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2006

ING Group

Corporate Responsibility Report



Performance Report

Contents

This year we are publishing two separate documents that together form ING's Corporate Responsibility Report 2006. 'The Big Picture' highlights the Corporate Responsibility (CR) topics that were most important to our stakeholders and our businesses. The 'Performance Report' is a web-based report that gives more detailed information on ING's performance in the field of CR. With this approach we aim to meet the various information needs of different groups of readers for more tailor-made information. (GRI 3.11)

GRI Indicators

The performance indicators of the Global Reporting Initiative (G3) and Financial Sector Supplement (Social Performance) are included in brackets throughout this document after the relevant information. For more information on G3 please see pages 6 and 7 of this report.

General	
Our strategy on corporate responsibility	3
Progress report	3
Organisational profile	5
Our approach to reporting	6
Governance and Compliance	8
Stakeholder engagement	10
Our Business	
Insurance	13
Banking	14
Asset Management	18
Performance Indicators	
Economic performance	20
Social performance (Labour conditions, Human rights, Society, Customers)	22
Environmental performance (CO ₂ footprint, Energy, Business travel, Paper)	35
GRI Index	39
General information	
Assurance report	43
Disclaimer	44

Our strategy on corporate responsibility

As an international financial services company with 120,000 employees and over 60 million customers globally, ING has an impact on society and the environment both directly through our operations and indirectly through the provision of financial services and the purchase of goods and services. For this reason, ING wants to pursue profit on the basis of sound business ethics and respect for its key stakeholders.

For ING, corporate responsibility is a fundamental part of our strategy: ethical, social and environmental factors play an integral role in our business decisions. Everything we do to improve customer satisfaction and search for shareholder return must pass the test of integrity. Integrity means not only strict compliance with external rules and regulations and our Business Principles; it is also about having the right attitude towards key stakeholders, an attitude driven by fairness and openness.

Over the past years, ING has developed a strong framework of corporate responsibility policies. These guidelines, varying from policies on controversial weapons to employee awareness programmes, will continue to be implemented into the global business operations in 2007.

As a result of the feedback received on the previous Corporate Responsibility reports from investors, analysts, NGOs, customers and employees, we have set up a set of goals for 2007 that indicate which are the focus areas for the coming year.

PROGRESS REPORT

	2006 Goals	2006 Progress	2007 Goals
General	<ul style="list-style-type: none"> ING aims to improve the structure for engaging our stakeholders in the reporting principles. 	<ul style="list-style-type: none"> Based on a reader's survey on the CR Report 2005, ING has improved the structure of the report to make it more accessible to different groups of stakeholders. ING has started to report in line with the G3. 	<ul style="list-style-type: none"> ING will continue to engage its stakeholders in its reporting process. ING will further align the Performance Report with G3.
Our business	<ul style="list-style-type: none"> ING will continue active participation in the Equator Principles Banks network. ING will develop and introduce sector policies for wholesale banking and engage stakeholders in environmental and social policy development. 	<ul style="list-style-type: none"> ING has adopted the revised Equator Principles ING has completed the initial implementation of several approved Sector Policies. 	<ul style="list-style-type: none"> ING will train approximately 80% of its teams involved in transactions and/or engagements that are subject to the Equator Principles and/or ING's Environmental Social Risk Policies on environmental and social issues. ING will fully implement the Sector Policies. Several business units will develop products with a positive environmental or social impact.
Social performance – Labour conditions		<ul style="list-style-type: none"> We have further incorporated corporate responsibility as part of our leadership development curriculum and in general staff education programmes. Employee engagement questions have become an indispensable part of the Performance Scan, which is conducted yearly across every business line and region. The percentage of women in the Management Council has increased from 6.4% in 2005 to 7.3% in 2006. 	<ul style="list-style-type: none"> We will develop and implement a global environmental awareness programme for employees, including training on corporate responsibility issues. ING will continue to adjust its focus from measuring 'employee satisfaction' towards measuring and encouraging employee engagement.

PROGRESS REPORT

	2006 Goals	2006 Progress	2007 Goals
Social performance – Human Rights	<ul style="list-style-type: none"> • ING will review wholesale banking's compliance with the human rights policy. 	<ul style="list-style-type: none"> • ING has integrated human rights in the new Sector Environmental and Social Risk Policies. Amnesty International played a constructive role in the process as stakeholder. • ING has adopted a Human Rights Statement for its employees. • ING has committed to the principles of the UN Global Compact. 	<ul style="list-style-type: none"> • ING will train approximately 80% of teams involved in transactions and/or engagements that are subject to ING's Environmental and Social Risk Policies on subjects including human rights.
Social performance – Society	<ul style="list-style-type: none"> • ING Chances for Children aims to provide 35,000 children in developing countries with access to primary education. • ING will contribute to microfinance by making available technical expertise. • ING will establish new volunteer projects and align existing projects with a focus on primary education. 	<ul style="list-style-type: none"> • ING Chances for Children has provided 52,000 children in developing countries with access to primary school for one year. • ING employees undertook 103,000 hours of voluntary work. • ING made 24 advisors available to provide technical assistance to Microfinance Institutions for a period of four to eight weeks. 	<ul style="list-style-type: none"> • ING Chances for Children aims to provide 115,000 children in developing countries with access to primary education for one year. • ING will establish a global volunteering programme for employees. • ING aims to make 30 advisors available for technical support.
Social performance – Customers	<ul style="list-style-type: none"> • ING will continue with its customer centric approach. 	<ul style="list-style-type: none"> • 81% of the business units have measured customer satisfaction at least once a year. • ING has launched a number of initiatives, especially in mature markets, to improve customer centricity (see Annual Review 2006). 	<ul style="list-style-type: none"> • ING continues to monitor customer satisfaction and remains focused on a customer-centric approach.
Environmental performance	<ul style="list-style-type: none"> • ING will reduce or compensate for the impact of energy consumption, business travel and paper consumption. 	<ul style="list-style-type: none"> • ING reduced its carbon footprint by 26% compared to 2005. • 17.4% of ING's electricity came from renewable sources. • 44% of the electricity purchased by ING in the Netherlands came from renewable sources. • 100% of the emissions caused by business travel are compensated. • Several business units have implemented programmes to reduce the paper usage. 	<ul style="list-style-type: none"> • ING aims to be carbon neutral in 2007. • ING will launch an environmental awareness programme for employees to further reduce its direct impact on the environment. • 100% of the electricity purchased by ING in the Netherlands comes from renewable sources. • In the Netherlands ING will sign a covenant with FSC (Forest Stewardship Council) to purchase environmentally friendly paper only.

Organisational profile

ING provides a broad range of insurance, banking and asset management services and is a top-15 global financial institution (based on market capitalisation). We serve more than 60 million customers in Europe, the United States, Canada, Latin America, Asia and Australia. We draw on our experience and expertise, our commitment to excellent service, and our global scale to meet the needs of a broad customer base, which includes individuals, small businesses, large corporations, institutions and governments.

ING is the number one financial services company in our Benelux home market where we provide our clients with a wide range of retail-banking, insurance and asset management services. Our wholesale banking activities operate world-wide but with a primary focus on the Benelux countries. In the United States, ING is a top-5 provider of retirement services and life insurance. In Canada, we are the top property and casualty insurer. ING Direct is a leading direct bank with over 17.5 million customers in nine large countries. In the growth markets of Asia, Central Europe and South America we provide life insurance, among other things. ING is also a large asset manager with assets under management of around EUR 600 billion. (GRI 2.1-2.10)



More detailed information on our organisational profile, including our products, our services, our organisational and legal structure and our brands can be found at www.ing.com under About Us and in our Annual Report 2006. For more information on the major decisions ING took in 2006, please visit www.ing.com under Press Room.

