Interest Rate Contracts		
Standardised Approach to Counterparty Credit Risk	527	409
Total	527	409



Securitisation

APS 330 Table 12g - Banking book exposures securitised - traditional securitisation

June 2023		
Amounts in millions of dollars	Originated by the ADI	Third party originated
Underlying asset		
Residential mortgages	13,055	-
Total	13,055	-

December 2022		
Amounts in millions of dollars	Originated by the ADI	Third party originated
Underlying asset		
Residential mortgages	13,199	-
Total	13,199	-

APS 330 Table 12h - Non-performing banking book exposures by asset type

June 2023				
Amounts in millions of dollars	Outstanding exposure	Non-performing	Losses recognised	
Underlying asset				
Residential mortgages	13,055	18	-	-
Total	13,055	18	-	-

December 2022				
Amounts in millions of dollars	Outstanding exposure	Impaired	Past due	Losses recognised
Underlying asset				
Residential mortgages	13,199	15	30	-
Total	13,199	15	30	-



APS 330 Table 12i - Banking book exposures intended to be securitised

	June 2023	December 2022
Amounts in millions of dollars		
Underlying asset		
Residential mortgages ¹⁵	2,000	-
Total	2,000	-

APS 330 Table 12j - Banking book activity for the reporting period

	June 2023	
Amounts in millions of dollars	Total exposures securitised	Recognised gain or loss on sale
Underlying asset		
Residential mortgages	-	-
Total	-	-

	March 2023	
Amounts in millions of dollars	Total exposures securitised	Recognised gain or loss on sale
Underlying asset		
Residential mortgages	-	-
Total	-	-

	December 2022	
Amounts in millions of dollars	Total exposures securitised	Recognised gain or loss on sale
Underlying asset		
Residential mortgages	-	-
Total	-	-

¹⁵ At the date of this report, ING intend to issue a mortgage-backed funding only securitisation up to the value of \$2bn. ING will retain the underlying securitised exposures with no expected impact on Mortgage RWA in subsequent periods.



APS 330 Table 12k - Banking book securitisation exposures retained or purchased

June 2023			
Amounts in millions of dollars	On-balance sheet	Off-balance sheet	Total exposures
Securitisation facility type			
Liquidity support facilities	-	324	324
Credit enhancements	-	21	21
Redraw facilities	-	18	18
Derivative facilities	14	-	14
Holding of securities	13,488	-	13,488
Total securitisation exposures	13,502	363	13,865

March 2023			
Amounts in millions of dollars	On-balance sheet	Off-balance sheet	Total exposures
Securitisation facility type			
Liquidity support facilities	-	325	325
Credit enhancements	-	21	21
Redraw facilities	-	19	19
Derivative facilities	17	-	17
Holding of securities	13,148	-	13,148
Total securitisation exposures	13,165	365	13,530

December 2022			
Amounts in millions of dollars	On-balance sheet	Off-balance sheet	Total exposures
Securitisation facility type			
Liquidity support facilities	-	326	326
Credit enhancements	-	21	21
Redraw facilities	-	20	20
Derivative facilities	14	-	14
Holding of securities	13,116	-	13,116
Total securitisation exposures	13,130	367	13,497



APS 330 Table 12l (i) - Banking book exposure by risk weight band

June 2023			December 2022	
Amounts in millions of dollars		Securitisation exposures subject to SFA		
Risk weight band	Gross Credit Exposure	Risk Weighted Assets	Gross Credit Exposure	Risk Weighted Assets
=<20%	852	128	457	69
>20%–50%	-	-	-	-
>50%–100%	-	-	-	-
>100%–150%	-	-	-	-
>150%–650%	-	-	-	-
>650%–<1250%	-	-	-	-
Total	852	128	457	69

APS 330 Table 12l (ii) - Banking book securitisation exposure deducted from common equity Tier 1 capital

	June 2023	December 2022
Amounts in millions of dollars		
Underlying asset		
Credit enhancements	7	7
Total	7	7



Market risk

APS 330 Table 17b - Interest rate risk in the banking book

Change in economic value	June 2023	December 2022
Amounts in millions of dollars		
+200 basis point shock	96	118
-200 basis point shock	(96)	(118)

Regulatory RWA	June 2023	December 2022
Amounts in millions of dollars		
Interest rate risk in the banking book	3,977	3,935



Liquidity risk

APS 330 Table 20 - Liquidity coverage ratio

The Group manages its LCR position daily, with a Board-approved buffer above the regulatory limit of 100%.

