

Particulars

About Your Organisation

Organisation NameING Bank N.V.

Corporate Website Addresswww.ing.com

Primary Activity or Product

- Finance
-

Related Company(ies)No

Membership

Membership Number	Membership Category	Membership Sector
5-0019-15-000-00	Ordinary	Banks and Investors

Banks and Investors

Operational Profile

1.1 Please state what your main activities are within finance*

- Corporate / Commercial
 - Trade Finance
 - Retail / Private Banking
-

Operations in Palm Oil

2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
 - Lending / Loans
-

2.2 What geographic regions do you operate in for the palm oil business?

- Worldwide
-

Palm Oil Policy

3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

Uploaded files:

- [F-Lending-Policy.pdf](#)
-

3.2 Which sub-sectors does your palm oil policy cover?

- Traders
 - Processors
-

3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

3.3.1 Do you require your customers to be RSPO members?

No

3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?

Yes

3.4 What measures do you take if a client is not meeting the requirement 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 to demonstrate to the satisfaction of ING compliance with RSPO certification. The answer "Yes" at 3.3.2 refers therefore 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 8.1, 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 3.3.1 refers to companies that do not own, operate or manage palm oil plantations.

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

Yes

Time-Bound Plan**4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

4.2 When do you expect to require 100% certification for growers?

2020

Comment:

All our customers that own, operate or manage palm oil plantations are RSPO members or are in the process of getting RSPO certification for all their plantations. When we collaborate with plantation owners, we strive to work towards a plan in which we require them to have all their plantations certified within a commonly agreed date. However such date changes according to the specific operational situation of the company. So the date indicated in the answer 4.2 ("2020"), is only an indicative date.

4.3 When do you expect to require 100% certification for other sectors?

2030

Comment:

ING has not specified a date for 100% certification for companies operating in "other sectors". The date mentioned under the answer 4.3 ("2030") is therefore indicative. Although ING collaborates with non-growers in the palm oil supply chain (e.g. traders, processors, manufacturers, wholesalers or retailers), the certification commitments of such companies depend on how effectively they implement such requirements. Downstream companies can exercise positive influence on the palm oil supply chain, however this depends on their market position and advancement on sustainability commitments.

4.4 Which countries that your institution operates in do the above commitments cover?

- Applies Globally

4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?

Engagement 1) 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 realising their RSPO certification objectives and solve potential environmental or social issues affecting their operations. 2) ING participated in two conferences of the EPOA (European Palm Oil Alliance) in Amsterdam and Milan during 2015. These conferences explored tools to support the EU uptake of 100% CSPO within 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. 3) Collaboration with the Dutch Government ING is also liaising with the Dutch Government to find solutions to reach the objective of 100% CSPO sourced by the EU within 2020. 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 discussions. 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.

GHG Emissions**5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

Do you publicly report the GHG emissions of your operations?

Yes

Uploaded file:

[F-GHG-Public-Report.pdf](#)

www.ing.com/web/file?uuid=edb1ce3f-532f-4ddb-a58f-c91c6212d37e&owner=b03bc017-e0db-4b5d-abbf-003b12934429&contentid=36989

Do you publicly report the GHG emissions of your operations?

Yes

www.ing.com/web/file?uuid=edb1ce3f-532f-4ddb-a58f-c91c6212d37e&owner=b03bc017-e0db-4b5d-abbf-003b12934429&contentid=36989

Actions for Next Reporting Period**6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

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 sector, especially for local stakeholders.

Reasons for Non-Disclosure of Information**7.1 If you have not disclosed any of the above information please indicate the reasons why****Application of Principles & Criteria for all members sectors****8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:**

- Water, land, energy and carbon footprints
- Land Use Rights
- Ethical conduct and human rights
- Labour rights
- Stakeholder engagement

8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?

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.

8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?

No

Please explain why:

ING clients operating or owning palm oil plantations have to commit to comply with the P&C of the RSPO. Currently we do not provide incentives to such companies.

8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?

We apply the ING ESR framework to all customers as benchmark, including to clients in the palm oil sector. This is done through our Forestry and Agricommodities policy and the Equator Principles. Benchmarking is undertaken at least annually during the annual review of our clients' performance. When necessary, we also assess progress through direct client interaction and publicly available information. Our internal processes apply a client assessment covering how well the company is managing its Environmental and Social impacts. This process apply to all new and existing corporate clients. Through this assessment, we benchmark the organisation against the ING ESR Framework and against its RSPO commitments, if the company operates palm oil plantations. Additionally, our internal processes cover the assessment of the Environmental and Social risks triggered by all lending transactions to corporations active in the palm oil sector. Through this assessment, we benchmark the purpose of our transactions against the ING ESR Framework and against its RSPO commitments.

Concession Map**9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)****Do you agree to share your concession maps with the RSPO?**

No

Please explain why

We do not own concession maps, as Financial Institutions are not directly involved in the production or processing of palm oil products.

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?

The demand of Palm Oil from Asian countries is rising constantly and this demand covers now a significant part of Palm Oil products sold. We see the uptake of CSPO in Asian countries (e.g. China, India) as an obstacle to increase the use and procurement of CSPO. 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 already certified. This challenge is linked to the fact that the capacity of the auditing companies has to be increased. In addition to the two EPOA conferences, ING also participated to the November RSPO AGM meeting of 2015. 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 How would you qualify RSPO standards as compared to other parallel standards?

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Cost Effective:

Yes

Robust:

Yes

Simpler to Comply to:

Yes

3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

Please see above answers at points 4.5; 8.1 and 'Challenges" (1.).

4 Other information on palm oil (sustainability reports, policies, other public information)

Nil