Country list

The following business units and divisions, together 96% of all ING FTEs, are included in this CR Report:

Europe	America	Asia/Pacific
Belgium <ul style="list-style-type: none"> • ING Bank • ING Insurance • ING Investment Management • ING Technics • Record Group 	Brazil <ul style="list-style-type: none"> • ING Bank 	Australia <ul style="list-style-type: none"> • ING Direct • ING Australia • ING Investment Management • ING Real Estate
Bulgaria <ul style="list-style-type: none"> • ING Bank • ING Pension Insurance 	Canada <ul style="list-style-type: none"> • ING Direct • ING Canada 	China <ul style="list-style-type: none"> • ING Capital Life Insurance • Pacific-Antai Life Insurance
Czech Republic <ul style="list-style-type: none"> • ING Bank • ING Insurance • ING Penzijni Fond 	Chile <ul style="list-style-type: none"> • ING AFP Santa Maria • ING Seguros de Vida • ING Salud Isapre 	Hong Kong <ul style="list-style-type: none"> • ING Bank • ING Insurance
France <ul style="list-style-type: none"> • ING Bank • ING Direct 	Mexico <ul style="list-style-type: none"> • ING Bank • ING Commercial Americai • ING Afore 	India <ul style="list-style-type: none"> • ING Vysya Bank • ING Vysya Life
Germany <ul style="list-style-type: none"> • ING Bank • ING DiBa (ING Direct) 	Peru <ul style="list-style-type: none"> • ING AFP Integra • ING Fondos 	Japan <ul style="list-style-type: none"> • ING Life Insurance
Greece <ul style="list-style-type: none"> • ING Insurance 	USA <ul style="list-style-type: none"> • ING Bank • ING Clarion • ING Direct • ING Financial Services 	Malaysia <ul style="list-style-type: none"> • ING Insurance Berhad
Hungary <ul style="list-style-type: none"> • ING Bank • ING Insurance 		New Zealand <ul style="list-style-type: none"> • ING New Zealand
Italy <ul style="list-style-type: none"> • ING Bank • ING Direct 		Philippines <ul style="list-style-type: none"> • ING Bank
Luxembourg <ul style="list-style-type: none"> • ING Luxembourg 		Singapore <ul style="list-style-type: none"> • ING Bank
The Netherlands <ul style="list-style-type: none"> • Bank Mendes Gans • ING Bank • ING Car Lease • ING Investment Management • ING Real Estate • ING Trust • Nationale-Nederlanden • Postbank • Postbank Verzekeren • RVS 		South Korea <ul style="list-style-type: none"> • KB Life
Poland <ul style="list-style-type: none"> • ING Bank Slaski • ING Nationale-Nederlanden 		Taiwan <ul style="list-style-type: none"> • Antai Life
Romania <ul style="list-style-type: none"> • ING Asigurari de Viata • ING Bank 		Thailand <ul style="list-style-type: none"> • ING Life
Russia <ul style="list-style-type: none"> • ING Bank 		
Slovakia <ul style="list-style-type: none"> • ING Bank • ING Zivoyna Poistovna 		
Spain <ul style="list-style-type: none"> • ING Bank • ING Direct • ING Nationale-Nederlanden • ING Real Estate 		
Switzerland <ul style="list-style-type: none"> • ING Bank 		
Ukraine <ul style="list-style-type: none"> • ING Bank 		
United Kingdom <ul style="list-style-type: none"> • ING Bank • ING Direct • ING Real Estate 		

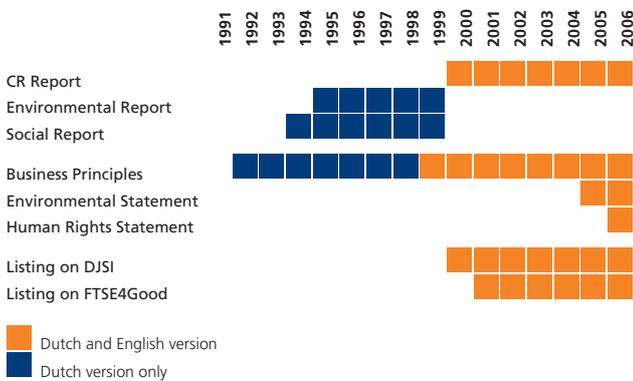
Our approach to reporting

This year we are publishing two separate documents that together form ING's Corporate Responsibility Report 2006. 'The Big Picture' highlights the Corporate Responsibility (CR) topics that were most important to our stakeholders and our businesses in 2006. The 'Performance Report 2006' covers ING's performance in the field of CR in more detail. (GRI 3.1)



ING has published a CR Report on an annual basis since 2000. For previous reports please visit www.ing.com under Publications. (GRI 3.2, 3.3)

HISTORY OF CR REPORTING



Content (GRI 3.5)

We have determined the content of the Big Picture Report and the Performance Report 2006 based on the following factors (the Materiality Check):

- Consultation with our business lines to identify the CR topics most relevant to our business operations.
- Reader Survey on our CR report 2005.
- Concerns expressed by our stakeholders (for a definition of our stakeholders see pages 10 and 11 of this report).
- Broader social expectations.
- Reasonably estimated sustainability impacts, risks or opportunities as identified by ING Group's function
- ING's influence on customers and suppliers.
- Expectations expressed in international standards.

The rationale behind the two reports

A reader's survey on our CR Report 2005 showed that it is in general read by two different groups of readers. The first consists mainly of (potential) employees and customers. This group reads the CR Report to get a general idea about ING's strategy and focus areas in the field of CR. The second group of readers includes SRI analysts and other CR specialists. They expect a more detailed overview of strategy, performance and targets, preferably based on G3. To accommodate both groups of readers we publish our CR Report in two parts:

1. The Big Picture Report is designed to provide a short overview of the most material issues. It outlines how we have incorporated CR into our business operations. For each of our key activities – insurance, banking and asset management – we describe our CR strategy and identify the most material topics. The Big Picture also sets out our Group strategy relating to our employees, community development, arts & culture and environmental care.
2. The Performance Report is a web-based report that provides detailed information on our performance relating to our CR policies. The Performance Report follows the framework of version 3.0 of the Sustainability Reporting Guidelines of the Global Reporting Initiative (G3).

Collecting the data (GRI 3.9)

We used an integrated Corporate Responsibility Tool (CR tool) to gather information for this report. This CR Tool was first implemented in 2005 and is used to gather, track, validate and communicate information on CR. Every year all business units with over 100 FTEs (Full Time Equivalent, the total numbers of employees, including part-time employees, converted into employees that work a full-time working week) submit data signed off by a senior executive of the business unit via the CR Tool. This data is monitored by both ING and an independent consultant (DHV) using analytical procedures and follow-up inquiries to the business units.

Our approach to reporting continued

For the performance indicators not covered by the CR Tool, we gathered information at different levels within the organisation. ING Group Compliance, Credit Risk Management, Operational Risk Management, Corporate Procurement and Human Resources provided performance data and descriptions of corporate policies, procedures and monitoring systems, all with global coverage.

Where available, financial information is based on the consolidated figures of the Annual Report 2006.

There were no significant changes to the measurement methods applied to key economic, environmental or social data. Although we are confident of the overall reliability of the data reported, we recognise that some data is subject to a degree of uncertainty due to unavoidable limitations in the measuring, calculating and estimating methods used.

Boundaries (GRI 3.6, 3.7 and 3.8)

The data in this report covers ING's subsidiaries in 36 countries and includes 96% of total FTEs of ING. For each table or graph in this report we state the specific coverage in FTEs. This report covers two ING subsidiaries that were not covered in the CR Report 2005, namely ING Lease Netherlands (360 FTEs) and Postbank Verzekeren (250 FTEs). These changes have a minimal impact on the coverage of this report, as the respective entities together represent only 0.5% of the employees of ING.

The coverage in relation to the environmental performance indicators (pages 35 to 38 of this report) has been strongly improved compared to the coverage in 2005.

We have valued the joint ventures covered in this report as if they are ING subsidiaries.

This Performance Report contains links to information on the ING website and to external websites. The information in these links, except for the link to the chairman statement, does not form part of the Performance Report.

Consistency in Reporting (GRI 3.10)

The restructuring of the report into two separate documents has not significantly affected the consistency of reporting. The Performance Report is designed to enable our readers to make a comparison with ING's performance over previous years. Where the data over previous years were not available or where the coverage changed significantly over the last years, we only report 2006 figures.

Restatement

We restate our energy usage in gig joules as reported in the ING CR Report 2005. The figures in the CR Report 2005 were based on a miscalculation. The reported energy consumption in standard measures in the CR Report 2005 is correct.

Global Reporting Initiative (GRI 3.12)

The Global Reporting Initiative (GRI) has developed sustainability reporting guidelines that aim to increase the transparency and accountability of economic, environmental, and social performance. For more general information on GRI, please visit www.globalreporting.org.

ING supports the GRI and reports in accordance with version 3.0 of the Sustainability Reporting Guidelines of the Global Reporting Initiative: G3. If G3 indicators are not applicable or relevant to ING based on our Materiality Check (see page 6 above), we explain why we do not report on them. In relation to certain (new) indicators there is currently not sufficient information available and we aim to make these indicators part of future reporting. Pages 39 to 42 of this Performance Report 2006 contains a GRI Index that links the GRI indicators to related information in this report, or other ING Publications. We include the GRI Indicators and Financial Sector Supplement (Social Performance) in brackets after the relevant information.

Assurance (GRI 3.13, CSR 3)

The audit firm Ernst & Young has reviewed the accuracy and adequacy of the information in this report 2006. The assurance report can be found on page 43.

Any definitions or criteria used in this Performance Report will be explained throughout the report. (GRI 2.18)



More information (GRI 3.4)

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Governance and Compliance



For more information on Governance and Compliance please visit www.ing.com/cg and pages 18 to 19 of the Annual Report

Governance structure of the organisation (GRI 4.1, 4.2, 4.6, 4.7, 4.9, 4.10, CSR 4)

ING has a two-tier board structure consisting of the Executive Board and Supervisory Board. In ING's view, a two-tier board is the best way to create the proper checks and balances within the company.

The Executive Board is responsible for the day-to-day management of the company and its business lines. The Supervisory Board is responsible for monitoring management performance and advising the Executive Board. The Supervisory Board is made up exclusively of outside directors.

