

ING Recruitment Code

General

The ING Recruitment Code is a code of conduct and contains the principles that in the opinion of ING should be observed by ING and applicants during the recruitment and selection process. The purpose of the code is to provide a standard for a transparent and fair recruitment and selection process.

The Recruitment Code is without prejudice to the provisions in the CLA and the Social Plan regarding job applications.

The Recruitment Code is applicable to our recruitment process for all candidates, regardless whether they apply from outside the ING organization or apply for a vacancy as an internal candidate.

This Recruitment code is aligned with EU directives and Dutch legislation.

Applicants definitions

Internal applicants: ING employees with an employment contract with any legal ING entity worldwide.

External applicants: all applicants who do not have an employment contract with any legal ING entity worldwide.

Please note: A contingent worker who works at ING is an external applicant.

Principles

The Recruitment code is based on the following underlying principles:

- The applicant has a fair chance at being appointed at the position. This means equal opportunity and equal pay based on equal ability, ING will choose based on suitability with respect to the position;
- The applicant will be fully informed of the application process, and the content details including the function level of the vacant position;
- ING will request and use only that information that is needed to assess suitability for the position;
- The applicant will provide ING with the information that it needs to form a trueful picture of the applicant's suitability for the vacant position and of the applicant's professional

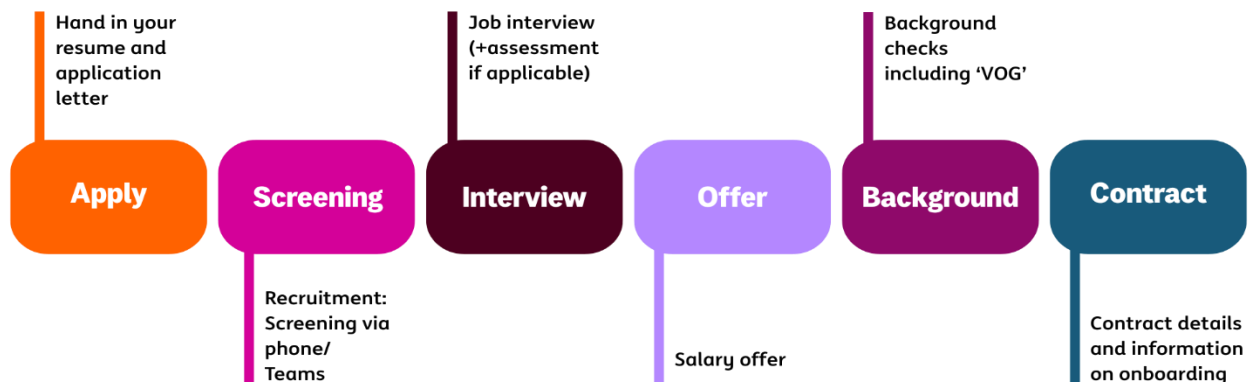
competence (education, knowledge and experience) and will not withhold information that the applicant knows or ought to know is important to the fulfilment of the vacancy for which the applicant is applying;

- All information provided by the applicant will be treated confidentially and with due care. The applicant's privacy will be respected in accordance with legal provisions;
- Both the applicant and ING are aware that information available from open sources such as the internet and information obtained from third parties is not always reliable. ING will only consult an open source for so-called sensitive positions. This will be made transparent in the vacancy. Information that is obtained will be discussed with the applicant with reference to the source and ING is transparent about the obtained information;

If ING requires further information from third parties, including from other ING departments or further research is necessary, ING will only do so in prior consultation with the applicant. Information obtained from third parties hereafter will be discussed with the applicant with reference to the third-party source.

The process

Our high over process flow:



A vacancy contains relevant details of the position. This will include:

- the duties and responsibilities relevant to the position,
- the requirements related to professional competences (education, knowledge and experience),
- behavioral- and personal skills,
- the level and place of the position within ING,
- salary range of the position,
- the nature of the employment,
- working hours, duration and work location.

The vacancy will be posted only internally for a minimum period of 5 working days before it is decided to offer it externally. This period of 5 working days is aligned with the Social Plan-procedure for priority candidates.

If in all reasonableness no suitable candidates are expected to apply to the internal posting due to the nature of the position and job requirements, ING retains the right to start the internal and external recruitment process at the same time. This does not have any consequences for the position of priority candidates.

Application

Applying is done online. All applicants apply via the career page on the ING website.

Next to a motivation letter, ING will request the candidate to upload relevant information such as education, diplomas, employment history and experience.

The candidate will be informed by ING on the proceeding of the process. ING aims to respond to everyone within two weeks, to ensure that the process from recruitment to hiring in principle takes no longer than three months to complete. Should a candidate be rejected at any stage of the job application process, ING aims to inform the candidate in writing as soon as possible.

Hiring process

Every selection process consists of 3 steps.

1. Job Analysis.

Key responsibilities and challenges are translated into technical and behavioral competences and skills which are used as selection criteria. The selection criteria will be combined with ING's so called Orange Code. The Orange code is a declaration of who we are at ING and what we expect from one and another when we turn up to work every day. In other words it is a set of standards that we collectively value, strive to live up to and invite others to measure us by. With these selection criteria candidates will be assessed.

2 Interviewing according to the so-called 2by2 approach.

ING strives to do two interviews on two topics (one technical and one behavioral) with two different interviewers each time. This is an objective way of assessing candidates. During the interviews candidates also get the chance to ask questions themselves.

3 Calibration/Evaluation.

To select the best qualified candidate, ING compares and integrates all information gathered during the two interviews. The interviewers will be filling in an evaluation form per candidate and based on the discussion between interviewers they will come to a general evaluation and score. This will make comparing all candidates easier and selecting the most suitable candidate unbiased.

Background check

ING will inform candidates on any additional selection procedures and/or methods (such as psychological tests and/or assessment), a pre-employment medical examination insofar as this is in accordance with the Medical Examinations Act, and / or a mandatory background check.

At the end of the application process a pre-employment screening is performed to manage the security risks. ING will check the information provided by the applicant, and the candidate is asked to provide a Certificate of Conduct (VOG).

An additional security screening may be required for certain positions. The purpose of this extra security screening is to assess the morals and integrity of the candidate in relation to the respective position. ING will inform the candidate when this is part of the process.

The costs of any screening will be borne by ING. The candidate can always decide to withdraw the application and not give ING permission to perform a security screening.

New employees who join ING from outside the company will be required to take the Banker's Oath within three months of their first day of work.

Internal transfer

We request from ING employees transferring to a new position internally to inform their manager at the earliest stage about the potential move to ensure that the organization can respond to the change in a timely manner. If the employee is hired, the transfer is formalized by recording the agreements reached in a job offer.

Unless otherwise agreed, the notice period included in the employee's individual employment contract applies as the starting point for determining the transfer date to the new position. The current and new manager can, however, make other arrangements in consultation with the employee with a view to ensuring the continuity of operations.

Complaints procedure

If the applicant is of the opinion, that ING has acted in breach of the provisions of this code, the applicant can lodge a written complaint to The ING Job Application Code Complaints Committee via e-mail to employeerelations@ing.com, stating the name and number of the vacancy.