Particulars

About Your Organisation

1.1 Name of your organization ING Bank N.V.						
☐ Oil Palm Growers						
☐ Palm Oil Processors and/or Traders						
☐ Consumer Goods Manufacturers						
☐ Retailers						
■ Banks and Investors						
☐ Social or Development Organisations (Non Governmental Organisations)						
☐ Environmental or Nature Conservation Organisations (Non Governmental Organisations)						
☐ Affiliate Members						
☐ Supply Chain Associate						
3 Membership number						
0019-15-000-00						
4 Membership category						
rdinary						
5 Membership sector						
anks and Investors						

Banks and Investors

Operational Profile

	☐ Retail / Private Banking
	☐ Investment / Equity
	☑Debt / Capital Market
	☐ Capital Market Advisory Service
	Other
perat	ions in Palm Oil
2.1 WI	nat are the various types of financial services to the palm oil sector provided by your organization?
	☑Lending / Loans
	Leasing
	☐ Cash Management Products
	□Investments
	□Insurance
	Other
2.2 ***	Africa Australasia Europe North America South America Middle East China India Indonesia Malaysia
Palm C	☐ Rest of Asia
aiiii C	
	es your organization have a lending or investment policy on palm oil?
3.1 Do Yes	

3.2 Which sectors does your palm oil policy cover?					
 Growers					
☑Traders					
✓ Processors					
3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and oil palm products and/or RSPO certification?					
Yes					
3.4 Do you have a policy that require all your palm oil customers to be RSPO members?					
No .					
3.4.1 Do you plan to develop such a policy?					
Yes					
3.5 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?					
Yes					
3.6 When do you expect to require grower customers to be 100% RSPO certified?					
2020					
3.7 When do you expect to require customers in other sectors to be 100% RSPO certified?					
2030					
3.8 In which countries/regions that your organisation operates, do the above commitments cover?					
□Africa					
□Australasia					
□Europe					
□ North America					
☐ South America					
☐ Middle East					
□China					
□India					
□Indonesia					
□Malaysia					
☐ Rest of Asia					

3.9 What measures do you take if a client is not meeting the requirements of your policy on palm oil?

ING applies an Environmental Social Risk (ESR) policy framework to its business engagements. One policy in the ESR framework is the Sector Policy for Forestry and Agrocommodities, which applies to all products and services offered by ING to entities operating in the forestry and agrocommodities sector, including palm oil.

1) Business engagements in the palm oil sector will require companies that own, operate or manage palm oil plantations demonstrating to the satisfaction of ING compliance with RSPO certification. The answer "Yes" at 3.5 refers to this type of companies. This means that companies that own, operate or manage palm oil plantations will have to describe how they operate in line with the P&C of the RSPO.

If a company owns, operates or manages palm oil plantations which do not comply with the RSPO certification, then ING engages the company on the reasons for such non-compliance. Afterwards, we require the company to have a time-bound plan to achieve RSPO certification for all the plantations under its operational control. We will then assess the client's commitment and progress towards full RSPO certification.

In case our financing is in scope of the Equator Principles and directly supporting the development of palm oil plantations, ING requires compliance with the P&C of the RSPO certification and with the IFC environmental, health, and safety guidelines for vegetable oil production and processing.

In these cases, we cover impacts on the areas mentioned in the answers shown later at point 6.1, if applicable to the specific plantation.

2) ING promotes the use of best practices with its clients.

ING also promotes the RSPO certification with companies that buy or trade palm oil products, but do not own, operate or manage palm oil plantations. For such companies ING promotes RSPO membership, but we do not require it.

Therefore, the answer "No" at 3.4 refers to companies that do not own, operate or manage palm oil plantations.

3.10 Do you proactively engage with your customers to support and ask them to join the RSPO?

Yes

3.11 What other activities have you undertaken in the reporting year to promote RSPO certified sustainable palm oil and oil palm products?

1) Engagement

ING has resources in risk and front office departments that are trained to engage clients in the palm oil sector and discuss relevant topics, when necessary. We discuss how we can support clients in realizing their RSPO certification' objectives and solve potential environmental or social issues affecting their operations.

2) Conferences

ING participated in two conferences of the EPOA (Eurepean Palm Oil Alliance) in Amsterdam and Milan. These conferences explored tools to support the EU uptake of 100% CSPO by 2020. Here we exchanged knowledge and ideas on how to increase CSPO uptake. We support the active role of the financial sector to support this result. In addition ING attended the Responsible Business Forum on Food & Agriculture, held in Jakarta Indonesia, from 27-28March of 2018.