Details on the organisation, powers, modus operandi, the qualifications and expertise of the Executive Board and Supervisory Board can be found at our website www.ing.com/cg. Details of the remuneration, ancillary positions and policies relating to conflicting interests of members of the Executive Board and Supervisory Board are provided in the Annual Report 2006.

Group Corporate Responsibility Function (GRI 4.1, 4.9, CSR 2)

The Corporate Responsibility team (CR Team) falls under the responsibility of the Chief Executive Officer. The role of the team is to engage in dialogue with civil society groups and other stakeholders, develop strategy and policies on CR-related issues, monitor good practices and flag up potential trends and emerging issues. The team further coordinates information gathering and performance reporting, including producing the annual CR Report. The CR team is also responsible for benchmarking, completing of global surveys and participating in thought leadership forums.

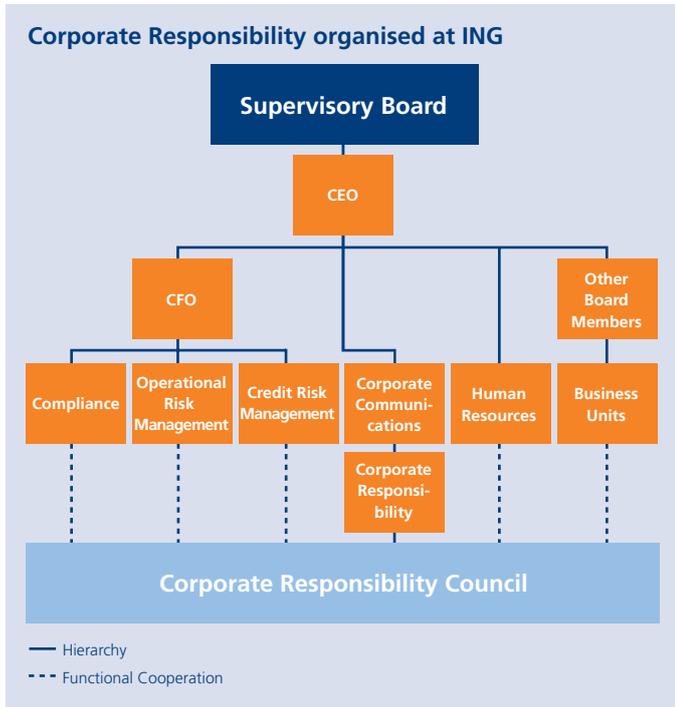
The CR team develops ING's CR strategy which applies to all business units world-wide. Business units develop their own additional policies and follow their own specific focus points in policy achievement and strategy. It is the responsibility of each business unit to adhere to the policies set at Group level. The CR team monitors and measures the CR performance of each business unit on a yearly basis with its integrated CR Tool (see 'Our Approach to Reporting', pages 6 and 7 above).

In addition to the Group CR team, various departments work in specific areas to ensure that policy commitments are met. These departments include:

- ING Group Human Resources
- Diversity Council
- Corporate Compliance
- Operational Risk Management
- Corporate Credit Risk Management
- Community Development

These departments co-ordinate Group-wide initiatives and provide policy recommendations to the Executive Board, various committees, and the Group Corporate Responsibility function.

Governance and Compliance continued



Financial Economic Crime

IN 2006, ING revised its Financial Economic Crime (FEC) Policy to comply with the third EU Anti-Money Laundering Directive. This has improved Customer Due Diligence and Know Your Customer procedures. ING also launched a FEC Program to implement the revised policy. This programme is managed at Group level and consists of reviewing all customer files and implementing screening and monitoring software in all businesses. Reviewing customer records helps prevent ING and its systems from being used to launder money or finance terrorist activities.

Increasing Awareness

ING has undertaken some major initiatives to increase compliance awareness, which is critical to avoid incidents. Examples of such initiatives are the compliance e-learning course that all Dutch employees had to complete in 2006 and the United States Financial Services Compliance Awareness Week. In addition, the General Code of Conduct (applicable to all Netherlands-based employees) was renewed and all employees in the Netherlands received a booklet of the text. Finally, ING Matters – the magazine for all ING employees – contained several articles highlighting compliance dilemmas, while polls were posted on the corporate intranet portal.

Code of Conduct (GRI 4.8)

The ING Business Principles serve as the main ethical compass for our business activities and guide us in managing our duties towards others. They describe our commitments towards each stakeholder and create a single standard of ethical behaviour for everyone at ING.

The Business Principles were first drawn up in 1999 and were updated in 2004 to reflect regulatory requirements and the changing business environment. We have added a business principle explicitly endorsing the Universal Declaration of Human Rights. In 2006, ING developed a human rights statement covering all employees. For the full text of our Business Principles and Human Rights Statement please visit www.ing.com/cr under Principles and Policies.

The Compliance Organisation

ING's compliance organisation and structure is described in the ING Group Compliance Policy. In 2006, ING has further implemented the requirements of the ING Group Compliance Policy. The implementation has been a key performance target for all senior managers.

ING has strengthened its compliance organisation by allocating approximately an extra 130 FTE to Compliance, increasing the number of dedicated compliance FTE from 560 to 688. Another 95 FTEs have compliance-related responsibilities, such as monitoring.



For more information on compliance please visit [our website](http://www.ing.com/cg)

www.ing.com/cg under Compliance

Stakeholder engagement (CSR 6)

Dialogue with all stakeholders is an integral part of ING's commitment to corporate responsibility. We believe that earning the trust of each stakeholder group supports us in achieving the strategic objectives of our company. Satisfied customers and shareholders, motivated employees and good relations with business partners and local communities are all fundamental to ING's long-term success. Our commitment to society is reflected in our relationship with Non Governmental Organisations (NGOs) and international organisations, and in ING's sponsoring, volunteering and corporate charity activities around the world.

Engaging shareholders

Type of engagement	Target group	2006	2005	2004
Annual General Meeting	Private & institutional shareholders	1	1	1
Meeting with raters	Crediting rating agencies	8	6	6
Meetings on results	Analysts	6	6	6
Investor Relations symposia	Analysts	2	3	2
Conference calls	Analysts	5	5	5
Roadshows	Investors	33	31	17
Conferences	Investors, analysts	11	10	13
One-on-one meetings	Investors, analysts	340	330	184
Group meetings	Investors, analysts	58	46	42
Total		464	438	276

How we engage

Stakeholder engagement takes many forms, both formal and informal. It ranges from large studies among our customers on our brand values to meetings with employee representatives and one-on-one meetings with shareholders or NGOs. Part of our engagement is to be a member of or establish partnerships with a range of international organisations. To be able to balance the interests of all our stakeholders we are dedicated to engaging in regular dialogue with each stakeholder group.

We keep a record of what we learn from our stakeholders, based on which we prioritise issues and take action where necessary.

Our stakeholders

Customers

ING manages the finances of 60 million clients: individuals, companies, institutions and governments. Potential customers and consumer representative groups are also stakeholders. Key topics for customers are customer satisfaction, customer privacy and responsible marketing. More information on these topics can be found on pages 33 and 34 of this report.

Shareholders

ING has a large number of international investors, both private and institutional. The majority of shares are held by institutional investors and pension funds. This stakeholder group also includes analysts, rating agencies and the socially-responsible investment (SRI) community. Key topics for shareholders are value creation, profit growth, corporate governance and transparency. The SRI community shows most interest in our policies regarding human resources, climate change and compliance.

Almost all of ING's ordinary and preference shares are held by the ING Trust Office. Investors are given bearer depositary receipts which give them, after having been granted a proxy by the ING Trust Office, an identical position as shareholders with regard to voting. The ING Trust Office votes on behalf of bearer depositary receipt holders who are not present or represented at the General Meeting of Shareholders (GMS).

It is the intention of the Executive Board and the Supervisory Board to abolish the Trust Office and the depositary receipts once the numbers of votes on ordinary shares and the depositary receipts of ordinary shares, including proxies, at a GMS is at least 35% of the total votes that may be cast for three consecutive years. In 2005, 26% of total votes were cast, which figure increased to 28% in 2006. The Executive Board is committed to achieving the 35% requirement and will encourage depositary receipt holders, particularly institutional investors, to participate in the voting at the GMS.

Stakeholder engagement (CSR 6) continued

It has always been a priority for ING to have good communications with shareholders. The ING Investor Relations department is in constant dialogue with investors, analysts and rating agencies, arranging meetings with Investor Relations staff and Executive Board members.

Employees

Current, former and future employees, the different regional and local works councils, labour unions and networks representing our employees' interests are all considered stakeholders. Key topics for our employees are outsourcing, environmental care, diversity and community development. In our experience, corporate responsibility contributes to company pride. More information on employees can be found on pages 22 to 28 of this report.

Business Partners (SUP2)

For its business relations, ING wants to be a reliable counterpart. We want to ensure that our cooperation with them, and the activities that originate from any cooperation, do not conflict with our values or ethical standards as stated in our Business Principles. Key topics for suppliers are prompt payment, prices and fair treatment.

