

ING AUSTRALIA GRI REPORTING TABLE 2018

GRI Reference	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
N/A	Material Issues	<p>a. Confidence & Trust earned through fair price for products & services: Our target is to be the best bank with a number one Net Promoter Score (NPS) and a >40 point lead on Big 4 Banks. In 2017, we were number one NPS with 20.7 (Dec17) and our gap to the nearest major (Q4) was 32.7</p> <p>b. Responsible lending & debt prevention: We aim to have our default rates below industry benchmarks. In 2017 we have remained comfortably below industry from an arrears perspective ING 90+days in arrears = 0.20% versus Industry 90+ days in arrears = 0.49%</p> <p>c. System availability, data security and digital innovation: 100% of reported vulnerabilities in 2017 have been actioned</p> <p>d. Talent Attraction and Retention: We measure our staff engagement and organisational health alternating between each bi-annually.</p>	N/A			N/A
STRATEGY & ANALYSIS						
G4-1	Statement from the most senior decision maker in the organisation	Statement from the CEO	N/A			N/A
ORGANISATIONAL PROFILE						
G4-3	Name of the organisation.	ING Bank (Australia) Limited trading as ING Australia	N/A			N/A
G4-4	Primary brands, products, and services.	Primary brands, products or services	N/A			N/A
G4-5	Location of the organization's headquarters.	Location of ING headquarters is Sydney, New South Wales, Australia	N/A			N/A

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GRI Reference	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
G4-6	Number of countries where the organization operates	ING Groep N.V.'s global operations	N/A			N/A
G4-7	Nature of ownership and legal form.	Nature of ownership and legal form	N/A			N/A
G4-8	Markets served	Markets served	N/A			N/A
G4-9	Scale of the organisation	Scale of organisation	N/A			N/A
G4-10	Total workforce by employment type, gender, employment contract and region	See Appendix 1	N/A			N/A
G4-11	Employees covered by collective bargaining agreements	See Appendix 2	N/A			N/A
G4-12	Supply chain	See Appendix 3	N/A			N/A
G4-13	Significant changes during the reporting period	No significant changes	N/A			N/A

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GRI Reference	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
G4-14	Precautionary principle	While we try our best to minimise our direct environmental impact we also attempt to minimise our impact throughout our supply chain. Our Sustainable Procurement Programme ensures we have high standards of supplier sustainability performance and green purchasing strategies. We employ strict social, environmental and anti-corruption standards and monitor supplier performance via specialised sustainable supplier management agencies. Furthermore, we engage in the transition to the circular economy through our circular purchasing strategy. ING's Procurement Sustainability Standards state that a Supplier shall adhere to the United Nations Global Compact principles and therefore support a precautionary approach to environmental challenges and work to limit its environmental impact.	N/A			N/A
G4-15	Economic, environmental and social charters, principles, or other initiatives	Economic, environmental and social charters, principles, and other initiatives	N/A			N/A
G4-16	Memberships of associations and national or international advocacy organizations	Australian Banker's Association (ABA); Financial Services Council (FSC), Association of Superannuation Funds of Australia (ASFA), Mortgage Finance Association of Australia (MFAA), Australian Retail Credit Association; Auscontact Association; Customer Service Institute of Australia; Financial Planning Association of Australia; Association of Financial Advisors; Self-Managed Superfund Association; Mortgage Finance Association of Australia ; LIXI	N/A			N/A

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GRI Reference	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES						
G4-17	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures	Annual Report	N/A			N/A
G4-18	Process for defining report content and Aspect Boundaries and explain how the Reporting Principles have been implemented	Our Approach to Materiality	N/A			N/A
G4-19	List all the material aspects identified	Our Response to Material Issues	N/A			N/A
G4-20	Report the Aspect Boundary of each material aspect.	Our Response to Material Issues	N/A			N/A
G4-21	The Aspect Boundary outside the organization	Our Response to Material Issues	N/A			N/A
G4-22	Explanation of the effect of any re-statements	N/A	N/A			N/A
G4-23	Significant changes from previous reporting periods in the Scope and Aspect Boundaries	No significant changes	N/A			N/A

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GRI Reference	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
STAKEHOLDER ENGAGEMENT						
G4-24	List of stakeholder groups engaged by the organization	Stakeholder engagement Our Approach to Materiality	N/A			N/A
G4-25	Basis for identification and selection of stakeholders with whom to engage	Our Approach to Materiality	N/A			N/A
G4-26	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	Our Approach to Materiality	N/A			N/A
G4-27	Key topics & concerns raised through stakeholder engagement, & how org. responded to those key topics and concerns, Report the stakeholder groups that raised each key topic & concerns	Our Approach to Materiality	N/A			N/A
REPORT PROFILE						
G4-28	Reporting period	Reporting period: 1 January 2017 - 31 December 2017	N/A			N/A
G4-29	Date of most recent previous report	2016 GRI Report	N/A			N/A
G4-30	Reporting cycle	Annual	N/A			N/A
G4-31	Contact point for questions regarding the report or its contents	Contact point for questions regarding this report: sustainability@ing.com.au	N/A			N/A
G4-32	GRI Content Index	This report was prepared in accordance with GRI G4. This Content Index provides links to responses to key GRI indicators for the core GRI G4 reporting requirements.	N/A			N/A