June 2023		
Amounts in millions of dollars	Total unweighted value (daily average)	Total weighted value (daily average)
Liquid assets		
1 High-quality liquid assets (HQLA)		8,807
2 Alternative liquid assets (ALA)		0
3 Reserve Bank of New Zealand (RBNZ) securities		n/a
Cash outflows		
4 Retail deposits and deposits from small business customers, of which:	44,911	4,742
5 <i>stable deposits</i>	31,190	1,560
6 <i>less stable deposits</i>	13,720	3,183
7 Unsecured wholesale funding, of which:	1,293	1,085
8 <i>operational deposits (all counterparties) and deposits in networks for cooperative banks</i>	n/a	n/a
9 <i>non-operational deposits (all counterparties)</i>	1,219	1,012
10 <i>unsecured debt</i>	73	73
11 Secured wholesale funding		359
12 Additional requirements, of which	10,170	1,334
13 <i>outflows related to derivatives exposures and other collateral requirements</i>	711	711
14 <i>outflows related to loss of funding on debt products</i>	20	20
15 <i>credit and liquidity facilities</i>	9,439	603
16 Other contractual funding obligations	1,193	304
17 Other contingent funding obligations	1,241	226
18 Total cash outflows		8,050
Cash inflows		
19 Secured lending (e.g. reverse repos)		-
20 Inflows from fully performing exposures	2,805	1,916
21 Other cash inflows	36	36
22 Total cash inflows	2,841	1,952
23 Total liquid assets		8,807
24 Total net cash outflows		6,098
25 Liquidity Coverage Ratio (%)		144%

(No of observations: 61)



APS 330 Table 20 - Liquidity coverage ratio (continued)

		March 2023	
Amounts in millions of dollars		Total unweighted value (daily average)	Total weighted value (daily average)
Liquid assets			
1	High-quality liquid assets (HQLA)		9,572
2	Alternative liquid assets (ALA)		0
3	Reserve Bank of New Zealand (RBNZ) securities		n/a
Cash outflows			
4	Retail deposits and deposits from small business customers, of which:	45,049	4,807
5	<i>stable deposits</i>	31,047	1,552
6	<i>less stable deposits</i>	14,001	3,255
7	Unsecured wholesale funding, of which:	1,810	1,579
8	<i>operational deposits (all counterparties) and deposits in networks for cooperative banks</i>	n/a	n/a
9	<i>non-operational deposits (all counterparties)</i>	1,676	1,446
10	<i>unsecured debt</i>	134	134
11	Secured wholesale funding		-
12	Additional requirements, of which	9,895	1,311
13	<i>outflows related to derivatives exposures and other collateral requirements</i>	712	712
14	<i>outflows related to loss of funding on debt products</i>	23	23
15	<i>credit and liquidity facilities</i>	9,160	575
16	Other contractual funding obligations	689	6
17	Other contingent funding obligations	1,277	300
18	Total cash outflows		8,003
Cash inflows			
19	Secured lending (e.g. reverse repos)		-
20	Inflows from fully performing exposures	2,815	1,876
21	Other cash inflows	70	70
22	Total cash inflows	2,885	1,946
23	Total liquid assets		9,572
24	Total net cash outflows		6,056
25	Liquidity Coverage Ratio (%)		158%

(No of observations: 63)



Leverage ratio

	June 2023	March 2023	December 2022	September 2022
Amounts in millions of dollars				
Tier 1 capital	5,197	5,063	5,448	5,301
Total exposures	92,020	91,056	89,156	85,511
Leverage ratio	5.7%	5.6%	6.1%	6.2%