Society at large

Society consists of numerous sub-stakeholders that represent different interests. This includes national and international governmental bodies, Non-Governmental Organisations (NGOs), non-profit organisations, CR opinion leaders and local communities. Most questions we received related to projects that ING finances or invests in. Other key issues are climate change and human rights.

Commitment to external initiatives

ING is an active participant in many organisations and has signed up to numerous initiatives world-wide.

ING has endorsed:

- Universal Declaration of Human Rights
- Equator Principles
- Carbon Disclosure Project
- Global Reporting Initiatives
- Core conventions of the International Labour Organisation

ING is member of or participant in:

- United Nations Global Compact
- Global Round Table on Climate Change
- Amnesty Round Table on Human Rights
- European Academy of Business in Society
- European Financial Services Round Table
- Netherlands Financial Sector Development Exchange



A full list of our most significant principles and memberships can be found at www.ing.com/cr under International Network

Our response to stakeholders

We listen carefully to the input from all our stakeholders and take action where necessary or desirable. Initiatives resulting from our stakeholder dialogue with stakeholders in 2006 include, for example, divestment from several companies involved in the production of controversial weapons, the adoption of a new Human Rights Statement for our employees and our participation in the UN Global Compact.

Stakeholder engagement (CSR 6) continued

In general, stakeholders indicated it is important to them how we embed our CR policies into our daily business operations. In 2006, we received several questions and remarks on how we do business:

1. “Banks should avoid any financial or moral support to one of the most oppressive regimes in the world (Burma). (...) urge the banks (...) to stop any financial support to companies which refuse to withdraw.”

In 1997, ING closed its Representative Office in Burma. Since then we are no longer present in the country, and we do not conduct business or finance projects in Burma.

Recently, we were asked to broaden the scope of this policy and to stop financing of and investing in all international multinational companies that do business in Burma, including all global activities of these companies. After thorough consideration, ING deemed this not feasible. In the international business environment, there are hundreds of companies with some form of relationship with Burma, including large international conglomerates. ING is not able to exclude such an extensive group of companies from its world-wide business portfolio.

2. “We hope that ING Bank decides not to finance the supply of corvettes to Indonesia.”

ING was asked not to finance the supply of corvettes to Indonesia. Pressure groups fear these vessels might be used for operations involved in human rights violations. The vessels will be built and used for coast guard services and to fight drug trafficking, illegal fishery and piracy. The supply of the corvettes was discussed in the Dutch parliament in 2004. A majority in Parliament members supported the supply. In June 2006, the Dutch government informed the Parliament about economic, security and human rights issues in Indonesia, and after careful consideration issued an export licence in October 2006. Given the purpose of the vessels and the due caution the Dutch government exercised when issuing the export licences, ING decided to finance the supply of the corvettes.

3. “How do you apply international labour rights standards?”

The ING Business Principles state that we support the aims of the United Nations Universal Declaration of Human Rights (UDHR). NGOs and Social Responsible Investors asked ING to explain its position in more detail with regard to labour rights for its own employees. In response, we drafted and implemented an ING Human Rights Statement. Based on the International Labour Organisation Core Conventions, this statement describes minimum labour rights standards regarding non-discrimination, child labour, forced labour and the freedom of association for our employees world-wide.

4. “Is ING involved in financing the modernisation of (...) a factory that produces white phosphor?”

ING applies strict criteria regarding companies directly involved in controversial weapons such as anti-personnel landmines, cluster bombs, depleted uranium ammunition and biological, chemical or nuclear weapons. This specific question refers to an investment made in companies that supply a factory that produces white phosphor. The investments were made on behalf of our customers. ING does not own the shares and is not in the position to decide to either hold or sell the shares. We will not invest our proprietary assets in weapons-oriented companies directly involved in controversial weapons. For customers who wish to exclude defence industry securities from their portfolio, we offer sustainable investment funds and portfolio screening.

5. “Does sponsoring Formula One racing conflict with ING’s environmental policy?”

We fully understand the concerns some people have about the potential harm to the environment from the CO₂ emissions related to Formula One. The F1 sponsorship is above all a marketing decision, designed to expand our brand reach internationally. However, we have carefully looked at the CR issues of F1. F1 is taking action to become more environmentally friendly through a series of technical improvements and innovations to the cars via technical regulations operative from 2009-2011. These regulations will have a significant impact in reducing the environmental impact of the sport, including the use of bio-fuels in F1 cars from 2008. The global sanctioning body responsible for international motor racing (FIA) has been offsetting all the emissions caused by F1 races since 1997. If there are any leftover emissions of the ‘ING Renault F1 team’ not covered by the FIA programme, ING intends to expand our existing compensation programme. ING supports the planting and rehabilitation of degraded tropical rainforest in Malaysia to offset our global emissions. Combined with efforts made to enforce energy efficiency and purchase green electricity, this programme is expected to reduce and/or offset all ING Group carbon emissions by 100% in 2007.



For more detailed information on some of these questions please visit our website www.ing.com/cr under Dilemmas

Insurance (INS1-INS4)

We have the biggest impact on society through our business. Stakeholders pointed out the importance of having CR considerations embedded in our business operations. This chapter gives an overview of the most material topics in each of our core business operations: Insurance, Banking (retail and wholesale) and Asset Management.

Millions of people around the world lack appropriate insurance. This may create problems for individuals and weakens the fabric of society. By offering insurance products, especially in emerging markets, ING follows a strategy that will benefit local economies for decades to come. Ageing populations, meanwhile, are another long-term challenge that ING seeks to meet. By providing retirement services, we enable our clients to make adequate provisions for the future and we help governments to build sustainable pension systems. ING offers non-life insurance, life insurance and pension services. More information on our insurance activities is included in our Annual Report 2006.

Accessibility and Micro Insurance (INS1 and 4)

By expanding our insurance activities to new markets, ING offers more and more people a means to secure their future. Life insurance in emerging markets, like Central Europe, Latin America and Asia/ Pacific, is one of ING's key focus areas.

Prudent risk management is essential in managing an insurance portfolio. Our responsibilities include compliance with all regulations and fulfilling our promises to policyholders and shareholders. Sometimes, however, ING accepts higher-risk customers as part of our wider social responsibilities.

For example, ING Vysya Life in India offers micro-insurance products for the rural community (farmers, self-employed people, and contract and day labourers). In 2006, some 56,000 people were insured for a collective sum of EUR 9.6 million collectively. The premium collected was EUR 18,600. ING Vysya Live anticipates an additional 65,000 people will be insured by March 2007, bringing it to a total of 125,000 people insured, five times the social sector responsibility as stipulated by the Indian regulator. Furthermore, ING Group and Planet Finance India have joined forces to set up the Micro Insurance Awards 2007. This award will build a comprehensive inventory to help identify best practices in micro insurance, product design and distribution channels.

Responsible Marketing and Customer Satisfaction (INS1-3)

In addition to introducing new and affordable insurance products, ING works to make these products transparent and to educate people on how to best use them. Responsible marketing and customer satisfaction are important issues for ING, particularly within our insurance operations. For information on responsible marketing and customer satisfaction please see pages 33 and 34 of this report.

Ageing populations (INS4)

Ageing populations are becoming more and more of a burden on government pension systems. The pay-as-you-go pension systems that exist in many countries cannot service the growing need under the changing demographic circumstances. As a result, governments can no longer bear the costs of sustaining their pension systems alone. Employers and employees as well as all individual citizens have to assume part of the responsibility of funding retirement. As a leading international provider of retirement services, ING is fully aware of its social responsibility to contribute to sustainable retirement solutions. ING advises governments in several countries on pension reform and helps governments to build second and third pillar pension systems. ING fosters partnerships with private and public institutions to increase international pension know-how through research and to create awareness among the public to make adequate old age provisions. Furthermore, ING seeks co-operation with industry organisations, actuary firms, brokers and peer companies to share expertise and promote initiatives that increase private pension provisions.

Banking (RB1-RB3, IB1-IB3)

Banks are pillars of society. By financing business ventures and individuals, they promote social and economic advancement. ING wants to lend responsibly and has adopted policies that complement financial criteria with social, ethical and environmental ones. Our main banking activities comprise retail banking and wholesale banking activities. More information on our banking activities is included in our Annual Report 2006.

ING Retail Banking (RB1-RB3)

ING Retail conducts banking activities in the Netherlands, Belgium, Poland, Romania and India. The retail banking operation also offers private banking services in selected markets, such as the Netherlands, Belgium, Switzerland, Luxembourg and several countries in Asia.

Financial Literacy

By teaching the basics of financial literacy, our banking operations are committed to enhancing the opportunity for people to build a more secure financial future. Several ING business units offer tools to help children learn more about financial planning and products.

For example, ING Direct, one of the world's largest direct banks, has developed Planet Orange (www.orangekids.com) to help American children become more financially literate. Animated characters Cedric and Amy teach kids about earning, spending, saving and investing money, while teachers can use the site's resources to integrate financial literacy in their curriculum.

Postbank in The Netherlands offers an interactive savings product specially designed for children ages 7 to 11. It includes a high-tech piggy bank and educational software that was developed in conjunction with NIBUD (the Dutch national institute for budget education), educational specialists and parents to help children learn about handling money. For more information on the Blue Box visit www.postbank.nl.