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GRI Reference	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
G4-33	Assurance	Formal assurance was not completed on this content, however KPMG were engaged in 2016 to ensure appropriate controls and procedures were adhered to for key qualitative and quantitative data provided.	N/A			N/A
GOVERNANCE						
G4-34	Governance structure of the organization (incl. report the committees responsible for decision-making on economic, environmental and social impacts)	Refer to Corporate Governance Structure on page 13 of 2017 Annual Report	N/A			N/A
ETHICS & INTEGRITY						
G4-56	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation	See Tab Appendix 4				

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SPECIFIC STANDARD DISCLOSURES						
DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
MATERIAL ASPECT: ECONOMIC PERFORMANCE						
G4-DMA		<p>Key trends having a significant impact on ING and its competitors include:</p> <ol style="list-style-type: none"> 1. Digitisation and customer behaviour are changing markets. Customers increasingly want to bank 24/7 on platforms and in channels of their choice. This means that ING must follow the customer to be relevant in their financial lives. This involves substantial ongoing investment in systems and platforms to provide the best possible service to customers - where and when they want. 2. The financial services sector is subject to increasing regulatory scrutiny and cost. As an example the Australian Prudential Regulatory Authority (APRA) applied growth limits to investor mortgage lending and interest-only lending. In 2017 there was also a multitude of inquiries launched by regulators and government agencies including the Productivity Commission, the ACCC and ASIC. The Federal Government has instigated a Royal Commission to investigate misconduct in financial services. <p>The use of data and cyber security is increasingly important. Hence we need to invest in systems to store, use and safeguard personal and business data. To meet our customers' needs we require a growing amount of data. Increased investment is also needed to protect data against cybercrime.</p>	N/A			Yes

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
		3. Automation/digitalisation is changing the employment market for customers. Artificial intelligence, robotics, digitalisation and automation are rapidly changing the employment market with many traditional jobs disappearing and others being created. The change will have a significant impact on customers and ING will need to help our customers through the transition.				
G4-EC1	Direct economic value generated and distributed, including revenues, operating costs, employee wages and benefits, payments to providers of capital, payments to government (by country) and community investments;	<p>a. The direct economic value generated and distributed (EVG&D) is reported on an accrual basis. The components of the EVG&D is as follows:</p> <ul style="list-style-type: none"> ▪ Direct economic value generated: <ul style="list-style-type: none"> a) revenue \$859 million including: <ul style="list-style-type: none"> - net sales equal gross sales from products and services minus returns, discounts and allowances. - revenues from financial investments includes cash received as interest on financial loans (mortgages). ▪ Economic value distributed b) Operating costs \$173 million (excludes employee wages) <ul style="list-style-type: none"> - cash payments made outside the organisation for services purchased c) Employee wages and benefits \$174 million <ul style="list-style-type: none"> - total payroll comprises employee salaries, including amounts paid to government institutions on behalf of employees. - Non-employees working in an operational role are not reported here but under operating expenses. 	N/A			Yes

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
		<ul style="list-style-type: none"> - Training for employees is not included and is reported in operating expenses. d) payments to providers of capital \$0 million (no dividend declared in 2017) e) payments to government \$152 million - all taxes and related penalties paid at the international and local levels. f) Community investments \$1m (donations only, does not include social procurement or management costs for this function) - voluntary donations to the broader community where the target beneficiaries are external to the organisation eg. Cerebral Palsy. <ul style="list-style-type: none"> ▪ Economic value retained (calculated as 'Direct economic value generated' less 'Economic value distributed') b. Profit at country level in 2017 was \$349 million 				

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
CATEGORY: ENVIRONMENTAL						
MATERIAL ASPECT: EMISSIONS						
G4-DMA	Disclosure of Management Approach	Our activities impact the environment. This includes the direct impact we have from the operations of our buildings, IT systems and business travel. However, our indirect impact on the environment is much greater through our financing portfolio and our procurement supply chain. Globally, we are committed to reducing our own footprint by 20% in 2020. We are also working closely with both customers and suppliers to help them adapt and take advantage of opportunities in the low-carbon economy of the future. Note: Emissions are not material according to our Materiality Analysis. However we believe it is our duty to report on our own direct environmental impact as climate change is one of the greatest global challenges of our time.	N/A			No
G4-EN15	Direct GHG emissions	See Appendix 10				No
G4-EN16	Energy indirect GHG emissions	See Appendix 10				No
G4-EN17	Other indirect GHG emissions	See Appendix 10				No
MATERIAL ASPECT: OVERALL						
G4-DMA	Disclosure of Management Approach	Our Approach to Materiality				No