3) Collaboration with the Dutch Government

ING is also liasing with the Dutch Government to find solutions to reach the objective of 100% CSPO sourced by the EU by 2020.
4) Financial Institution Task Force

ING is a member of the Financial Institutions Task Force working group of the RSPO. Here Financial Institutions share sector knowledge and feedback on board dicussions. The Task Force also does outreach to local regional operating banks and hosts consultants that share advancements related to tools to manage and assess Environmental and Social risks in the palm oil supply chain

Actions for Next Reporting Period

4.1 Outline actions that will be taken in the coming year to promote RSPO certified sustainable palm oil and oil palm products

ING will continue to support the objectives of the RSPO by promoting RSPO membership and certification amongst the palm oil actors in the supply chain and the Financial Institution sectors.

Reasons for Non-Disclosure of Information

5.1 If you have not disclosed any of the above information, please indicate the reasons why

Application of Principles & Criteria for all members sectors

6.1 Regarding your investment policies, d	o you have position s	statements and/or polic	cies related to de	alings in the palm
oil industry that are in line with RSPO P&	C. such as:			

■Water, land, energy and carbon footprints Uploaded file: F-Policies-to-PNC-waterland.pdf					
Related link: https://www.ing.com/ING-in-Society/Susta	inability/Our-Stance/Palm-oil.htm				
✓ Land Use Rights Uploaded file: F-Policies-to-PNC-landuseright.pdf					
Related link: https://www.ing.com/ING-in-Society/Susta	inability/Our-Stance/Palm-oil.htm				
☑Ethical conduct and human rights Uploaded file: F-Policies-to-PNC-ethicalconducthr.pdf					
Related link: https://www.ing.com/ING-in-Society/Susta	inability/Our-Stance/Palm-oil.htm				
✓ Labour rights Uploaded file: F-Policies-to-PNC-laborrights.pdf					
Related link: https://www.ing.com/ING-in-Society/Susta	inability/Our-Stance/Palm-oil.htm				
	ent.pdf				
Related link: https://www.ing.com/ING-in-Society/Susta	inability/Our-Stance/Palm-oil.htm				
☐None of the above					
Financial institutions are not directly involved in the production, processing or trading of palm oil products. ING ESR policies are directed to manage the Environmental Social risks linked to financial services we provide to our clients in the palm oil supply chain. We are committed to engage clients in the palm oil supply chain whenever there are improvements to be made from an Environmental and Social perspective. Uploaded files: No files were uploaded					
CHC Factoriat					
GHG Footprint					
7.1 Are you currently reporting any GHG footprint?					
Yes					
Uploaded files: F-GHG_assessment.pdf					
Link to Website Please see page 349-351					
N.					
No					
Please explain why					
Support Smallholders					
8.1 Are you currently supporting any independent smallholder groups?					

No

8.2 Do you have any future plans to support independent smallholders?						
Yes						
8.3 When do you plan to start your support for independent smallholders						
2020						

Challenges

1 What significant economic, social or environmental obstacles have you encountered in the production, procurement, use and/or promotion of CSPO and what efforts did you make to mitigate or resolve them?

We see the uptake of CSPO in Asian countries as a challenge to increase the use and procurement of CSPO, but we are informed by the RSPO that China in particular makes progress by adopting RSPO standards. We are also seeing challenges linked to the capacity of the RSPO to certify a growing number of plantations and monitoring the performance of the plantations. This challenge is linked to the fact that the capacity of the auditing companies probably needs to be increased. We would like to further discuss the process of screening independent auditors/assessors by the RSPO. In addition to certain conferences, ING makes efforts to participate in the RSPO AGM meetings. These occasions and the active participation in the RSPO FITF allows us to support initiatives and tools that can increase use, trade and production of CSPO. We will remain engaged with these initiatives to share knowledge and support these efforts.

2 In addition to the actions already reported in this ACOP how has your organization supported the vision of RSPO to transform markets in other ways? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

Please refer to 3.9, 3.11 and 4.1. We engage with clients, NGO's, RSPOs, peer banks and other relevant stakeholders. For some clients we arrange green bonds as well as facilities of which the terms are linked to their suistainability performance. For specific referrals RSPO promotion please visit: https://www.ing.com/ING-in-Society/Sustainability/Our-Stance/Palm-oil.htm

3 File -Please attach or add links to any other information from your organisation on your policies and actions on palm oil (EG: sustainability reports, policies, other public information)

• No files were uploaded

Link: https://www.ing.com/ING-in-Society/Sustainability/Our-Stance/Palm-oil.htm