Customer Satisfaction

Improving customer satisfaction is an important part of the ING Retail Banking strategy. This is reflected in a series of measures over the coming years:

- More systematic measuring of customer satisfaction.
- Making customer satisfaction targets part of the individual performance report.
- Extra focus on complaint management and solving client problems.
- Installing product approval processes (including compliance and risk management) that guarantee careful information to the client.
- Simplifying products and processes through value chain management

For data on customer satisfaction and product responsibility please see page 33 and 34 of this report.

Banking continued

Wholesale Banking (IB1-IB3)

ING has wholesale banking activities in over 40 countries with a strong base in Europe, particularly in the Benelux.

Environmental and Social Risk Policies (IB1, EN26, EN27, HR1)

For credit lending and project financing ING has acknowledged the importance of social, ethical and environmental risk criteria since 2003. ING has internal guidelines for lending products (such as corporate loans, export financing and commodity financing) designed to mitigate such risks in its loan portfolio (the Environmental and Social Risk Policies or ESR policies).

Progress made in 2006

- ING has adopted the revised Equator Principles
- ING has completed the initial implementation of the approved Sector Policies for:
 - Forestry & Plantations (pulp and paper mills, oil palm, soy, rubber, cotton, banana, tea, coffee, cacao, and trade of plantation products)
 - Manufacturing & Agriculture with a labour right focus (including tea, coffee, cocoa, cotton, textiles, clothing and apparel, furniture and toys)
 - Natural Resources & Chemicals (including Oil & Gas, Metals & Mining)
- The existing policy on financing palm oil plantations has been updated and is now incorporated in the Forestry Policy

Goals for 2007:

- ING will fully implement the Sector Policies
- ING will train approximately 80% of employees involved in transactions subject to ING's ESR Policies on the revised Equator Principles

Equator Principles

The Equator Principles form a prominent part of the ESR Policies. The Equator Principles have become a standard for the financial industry to manage environmental and social risk in project financing. Introduced in June 2003 and adopted by 45 banks and other financial institutions, the Principles have been a huge step forward for the project finance industry. In 2006 Equator Principles Financial Institutions (EPFI) adopted a revised set of Equator Principles reflecting experiences gained from applying Equator Principles for the past three years and the new International Finance Corporation's (IFC) Performance Standards. ING has played an important role in the revision process by managing and updating the EPFI website, engaging clients, SRI analysts, civil society groups and official development agencies, all of whom provided constructive and valuable feedback. The Equator Principles secretariat, which was the responsibility of ING in 2005, has been transferred to Mizuho (in Japan).



For more information on the Equator Principles please visit www.equator-principles.com



Banking continued

Governance

The ESR Policies and the accompanying risk filters have to be applied to all engagements within Wholesale Banking. ING has created internal checks to monitor that the ESR Policies are applied in the right way.

Primary responsibility for sustainability risk lies with the Front Office (being the first point of contact), in its dialogue with the clients. Risk Management then provides a 'control' function so that the ESR policies are applied correctly and consistently. For transactions and client engagements with significantly high sustainability risks, involvement of risk management and engagement of the specialists of the Environmental and Social Risk Team (the ESR Team) becomes mandatory. Engagement of this specialist team allows Front Office to either filter out undesirable transactions at a very

early stage or help influence improvements in the sustainability risk profiles of the clients and the underlying projects.

If a transaction or engagement is in breach of the ESR policies or carries a negative advice from the ESR Team, it can only be considered for approval by the Group Credit Committee (the highest approval authority) or the Executive Board. However, these transactions are considered exceptions and need to be fully documented and motivated.

In 2006, a number of the transactions were submitted for advice from the ESR Team based on the application of the ESR Policies. 25 transactions were declined based on General and Sector ESR Policies and 6 transactions were declined based on the Equator Principles.

EQUATOR PRINCIPLES

Sector and Region	Total	Category			EP Spirit ²	Conditions ¹		Role	
		A	B	C		advice	approved	declined	MLA ³
Industrial Sectors	2	1	1			2			1
Power & Utilities	3		2	1	2	1	2		3
Natural Resources	7	1	6		3	3	2	2	1
Americas total	12	2	9	1	5	6	4	2	5
Industrial Sectors	1	1				1			
Power & Utilities	5		5		3		5		3
Natural Resources	5	3	2		1	3	1	1	4
Asia total	11	4	7		4	4	6	1	7
Industrial Sectors	6	1	5		1	4	2		3
Power & Utilities	2		2			1	1		1
Natural Resources	3	2	1			2		1	1
Eastern Europe total	11	3	8		1	7	3	1	5
Industrial Sectors	1		1			1			1
Power & Utilities	1		1			1			1
Natural Resources	5		5		3	2	3		1
Middle East total	7		7		3	4	3		3
Industrial Sectors									
Power & Utilities	1		1		1		1		1
Natural Resources	3	1	2		1		1	2	1
Infrastructure	1		1		1		1		1
Africa total	5	1	4		3		3	2	3
ING Total	46	10	35	1	16	21	19	6	23

¹ Additional conditions set to comply with the EP

² EP Spirit projects do not meet the strict definition project finance

³ Mandated Lead Arranger

Banking continued

Micro Credit and Sustainable Products (IB3)

ING offers several banking products that provide environmental and social benefits on top of the standard financial benefits. These products allow business units to meet the demand for sustainable solutions.

Microcredit

The ING Green Finance department is responsible for issuing loans to microfinance institutions in developing countries in Latin America, Central and Eastern Europe and Asia. For the past two years, ING Green Finance has gained extensive experience in, for example, the specific risks inherent in the various developing countries.

In India, ING Green Finance works closely with ING Vysya Bank. ING Vysya Bank, provides wholesale loans to Microfinance Institutions (MFIs) and retail microfinance loans to individual customers in India. The total value of the wholesale loans outstanding at the end of 2006 was USD 17.9 million with approximately 264,000 clients reached. In 2006, ING Vysya Bank supplied small retail loans of less than USD 12,500 to nearly 6,000 clients through Self Help Groups (SHGs) and to nearly 18,000 individual customers. The bank has USD 5.8 million outstanding through SHGs and to individuals.



For more information on Microfinance please visit the website of ING Microfinance Support www.ingmicrofinance.com

Other Sustainable Products

ING Bank Netherlands aims to raise corporate responsibility awareness among its clients. Therefore, it introduced the 'Care & Profit Prize'. This prize is awarded every two years to a Dutch company which is successful in doing business in a sustainable way. In 2006, the prize was awarded to Paques B.V., a supplier of industrial installations for the purification of waste water.



For more information on the Care & Profit Prize please visit www.careprofit.nl

Since 2006, ING Car Lease, which operates 300,000 vehicles in Europe, offers its Dutch customers the opportunity to lease energy efficient cars. ING Car Lease can restrict the type of cars on offer to those that have received A, B or C class labels, which indicate higher levels of energy efficiency. About 70% of passenger cars leased in the Netherlands by ING Car Lease in 2006 had one of these three labels.



For more information on ING Car Lease please visit www.ingcarlease.nl

PROJECTS POSTBANK GREEN
ACCORDING TO TYPE
in percentages

District heating	22
Green-label greenhouses	18
Sustainable energy	14
Sustainable construction	13
Nature	13
International	2
Organic agriculture	2
Innovative projects	16



ING Bank and Postbank in the Netherlands offer clients the opportunity to invest in projects that have received a green certificate within a government-sponsored scheme. The scheme includes sustainable energy projects such as sustainable housing, green label greenhouses and wind and solar energy. ING Green Finance is responsible for arranging the financing of projects under the scheme. Postbank Groen, ING's subsidiary operating under the scheme, had a total portfolio of EUR 833 million at year-end 2006.

Over the years, many 'green' projects have been financed by ING Green Finance. Recent highlights include a CO₂ pipeline project that transports CO₂ emissions collected at a refinery to greenhouses nearby and the restoration of a dune landscape in the Netherlands.

The ING Green Finance also assists companies in Eastern Europe and Asia to identify and structure emission reduction projects. These projects fall under the Joint Implementation (JI) or Clean Development Mechanism (CDM) scheme. ING Green Finance helps clients to sell their CO₂ emission reductions, negotiating best prices and terms. Deals in 2006 include a waste heat utilisation project in China, a project to use coal mine methane for heat generation in Ukraine and several energy efficiency projects in Russia. The total CO₂ reduction of these three projects amounts to approximately the equivalent of about 2.2 million tonnes of CO₂.



For more information on green saving opportunities offered by Postbank please visit www.postbank.nl

ING Bank Netherlands offers its retail clients a 'green mortgage'. If a house has received a green certificate within a government-sponsored scheme, the owner can profit from a lower interest rate than if the house would not have such certificate. The scheme includes houses that fulfil certain requirements relating to the use of environmentally friendly building materials, energy and water efficiency and other environmentally friendly measures.