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
G4-EN31	Total environmental protection expenditures and investments by type	Our systems at this time do not provide us with the capability to categorise expenditure based environmental protection expenditure.	Total environmental protection expenditures by: • Waste disposal, emissions treatment, and remediation costs • Prevention and environmental management costs	The information is currently unavailable	We are currently exploring ways that we can identify and separate costs associated with environmental protection.	No
CATEGORY: SOCIAL						
SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK						
MATERIAL ASPECT: EMPLOYMENT						
G4-DMA	Disclosure of Management Approach	ING Group employees play a key role in delivering on our purpose and Customer Promise. We believe in empowering employees to develop themselves and the competencies they need to succeed. Effective performance management is key to enabling employees to develop their full potential & to creating the company culture and skills we need to deliver on our strategy. In 2017, 96% of our employees engaged in performance management. Advanced analytic techniques are helping us gain more value from our employee and workforce data.	N/A			No

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
		Our goal is to make sure we understand what matters most to our people and how we can make a genuine difference in our human capital investments. We have implemented a global Employer Value Proposition to attract and hire the right employees. Job rotation, international assignments and job swaps help us to optimise our talent management strategy and provide opportunities for staff to grow by being exposed to new challenges in different parts of our organisation. The effectiveness of our approach and strategy is assessed during the evaluation of our performance against predetermined success measures.				
G4-LA1	Total number and rates of new employee hires and employee turnover by age group, gender and region	See Appendix 5	N/A			No
G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	ING does not differentiate benefits based on location. All benefits are applicable for full time and part time employees.	N/A			No
G4-LA3	Return to work and retention rates after parental leave, by gender	See Appendix 6	N/A			No

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
MATERIAL ASPECT: LABOR/MANAGEMENT RELATIONS						
G4-DMA	Disclosure of Management Approach	<p>We consider human rights as fundamental and universal for our workforce. We uphold the rights proclaimed in the Universal Declaration of Human Rights and aim to respect human rights in all our global operations. We uphold freedom of association for all our employees and recognise the right to collective bargaining as laid down by International Labour Organisation convention Nos. 87 and 98. We aim to judge our employees only on their merit and skills and it is our policy not to discriminate in areas including social origin, gender, age, background, sexual orientation, physical ability and religious beliefs. We always aim to treat employees with respect & communicate with them fairly and transparently. How we consult employees depends on local legislation and culture. At Group level, we aim to encourage local employee participation in countries where employee consultation is not already formally established. The labour market has become a global marketplace. With recruitment challenges in specific areas of expertise, we need to be able to tap cross-border markets to locate talent. Job rotation, international assignments and job swaps help us to optimise our talent management strategy and provide opportunities for staff to grow by being exposed to new challenges in different parts of our organisation.</p>				No

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
		Employees are encouraged to apply for any position or training that fits their skill and experience profile. We make all opportunities available via our internal job site, giving qualified internal employees preference over external candidates.				
G4-LA4	Minimum notice periods regarding operational changes, including whether these are specified in collective agreements	'Reasonable period after proposing introduction of change'. b. Notice period and provisions for consultation and negotiation as specified above in enterprise agreement.		The Standard Disclosure or part of the Standard Disclosure is not applicable	Notice period and provisions for consultation and negotiation are not specified in collective agreements.	No
ASPECT: TRAINING AND EDUCATION						
G4-DMA	Disclosure of Management Approach	We believe in empowering employees to develop themselves and the competencies they need to succeed. We need our people to have the right skills so we can deliver on our business strategy, offer top-class customer service and make it possible for them to develop their full potential. We encourage employees to take the lead in their own personal and career development. We allocate a budget for employees for training, professional development & personal development both at a central level for bankwide programs and also at individual department level for more tailored programs. The effectiveness of our approach and strategy is assessed during the evaluation of our performance against pre-decided success measures. In addition, financial institutions face constant competition for skilled employees. The ability to attract & retain employees is				No

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
		increasingly important, particularly where innovation is critical to the business strategy. To respond to this, ING provides opportunities for global mobility, professional development, active wellbeing program, and a global Innovation Bootcamp. These strategies aim to position ING as a top employer in order to attract the best talent to deliver the highest quality products and services for our customers.				
G4-LA9	Average hours of training per year per employee by gender, and by employee category	We do not currently track hours of training per employee across the whole organisation.	We do not currently track hours of training per employee across the whole organisation	The information is currently unavailable	We encourage employees to take the lead in their own personal & career development & allocate a budget for employees for training, professional development & personal devt.	No
G4-LA10	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	a. We do not currently track details of training programs on an individual employee basis across the organisation b. Outplacement is offered to all redundancies. In 2017 there were 3 redundancies across the organisation.	N/A			No
G4-LA11	Percentage of employees receiving regular performance and career development reviews, by gender and by emp.category	See Appendix 7	N/A			No