Asset Management (AM1-AM3)

ING has EUR 600 billion of assets under management that it invests around the globe. A substantial proportion of these assets is derived from premiums paid by consumers for ING's life insurance products. They are the main component of ING's proprietary assets. ING has an obligation to invest these funds in a responsible manner. Furthermore, ING manages third-party assets for investors, both private and institutional, who choose to invest their money through ING at their own discretion. ING Investment Management (ING IM) is the business unit that manages most of these proprietary and third-party assets.

Proprietary assets

ING holds EUR 195.5 billion in proprietary assets. We have a duty to invest these assets in a responsible manner. We want to ensure that we are able to meet our obligations to our policy holders in the future, but we also want to avoid investing proprietary assets in companies that engage in activities incompatible with our Business Principles or other ING policies, including our defence policy. (AM1) Under the latter, ING prohibits the investment of proprietary investments in companies that produce, maintain or trade controversial weapons. These include anti-personnel landmines, cluster bombs, depleted uranium ammunition and biological, chemical or nuclear weapons. In 2006, we updated our portfolio with the latest insights and we again divested from a number of companies as a result of this policy. Clients who wish to exclude defence industry securities from their investment portfolio are offered sustainable investment funds and portfolio screening.



Please visit our website for more information on ING's Business Principles and Defence Policy. <http://www.ing.com/cr> under Principles and Policies

Voting policy

ING has a global voting policy that governs how ING uses its voting rights for all of its third-party and proprietary assets world-wide. In 2006, ING further increased the use of its voting rights and expanded the reporting of its voting policy. Its voting behaviour is in accordance with local best practice for corporate governance by the International Corporate Governance Network (ICGN). To avoid potential conflicts of interest, the global voting policy makes a clear distinction between proprietary assets and third-party assets. There are separate procedures for both assets and there are mechanisms in place, under the Chinese Walls Policy, to prevent information exchange between the two. For third-party assets, ING will always vote to serve the best interest of the client. On the basis of the global voting policy, ING focuses on long-term shareholder value. However, besides financial, economic and corporate governance criteria, other stakeholder interests and social, ethical and environmental considerations are at times relevant factors in determining what constitutes long-term shareholder value. (AM3)



Please visit our website for more information on ING's global voting policy. www.ing.com/cg under Compliance

Asset management (AM1-AM3) continued

Sustainable products (AM2)

ING offers investors socially responsible investment (SRI) opportunities such as the ING IM global sustainable equity funds with a total portfolio of EUR 616 million. The managers of the funds combine conventional financial analysis with the assessment of environmental and social policies and performance. These funds will only invest in the top 50% of a sector and exclude companies with unsustainable activities or behaviour. For example, our sustainable global equity fund analyses environmental efforts of companies such as dealing with CO₂ emissions and energy use over the last 2 to 5 years. The funds are marketed through ING's business units in Europe, the US and Australia under various names.

ING Investment Management Belgium offers private investors the opportunity to invest their money in its Alternative Energy Growth Fund. This fund includes shares of company that are active in alternative energy, such as hydro-electric power, wind power and rape seed oil.

ING Bank in the Netherlands offers sustainable portfolio management to private banking clients and institutions, such as charities and foundations. Assets under portfolio management come to EUR 157 million. ING Bank's SRI department has dedicated consultants and analysts to provide investment information. Advisors sustainable investments are appointed in the local Dutch districts to support clients on an individual basis, using both traditional analysis as well SRI analyses. The advisors manage about EUR 216 million. Additionally ING Private Banking has advised to invest EUR 11 million third party funds.

The equity sales department of ING Equity Markets has offered its clients brokerage services for institutional socially responsible investment since 2002. By keeping clients informed about SRI developments, the department hopes to generate business in this field. In 2006, the department organised several events, sent out regular newsletters and published sector studies that focus on sustainability issues into account, such as:

- European Utilities. Climate change; when hell freezes over (October 2006)
- Food and beverages: Climate change; food versus oil (December 2006)

Since September 2006, ING Bank in the Netherlands has been offering its clients the opportunity to invest in the 'Oikocredit Nederland Fonds', a specialised microfinance fund. ING clients also have the possibility to invest in other sustainable or social funds.

Sustainable assets under management

in EUR million	2006	2005	2004
Postbank Green total portfolio	833	781	720
Sustainable global equity funds managed by ING IM			
ING Bank Duurzaam Rendement Fonds	43	41	37
Postbank Duurzaam Rendement Fonds	16	13	10
INI Duurzaam Rendement Fonds	337	359	359
ING (L) Invest Sustainable Growth	36	33	30
ING (L) Selectis Sustainable Distribution	25	27	32
ING (B) Invest Solidarity Mixed Euro	2	2	2
ING (L) Selectis Alternative energy growth	76		
ING Sustainable Investments	14	14	11
Wholesale Global Share Trust			
ING Sustainable Investments Wholesale	42	34	25
Australian Share Trust			
Enhanced Core Socially Responsible Equity Common Trust	25		
Sustainable global equity funds managed by ING Private Banking			
Sustainable Portfolio Management	384	372	277
Ethical portfolio management			
Socially Responsible Enhanced Core Equity Fund II	14		
Sustainable assets externally managed	435	430	320
Total	2,282	2,106	1,824

Economic performance

Our financial and corporate performance is detailed in our Annual Report, which is published in both English and Dutch every year in March. The annual accounts are presented for approval at the Annual General Meeting of Shareholders. Printed copies in both languages are available on request and current and previous Annual Reports are available online at www.ing.com, together with further information on our financial performance.

Direct economic value

in EUR million	2006	2005	2004
Balance Sheet			
Total Assets	1,226,300	1,158,600	964,500
Capital and reserves	38,300	36,700	28,200
Income			
Insurance operations	59,642	57,403	55,614
Banking operations	14,195	13,848	12,678
Profit before tax	9,940	8,894	7,740
Net profit	7,692	7,210	5,755
Assets under management	600,000	547,400	492,000
Sustainable assets under management	2,282	2,106	1,824
Personnel expenses: Salaries	5,492	5,324	5,236
Personnel expenses: Social charges and other	2,426	2,322	2,431
Charitable donations	18.9	14.3	12.5

Financial implications of Climate Change (EC2)

To get a better understanding of climate change related issues, ING joined the Global Roundtable on Climate Change (GROCC), an initiative of The Earth Institute at Colombia University in 2005. We aim to learn more about the scientific, technological and economic issues surrounding climate change. This knowledge will help us better understand the risks facing our business and our clients, as well as new business opportunities that may arise. In 2007, we aim to sign the Climate Change Statement of the GROCC.

One of the larger risks for the insurance industry in the long term may well be the effects of global warming and climate change. A change in weather patterns and sea levels could affect the property and casualty insurance industry. Other lines of business, such as life, disability and health insurance, might also be affected due to the secondary effects of natural disasters.

Several business units have been dealing with the topic of climate change:

- ING Car Lease has been offering its Dutch customers the opportunity to only lease energy efficient cars since 2006.
- Wholesale Banking finances new initiatives and projects that contribute to protecting the climate. Against the background of rising energy prices, investments in renewable energy are becoming increasingly attractive. At the end of 2006, ING Green Finance had invested EUR 118 million in green energy projects.
- ING Wholesale Banking assists clients in Eastern Europe and Asia to identify and structure emission reduction projects.
- For institutional clients, ING Equity Markets publishes sector studies that take climate change into account.
- ING Investment Management offers a range of sustainable investment opportunities. Our sustainable global equity fund has been analysing company trends in dealing with CO₂ for the last two years and only invest in the top 50% ('best in class') of a sector.

Economic performance continued

- ING Bank's Socially Responsible Investment (SRI) department offers sustainable portfolio management to private banking clients and institutions. The department offers analyses of the social and environmental performance of companies in which ING clients can invest. This analysis includes information on energy savings and CO₂ reductions programmes.



For more information on sustainable products please see pages 17 and 19 of this report.

For the second year in a row, ING has been listed as a 'best in class' company in the Carbon Disclosure Project's Climate Leadership Index (CLI). The CLI comprises 50 FT500 companies that are among the sector leaders in their responses to the climate change challenge. The Carbon Disclosure Project was launched by institutional investors and sends an annual questionnaire on climate protection to 2,100 of the biggest companies in the world. The survey asks them to provide information on their climate strategy, the tangible measures they are taking and the greenhouse gas they generate.



For more information, please visit the site of the Carbon Disclosure Project www.cdproject.net

Our global internal environmental statement emphasises ING's care for the environment. The statement describes ING's approach to prevent, manage and reduce the environmental impacts of its operations. Furthermore, ING Group plans to be carbon neutral by year-end 2007. In order to meet our target of carbon neutrality, or net zero CO₂ emissions, we will expand our current energy programme by continuing efforts to improve energy efficiency, by increasing the purchase of green electricity and by compensating all remaining carbon emissions through (re)forestation.



More information on ING's Environmental Statement can be found on page 35 of this report.

Locally-based suppliers (EC6)

Within ING 20 local procurement departments purchase goods and services for our business units from many suppliers world-wide. This arrangement enables local business units to take local law, customs and culture into account in their procurement processes. At group level our Corporate Operations and Information Services department deals with six global IT suppliers.