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
ASPECT: DIVERSITY AND EQUAL OPPORTUNITY						
G4-DMA	Disclosure of Management Approach	We aim to ensure that ING's employees are diverse and have equal career opportunities. We strive to create an inclusive corporate culture that welcomes, acknowledges, respects and benefits from each other's differences. At ING, we aim to accelerate the development of diversity, including in areas such as social origin, gender, age, background, sexual orientation, physical ability and religious beliefs. In particular, we aim to achieve an increase in the number of women in leadership positions.				No
G4-LA12	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	See Appendix 8	N/A			No
G4-DMA	Disclosure of Management Approach	It is our intention to establish a responsible approach to the wages and benefits of employees and senior management. We strive for a sustainable balance between short-term and long-term value creation, building on our long-term responsibility towards our clients, society and all other stakeholders. The primary objective of our remuneration policy is to retain and recruit highly qualified employees and bring new talent into the organisation. In determining compensation, we consider scope of responsibilities, complexity, alignment of risk and rewards, legislation and the long-term objectives of the company. Besides remuneration, employees frequently cite	N/A			No

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
		culture, development opportunities and other benefits as factors influencing their decision to join or remain with ING.				
ASPECT: EQUAL REMUNERATION FOR WOMEN AND MEN						
G4-LA13	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation	See Appendix 9	N/A			No
SUB-CATEGORY: PRODUCT RESPONSIBILITY						
MATERIAL ASPECT: PRODUCT AND SERVICE LABELING						
G4-DMA	Disclosure of Management Approach	A fair price for our products and services increases accessibility for our customers and is important for our competitiveness in the marketplace. ING is Australia's most recommended bank and as such customer advocacy is integral to the growth of our business. Our customers and other stakeholders trust ING to offer fair, straightforward and good value products. Our customers also expect us to be on hand 24/7 with easy digital accessibility. To do this we must deliver on our customer promise to "keep getting better" and deliver tools to give our customers control over their finances. With customer expectations changing rapidly we aim to be a leader in transforming banking, staying at the forefront of digital developments. We also believe banking should be about clear products, plain language, fair prices and simple processes. In support of our customer promise, we strive to communicate in a clear, easy and fair way. Our corporate tone of	N/A			No

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
		voice guidelines reflects a brand personality that is clear and easy, empathetic, positive and no-nonsense. ING monitors our Net Promoter Score monthly to better understand the level of customer satisfaction and advocacy. We use this data to inform allocation of resources within the business to best meet customer needs. For example, during 2017, customer surveys revealed customers were increasingly travelling overseas and buying from international websites. As a result ING stopped charging international transaction fees and also international ATM fees.				
G4-PR5	Results of surveys measuring customer satisfaction	Net Promoter Score 20.7 (as at December 2017)	N/A			No
MATERIAL ASPECT: CUSTOMER PRIVACY						
G4-DMA	Disclosure of Management Approach	As a digital Bank with no branches, ING's business is reliant on digital innovation and data security. Customer expectations, new technologies and new competitors are transforming the banking industry. As a result our customers need us to increase the pace of innovation. Our customers expect our digital systems will give them control over their finances and that their personal financial data is secure. Data privacy is a material topic for customers and other stakeholders. Customers expect us to know their needs and preferences and they need their personal data to be secure and not used for anything other than what they have given explicit consent for. The more we	N/A			No

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
		<p>know more about the customer. The more fairly we can price products and services. We are governed by binding Global Data Protection Policies (GDPPs) that ensure we comply not just with legal & regulatory requirements for data privacy but also take customers' wishes into consideration.</p> <p>Our approach can be summarised as: the right people use the right data for the right purpose. If we would like to use a customer's data to provide personalised services and offers to them, we will always seek their consent. In such cases, the customer can withdraw their consent at any time. ING is continuously investing in its security organisation and systems in order to protect the data of customers. Global Data Protection Policies (GDPPs), which qualify as Binding Corporate Rules, have been adopted by all business units. In each business unit, a data protection executive (DPE) is responsible for maintaining GDPP compliance. Local data protection officers (DPOs) provide practical and technical support. We take a holistic approach to counter the complex and constant threat of cybercrime by combining prevention with detection and rapid response. Our Cybercrime Resilience Programme was implemented in 2014 and is continually updated to incorporate the latest technologies which has increased our resilience against e-fraud, advanced persistent threats and distributed denial-of-service (DDoS).</p>				

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DMA and Indicators	Description	Disclosure	Identified Omission(s)	Reason(s) for Omission(s)	Explanation for Omission(s)	External Assurance
		attacks The advanced analytics capabilities that we are developing to better understand and service customers also play a key role in combatting criminal activity. Pattern recognition and advanced algorithms help in predicting and detecting, and therefore preventing, fraudulent activity. More information ING Values and FEC Statement . Data Security effectiveness is measured via tracking of the number of reported vulnerabilities that are remediated.				
G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	a.i) No complaints initiated from parties other than regulators, and substantiated by the organisation and reported to at least 1 regulatory body (i.e. FOS or the Privacy Commissioner) concerning breaches of customer privacy; a.ii) No complaints initiated from a regulator and substantiated by the organisation concerning breaches of customer privacy; b. No identified leaks, thefts and losses of customer data that is reportable under regulatory standards (breach of the Privacy Act or Privacy principles)	N/A			No
SUB-CATEGORY: OWN INDICATORS						
MATERIAL ASPECT: SYSTEM AVAILABILITY						
	Disclosure of Management Approach	Our Response to Material Issues				No
MATERIAL ASPECT: FINANCIAL EMPOWERMENT						
	Disclosure of Mgmt Approach	Our Response to Material Issues				No

Appendix 1

G4-10

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a. Report the total number of employees by employment contract and gender.

	M	F	Total
Permanent	599	614	1213
Fixed Term	14	19	33
Temporary	223	66	289
TOTAL	836	699	1535

b. Report the total number of permanent employees by employment type and gender.

	M	F	Total
Full Time	591	509	1100
Part Time	8	105	113
TOTAL	599	614	1213

c. Report the total workforce by employees and supervised workers and by gender.

	M	F	Total
Full Time	591	509	1100
Part Time	8	105	113
TOTAL	599	614	1213

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d. Report the total workforce by region and gender.

	M	F	Total
South Australia	2		2
Queensland	7	4	11
International	94	25	119
Victoria	9	4	13
Western Australia	4	1	5
New South Wales	720	665	1385
TOTAL	836	699	1535

e. Report whether a substantial portion of the organization's work is performed by workers who are legally recognized as self-employed, or by individuals other than employees or supervised workers, including employees and supervised employees of contractors.

Not applicable

f. Report any significant variations in employment numbers (such as seasonal variations in employment in the tourism or agricultural industries).

Not applicable

Appendix 2

G4-11

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- a. Report the percentage of total employees covered by collective bargaining agreements.

Covered/Not Covered	%
Covered by Agreement	95%
Not covered by agreement	5%
Total	100%

Appendix 3

G4-12

Processes and Internal Controls

Sourcing Process

Principle: *A proper due diligence process should be followed as part of any sourcing decision.*

1.1.1 Specification

A specification is a statement of the attributes of a product, process or service a Business Owner wishes to purchase, and consequently, which a supplier is expected to supply. It is the Business Owner's responsibility for the specification definition and preparation.

It is firstly critical to determine whether the service is classified as Outsourcing which is jointly performed by Business Owner, Procurement and Compliance professional assessment.

1.1.2 Sourcing Strategy

Agreed jointly between the Business Owner and Procurement, or the working group, business objectives need to be clearly defined as this will determine the best procurement approach i.e. what are the guiding principles, alternative suppliers considered, benchmark and/ or Request for Proposal ("RFP").

1.1.3 Supplier Selection

Supplier selection must be a joint decision between the Business Stakeholders and Procurement.

Supplier Qualification – Procurement is responsible

Any decision made is subject to successful completion of any SQ. Procurement will initiate SQ process via standard SQ request mail to ING Bratislava as defined in the SQ procedure manual.

Completing this SQ is mandatory before the start of the relationship for all new engagements where the anticipated spend for the first 12 month is above a threshold of AUD 20,000 (incl. GST).

For contracts below AUD 20,000 (incl. GST), or for inactive business partners, no SQ or screening against ING mandatory screening lists as per Financial Economic Crime ("FEC") and Anti-Bribery and Corruption Sub- Policy is required unless the Business Owner and Procurement deem it necessary (i.e. where it is Outsourcing).

Capability due diligence – Business Owner is responsible

Appropriate further due diligence (i.e. Capability to comply with its obligations under the outsourcing Agreement) on the proposed Service Provider(s) ensuring that it is able to provide the outsourced services to IBAL in accordance with ING's Standards and Policies is mandatory for all Outsourcing engagements. For other engagement further due diligence is recommended, however it will be carried out at the Business Owner's discretion. The Supplier Due Diligence Guidelines (available on Procurement Intranet) should be referred to for relevant questions and authorised approvers.

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1.1.4 Contract Negotiation

Any negotiation with a supplier should be done collaboratively between Procurement and appropriate internal stakeholders.