Local hiring of senior management (EC7)

The selection of senior management is based on a number of considerations. ING recognises that the inclusion of management from the local area enhances human capital and ING's ability to better understand local needs. However, cross-border assignments are also of importance to ING's business. They ensure the transfer of best practices, stimulate the development of business and enhance the cooperation and understanding within the global organisation.

Social performance Labour conditions

Skilled and engaged employees are crucial to ING's success. ING continuously invests in developing the potential of its people. Open communication, diversity and learning are part of this, as is contributing to the local community. (INT1)

Strengthening performance

ING aims to create a climate in which people are willing and able to perform. We call this the 'performance culture' and it builds on shared direction, focus on execution and human capital development. Our approach towards responsibility is an integral part of this. Through yearly Performance Culture/Engagement Scans, we measure how we are doing and where we need to improve. We also aim to recruit and develop talent with leadership and performance potential.

Policies relating to ING staff focus on the following aspects:

- Labour relations
- Human rights
- Good working conditions
- Occupational health and safety
- Training and education
- Diversity



Please visit our website for details on our HR policies www.ing.com/cr under Principles and Policies

Human Resources Department

Group Human Resources (Group HR) strives to a business-driven HR function with a clear focus on strength, depth and diversity of workforce as well as instilling a performance culture. The Group HR management team is responsible for defining HR strategy, policies and direction. It also defines HR goals which support the strategic objectives of ING and the management of HR within ING. The head of Group HR reports directly to the Chief Executive Officer.

PROGRESS REPORT (Social performance – Labour conditions)

2006 Progress	2007 Goals
<ul style="list-style-type: none"> • We have further incorporated corporate responsibility as part of our leadership development curriculum and in general staff education programmes. • Employee engagement questions have become an indispensable part of the Performance Scan, which is conducted yearly across every business line and region. • The percentage of women in the Management Council has increased from 6.4% in 2005 to 7.3% in 2006. 	<ul style="list-style-type: none"> • ING will develop and implement an environmental awareness programme for employees, including training on corporate responsibility issues. • ING continues to adjust its focus from measuring 'employee satisfaction' towards measuring and encouraging employee engagement.

Social performance – Labour conditions continued

Employee profile (LA1, INT7, LA2, INT2)

At year-end 2006, ING had 119,801 FTEs (Full Time Equivalents). The total number of employees that left ING was 19,131. Overall, the workforce increased from 116,614 to 119,801 FTEs as several business lines and units continued to grow.

The share of employees in the Benelux has declined in the past three years due to our growing operations in Asia and Latin America.

GEOGRAPHICAL BREAKDOWN OF FTEs

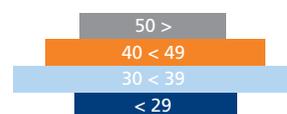
Netherlands	33,038
Belgium	12,519
Rest of Europe	21,821
North America	18,292
Latin America	14,130
Asia	17,660
Australia	2,341
Total	119,801



BREAKDOWN OF WORKFORCE BY AGE IN HEADCOUNT

Covering 116,808 employees

Employees 50 and older	19,629
Employees 40-49	30,906
Employees 30-39	41,615
Employees 29 and younger	24,658



BREAKDOWN OF WORKFORCE FULL TIME/ PART TIME

in number of employees	2006	2005	2004
Full time	105,000	98,300	94,900
Part time	14,200	14,300	14,700
coverage in employees	119,200	112,600	109,600

BREAKDOWN OF WORKFORCE BY TYPE OF CONTRACT

in number of employees	2006	2005	2004
Permanent/indefinite contract	110,500	106,500	104,800
Temporary/fixed contract	7,600	6,100	5,100
coverage in employees	118,100	112,600	109,900

Diversity (LA13, LA14)

ING has a broad customer base world-wide. To understand customers' needs, we need to reflect their diversity in our workforce. We believe that encouraging diversity is not only our social responsibility but also a long-term business advantage.

The Diversity Mentoring Programme, which will be extended to 100 mentors in 2007, is a cross-business line programme that supports the mentoring of talented staff by Executive Board and International Management Council members (IMC) with a different background from the person they mentor.

Different internal staff minority networks are increasingly active and effective in promoting the recruitment and development of people from diverse backgrounds. ING is involved in employee exchange programmes with other companies. Graduates from top Indian universities can participate in a special talent programme at ING.

* The Executive Board expects the top management of ING to actively participate in the Group's future development. IMC is an integral part of this. In 2006, the IMC consisted of 164 ING managers who are essential to ING's strategy and success.

BREAKDOWN BY GENDER

INTERNATIONAL MANAGEMENT COUNCIL*

in percentages	2006	2005
Male	92.7	93.6
Female	7.3	6.4
Total	164	171

SENIOR MANAGEMENT

in percentages	2006
Male	69.3
Female	30.7
Total	3,252
coverage in employees	119,400

TOTAL WORKFORCE

in percentages	2006	2005	2004
Male	51.9	51.3	52.2
Female	48.1	48.7	47.8
coverage in employees	119,400	112,600	110,000

Social performance – Labour conditions continued

Diversity (LA13, LA14) continued

ING has won the 2006 Diversity Award in the Netherlands because of its pioneering role, persistence and consistency in policy. In the United States ING received the top score in the Corporate Equality Index, a measure of gay, lesbian, bisexual and transgender equality in corporate America.

Working conditions

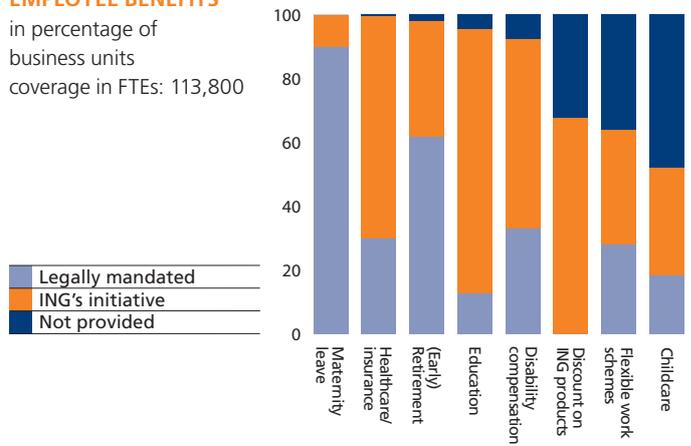
ING believes good working conditions are a prerequisite for staff to deliver excellent performance. Therefore, we strive to distinguish ourselves as a top employer by providing excellent primary and secondary benefits. Each business line has designed specific remuneration, incentive and benefit plans. Employee rewards are linked to market and performance.

Health and safety policies (LA 8)

ING provides its employees with safe working conditions and adheres to relevant local and safety regulations. ING encourages staff to live healthy lifestyles and keep fit, for example by sponsoring marathon events around the world and by encouraging staff to take part in these and other running events.

EMPLOYEE BENEFITS

in percentage of business units
coverage in FTEs: 113,800



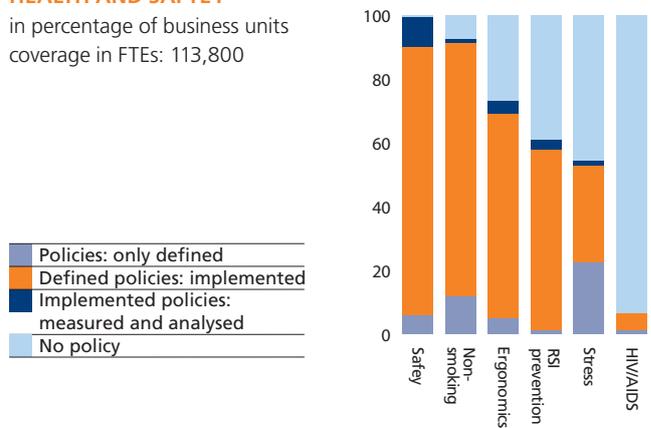
SICKNESS RATE

in percentage of days worked

	2006	2005
Sickness rate	3.0	2.9
coverage in FTEs	85,300	89,300

HEALTH AND SAFETY

in percentage of business units
coverage in FTEs: 113,800

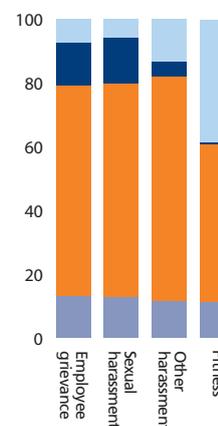
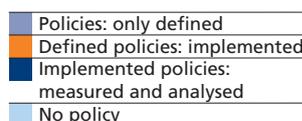


Social performance – Labour conditions continued

Working conditions continued

WORKING ENVIRONMENT

in percentage of business units
coverage in FTEs: 113,800



Labour relations

Consultation about restructuring (LA5)

In close collaboration with unions and works councils ING has incorporated a principle in its social plans that stipulates both employer and employees are responsible for the 'employability' of the employees.

Outsourcing

In order to maintain our position in increasingly competitive local and global markets, we continued to focus on efficiency and service. This has resulted in a workforce reduction 960 FTEs since 2005 due to the streamlining of business activities and a further reduction of 1,480 employees in 2006 through outsourcing. The overall number of FTEs rose to 119,801.