This includes (but not limited to):

- Commercial considerations
- Service Level Criteria
- Work order
- Payment terms

The selection of a supplier will be a joint approach, and if consensus cannot be reached, the final decision will be escalated to the next highest level.

1.1.5 Contracting

This starts with creating a Contract for the agreed term and maintaining the relationship throughout the contract term.

Where reasonably practicable, contract terms should be executed on IBAL standard terms, which will be updated by IBAL legal counsel, on a regular basis, as required.

If the contract is an outsourcing arrangement, then additional mandatory requirements need to be included in the outsourcing contract. For material outsourcing arrangements, then specific additional requirements as per CPS231 requirements, will also need to be included.

1.1.6 Contract Signing

Every Master Services Agreement ("MSA")/ Professional Services Agreement ("PSA") or contract name with a similar purpose must be executed by two EXCO members, after the Document Approval & Execution Form ("DAE") has been signed off by each required business function.

Statements of Work do not require a DAE form or execution under the Executive PoA provided that:

- the Master Services Agreement (or similar) to which the Statement of Work relates has been validly approved and executed as a Financial Contract; and
- the Statement of Work does not vary the terms and condition of the Master Services Agreement (or similar) to which it relates.
- A requisition has been raised.

The Power-of-Attorney ("POA") and DAE Sub Policy lists the requirements to be fulfilled to execute IBAL's contracts.

If a Material Outsourcing arrangement is contemplated, the arrangement must be approved by either the CEO or EXCO.

The fully executed Agreement needs to be returned to Procurement for filing and uploading into the PeopleSoft contracts management system.

Contract Management – Managing Supplier Relationships

Principle: *The Business Owner is responsible for managing the day to day performance of the supplier.*

Procurement will be responsible for maintaining the contracts database. Procurement will run a regular report to manage all expiring contracts and engage with the Business owner to determine what course of action will be undertaken.

Material Outsource Suppliers

Jointly with the Business Owner, Procurement will attend quarterly supplier review meetings to assess supplier performance.

All Material Business Activity (as defined under APRA CPS 231) supplier management requirements will be annually assessed by the Business Owner and Procurement. This includes an annual RCSA.

Procurement will monitor all material outsourcing providers by way of an Outsourcing Dashboard to ensure the governance of material outsourced services is properly managed.

Request to Pay (“RtP”)

Principle: *All goods and services purchased must have an approved Purchase Order (PO) before delivery and supplier invoice.*

This includes from Request Management (raising requisition) through to Invoice Payment Management as defined in the RtP procedure manual.

A mandatory four-eyes principle has been adopted for this process. The Business Owner is required to follow and comply with the implemented PeopleSoft system as described in the RtP Process Guidelines published on IBAL Intranet. No DAE form is required under this scenario.

- The exception to this applies for the following type of services: Regulatory payments

All Requisitions/PO's raised should be raised prior to committing to the spend and must have relevant supporting documents attached i.e. Supplier quotation/proposal, SOW established from the Contract to Request process. A supplier invoice is not acceptable.

Procurement monitors and reports maverick buying (contract signing and/or purchasing without timely involvement of Procurement & purchasing without a purchase order) to the Head of the related Business Unit. Procurement keeps a list of the maverick buying cases in the local organisation. Local Procurement should review the maverick buying list on monthly basis and report it to responsible management. Escalation can be made where necessary to the Global CPO.

Reporting

Principle: *The procurement function will provide periodic reporting to the stakeholders across the business.*

The Procurement Function is responsible for the collection, analysis and production of various reports. The primary audience and associated reporting undertaken is as follows:

Audience	Reporting
IBAL Board of Directors	- New Material Business Activity Agreements
ING Bank Procurement (IBP)	- Monthly Benefit Report - Monthly Dashboard of KPIs - Quarterly Outsourcing Dashboard - Zucus Quarterlu Spend Report
Executive Committee	- New / terminated Material Business Activity Agreements - Annual Benefit Report
Non-Financial Risk Committee	- Monthly Key Risk Indicators ("KRI's") - Outsourcing Dashboard (once a year)

Examples of elements that may define the structure and characteristics of an organization's supply chain include:

- Sequence of activities or parties that provides products and services to the organization
Pls. see above
- Total number of suppliers engaged by the organization and estimated number of suppliers in the supply chain
712 total number of suppliers utilised for the provision of products and services. Est. 30% suppliers are from outsourcing supplier arrangements
- Location of suppliers by country or region
93% suppliers located in Australia. 7% non-Australian global countries

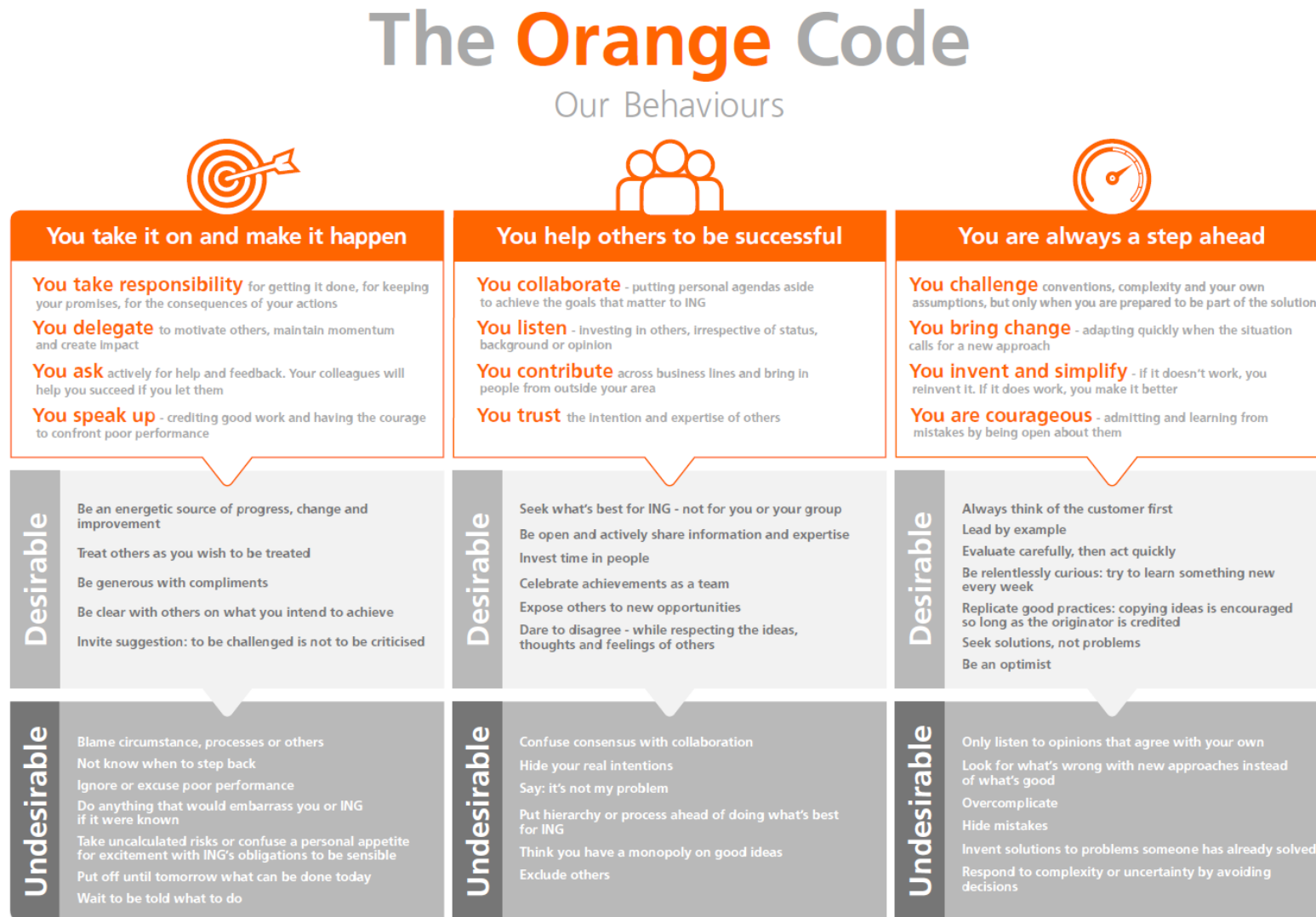
ING AUSTRALIA GRI REPORTING TABLE 2018

- Types of suppliers (such as contractors, brokers, wholesalers, licensees). See the definition of supplier for examples of suppliers
Variety of suppliers depending on the service provided to ING
- Estimated monetary value of payments made to suppliers
Supplier spend estimated AUD 198M/pa
- Sector-specific characteristics of the supply chain (such as labor intensive)
FM & Travel and Expenses, Generic IT, IT & Operations, Marketing & Communications, Professional Services, Insurance

Appendix 4

G4-56

- a. Describe the organization's values, principles, standards and norms of behaviour such as codes of conduct and codes of ethics.



Appendix 5

G4-LA1

ING AUSTRALIA GRI REPORTING TABLE 2018

a. Report the total number and rate of new employee hires during the reporting period, by age group, gender and region.

	Hires	Active	Rate
18-24	52	93	56%
25-34	124	433	29%
35-44	76	420	18%
45-54	35	186	19%
55-64	3	73	4%
65+		8	0%
TOTAL	290	1213	24%

	Hires	Active	Rate
M	158	599	26%
F	132	614	21%
TOTAL	290	1213	24%

	Hires	Active	Rate
South Australia	1	11	9%
Queensland		2	0%
International		12	0%
Victoria		13	0%
Western Australia		5	0%
New South Wales	289	1170	25%
TOTAL	290	1213	24%

ING AUSTRALIA GRI REPORTING TABLE 2018

b. Report the total number and rate of employee turnover during the reporting period, by age group, gender and region.

	Leavers	Active	Rate
18-24	27	93	29%
25-34	89	433	21%
35-44	65	420	15%
45-54	32	186	17%
55-64	13	73	18%
65+	6	8	75%
TOTAL	232	1213	19%

	Leavers	Active	Rate
M	127	614	21%
F	105	599	18%
TOTAL	232	1213	19%

	Leavers	Active	Rate
South Australia	1	11	9%
Queensland		2	0%
International		12	0%
Victoria		13	0%
Western Australia	1	5	20%
New South Wales	230	1170	20%
TOTAL	232	1213	19%

Appendix 6

G4-LA3

ING AUSTRALIA GRI REPORTING TABLE 2018

a. Report the total number of employees that were entitled to parental leave, by gender.

Gender	#
M	599
F	614
Total	1213

b. Report the total number of employees that took parental leave, by gender.

Gender	#
M	32
F	72
Total	104

c. Report the total number of employees who returned to work after parental leave ended, by gender.

Gender	#
M	30
F	61
Total	91

d. Report the total number of employees who returned to work after parental leave ended who were still employed twelve months after their return to work, by gender.

Gender	#
M	30
F	61
Total	91

e. Report the return to work and retention rates of employees who took parental leave, by gender.

Gender	#
M	94%
F	85%
Total	88%

Appendix 7

G4-LA11

ING AUSTRALIA GRI REPORTING TABLE 2018

a. Report the percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.

Performance Review				Total Staff				Percentage			
Category	M	F	Total	Category	M	F	Total	Category	M	F	Total
EXCO	4	2	6	EXCO	6	3	9	EXCO	67%	67%	67%
Senior Management	30	17	47	Senior Management	35	23	58	Senior Management	86%	74%	81%
Management	92	44	136	Management	95	48	143	Management	97%	92%	95%
Staff	403	529	932	Staff	438	526	964	Staff	92%	101%	97%
Sales	32	15	47	Sales	25	14	39	Sales	128%	107%	121%
Total	561	607	1168	Total	599	614	1213	Total	94%	99%	96%

Appendix 8

G4-LA12

ING AUSTRALIA GRI REPORTING TABLE 2018

Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity

	EXCO & Board
under 30 years old	0
30 - 50 years old	8
over 50 years old	5
Total	13

	All Staff	EXCO	Senior Management	Management	Staff	Sales
M	599	6	35	95	438	25
F	614	3	23	48	526	14
Total	1213	9	58	143	964	39

	All Staff	EXCO	Senior Management	Management	Staff	Sales
under 30 years old	265		1	14	241	9
30 - 50 years old	795	8	48	105	613	21
over 50 years old	153	1	9	24	110	9
Total	1213	9	58	143	964	39

Appendix 9

G4-LA13

ING AUSTRALIA GRI REPORTING TABLE 2018

a. Report the ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation.

	Total		Customer Delivery		Customer Propositions		Finance		General Management		Human Resources		Project Delivery		Information Technology		Operations		Risk		Wholesale Banking	
Ratio %	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
EXCO	100	101																				
Senior Management	100	87	100	na	100	73	100	95	100	74	100	123	100	na	100	na	100	87	100	96	100	136
Management	100	83	100	71	100	88	100	101	na	na	na	100	100	87	100	80	100	102	100	117	na	na
Staff	100	74	100	89	100	91	100	88	100	71	100	66	100	92	100	83	100	88	100	108	100	47
Sales	100	91	100	91	na	na	na	na	na	na	na	na	na	na	na	na	na	na	na	na	na	na

b. Significant locations of operation is taken as being Australia

Appendix 10

G4-EN15

ING AUSTRALIA GRI REPORTING TABLE 2018

	Measure	Jan to Dec 2014	Jan to Dec 2015	Jan to Dec 2016	Jan to Dec 2017
Scope 1	Tonnes CO2	0	n/a	n/a	364.13
Scope 2	Tonnes CO2	4,120	3,411	2,987	1,268.41
Scope 3	Tonnes CO2	573	770	697	2,951.00
Total electricity	kWh	5,163,036.94	4,274,552.57	3,743,636.00	3,352,180.08
Non-renewable electricity	kWh	5,163,036.94	4,274,552.57	3,743,636.00	3,352,180.08
Non-renewable electricity used?	yes/no	yes	yes	yes	yes
Renewable electricity	kWh	n/a	n/a	n/a	n/a
Reason for not purchasing renewable electricity	Option - Renewable electricity	It is considered too expensive	There is no renewable electricity available	There is no renewable electricity available	There is no renewable electricity available
Renewable electricity used?	yes/no	no	no	no	no