ING does its utmost to support those employees affected by staff reduction programmes. In the case of streamlining, either severance pay schemes or collective labour agreements apply and we observe local laws and regulations.

REASONS FOR DEPARTURE FROM ING

in number of employees	2006	2005	2004
Own initiative	12,359	9,243	8,122
Initiative of ING	5,694	5,647	4,430
(Early) Retirement	806	1,982	781
Deceased	102	103	105
Occupational disability	170	180	87
Total	19,131	17,155	13,525
coverage in employees	119,400	112,600	108,800

Training & development

ING is dedicated to leadership development and training. We aim to create a climate in which people are willing and able to perform. We call this our 'performance culture'. It builds on shared direction, focus on business execution and human capital development. We aim to recruit and develop talent with leadership and performance potential. In 2006, ING introduced a new global Employer Brand "Doing Well by Doing Right" and launched the first ING International Graduate Programme for young people with leadership potential. The aim is to further develop a pool of future leaders.

BUDGET FOR TRAINING

in EUR	2006	2005	2004
Budget for training per FTE	840	740	750
Total budget in millions	94.9	79.4	79.3
coverage in FTEs	112,800	106,800	105,400

Social performance – Labour conditions continued

Training & development continued

ING recognizes the importance of personal development. It is a way to retain people within ING, but it also helps employees to keep up with a changing environment. ING provides facilities, such as training programmes, time and subsidies. Besides the budget spent on training (see the table on page 25), ING organised several in-house trainings, such as the wholesale banking introduction course and the online compliance course in The Netherlands.

In 2006, we further extended our training programme on corporate responsibility. Sustainability is, for example, an indispensable part of ING Business School's curriculum and of the wholesale banking introduction course.

Employees are also responsible for taking own initiatives to support their personal development, in conjunction with their managers, by signing up for training programmes. To make personal growth tangible and measurable, employee and manager can draw up a Personal Development Action Plan. This plan functions as a blueprint for the employee's future with ING and as a reference tool for rewards.

Employee engagement

ING is gradually changing from measuring employee satisfaction towards measuring and stimulating employee engagement. Based on experiences from different businesses, we have learned that engagement is a much better indicator of how motivated and committed people are to their job. Since 2006, employee engagement questions have become an indispensable part of the Performance Scan, which is conducted yearly across every business line and region. We aim to report on employee engagement in our Corporate Responsibility Report 2007.

ASPECTS OF EMPLOYEE SATISFACTION MEASURED

in percentage of business units	2006	2005
Training & Development	94.4	78.9
Balance between work and personal life	82.1	70.4
Working conditions	80.4	77.9
Working atmosphere	93.3	77.9
Co-operation and communication	92.7	77.1
Management	92.7	77.3
Job security	76.5	70.4
Identification with corporate values and strategy	92.3	77.8
Remuneration and benefits	91.5	75.8
Equal opportunities	83.2	73.1
coverage in FTEs	113,800	105,400

DEVELOPMENT EMPLOYEE SATISFACTION

in percentage of business units	2006	2005
Increasing	14.7	49.2
Stable	36.4	19.5
Declining	6.0	0.1
Results employee satisfaction not available	42.9	31.2
coverage in FTEs	113,800	106,100

Social performance Human rights

The ING Business Principles state that ING supports the aims of the United Nations Universal Declaration of Human Rights and aims to apply its principles throughout its operations world-wide. In December 2006, ING adopted a new Human Rights Statement relating to its employees and its commitment to the principles of the United Nations Global Compact.

i For more information please visit www.ing.com/cr

Screening of financing agreements (HR1)

For credit lending and project financing, ING Wholesale Banking has internal guidelines designated to mitigate social, ethical and environmental risk. These guidelines cover various issues and sectors, including human rights issues. A specialised team advises on applying these guidelines to relevant transactions. In 2006, a number of transactions were submitted to assess whether they met the guidelines and 25 were declined. ING is also committed to the Equator Principles. Under these principles ING must address human right issues when financing projects. For more information on the Equator Principles and its scope, see pages 15 and 16 of this report.

Screening of suppliers (HR2, SUP2)

During the procurement process ING follows its Procurement Principles and Policies. These include the Procurement Code of Conduct which describes the ethical behaviour with which each procurement staff member must comply. In line with the Procurement Code of Conduct requirements regarding

ethical issues – such as those covered by ING codes of conduct, child labour, health and safety and environmental regulations – are standard features in ING’s contracts. Once a supplier is selected, the business unit involved, together with the procurement department, manages the contract and ensure that the supplier meets all the contract obligations.

i For more information on our policy relating to suppliers please visit www.ing.com/cr under Principles and Policies.

Human Rights in the workplace (HR4, HR6, HR7)

In December 2006, ING adopted a Human Rights Statement relating to its employees. With this statement, we express our commitment to support international labour rights standards for our employees. We consider certain human rights fundamental and universal for our work force. These rights include freedom of association, the right to collective bargaining and freedom from discrimination based on race, colour, sex, religion, political opinion, national and social origin. ING upholds the elimination of all forms of forced labour and child labour.

Freedom of association and collective bargaining (HR5)

ING opts for a pro-active approach in employee engagement, by informing its people through regular dialogue. One of the tools to this end is dialogue through employee representation, an important form of stakeholder engagement. Under our Human Rights Statement, we uphold the freedom of association for all our employees and recognise the right to collective bargaining. Over 56% of ING’s business units have collective bargaining agreements in place. The way in which the right of freedom of association is implemented differs per region.

PROGRESS REPORT (Social performance – Human rights)

2006 Goal	2006 Progress	2007 Goal
<ul style="list-style-type: none"> ING will review wholesale banking’s compliance with the human rights policy. 	<ul style="list-style-type: none"> ING has integrated Human Rights in the new Sector Environmental and Social Risk Policies. Amnesty International played a constructive role in the process as stakeholder. ING has adopted Human Rights Statement for its employees. ING has committed to the principles of the UN Global Compact. 	<ul style="list-style-type: none"> ING will train approximately 80% of its teams involved in transactions and/or engagements that are subject to ING’s Environmental and Social Risk Policies on subjects including human rights.

Social performance – Human rights continued

Europe

ING's European Works Council (EWC) convened twice in 2006 for a consultative meeting with the Executive Board. The EWC sub-committee members also met with the Executive Board and Management Council for more informal discussions on financial results, portfolio management and sourcing.

The Netherlands and Belgium

The Dutch Central Works Council and its Belgian counterpart are the main dialogue partners for employee consultation in the Netherlands and Belgium. Subjects tabled in 2006 included the financial results, several reorganisations within Dutch and Belgian business units, a sourcing protocol for the Netherlands and the ING Renault Formula One sponsorship programme.

Americas

There are no works councils in the Americas and no trade union representation in the United States, Canada and Peru. In the United States and Canada, ING set up an Ombudsman programme to provide dispute resolution in cases where issues cannot be resolved between an employee and his or her immediate superior. In Mexico and Chile, unions play a role in concluding collective contract agreements for some of their employees.

Asia/Pacific

South Korea has an employee management council, consisting of employees and management members. Its aim is to give employees a say on company policy and maintain harmony between management and workers. In the other Asian countries there are no unions or works councils. In Australia, a collective bargaining agreement is negotiated between the company management and employees with no union involvement.

Social performance Society

ING strives to be a good corporate citizen by playing an active role in the communities where it operates and through corporate sponsorship, donations and staff volunteer work. We take note of global issues and participate in many discussions revolving around corporate responsibility. Our activities vary in each business unit and country and depend on the culture and needs of the community as well as the choices of ING staff and management.

PROGRESS REPORT (Social performance – Society)

2006 Goals	2006 Progress	2007 Goals
<ul style="list-style-type: none"> • ING Chances for Children aims to provide 35,000 children in developing countries with access to primary education. • ING will contribute to microfinance by making available technical expertise. • ING will establish new volunteer projects and align existing projects with a focus on primary education. 	<ul style="list-style-type: none"> • ING Chances for Children has provided 52,000 children in developing countries with access to primary school for one year. • ING employees undertook 103,000 hours of voluntary work. • ING made 24 advisors available to provide technical assistance to microfinance institutions for a period of 4 to 8 weeks. 	<ul style="list-style-type: none"> • ING Chances for Children aims to provide 115,000 children in developing countries with access to primary education for one year. • ING will establish a global volunteering programme for employees. • ING aims to make 30 advisors available for technical support.

Social performance – Society continued

Community Development (SO1)

We see community development as a way to build sustainable relationships with local communities and demonstrate our commitment to society. We also actively encourage ING staff to participate in community projects.

Our main global community development programme is called ING Chances for Children. This programme allows us to get involved in local communities on a global scale. Based on the UN Millennium Development Goal to achieve universal primary education, the ING Chances for Children programme has two main aims: to support child education in Brazil, Ethiopia and India in close cooperation with the United Nations Children’s Fund (UNICEF); and to improve child education closer to home through local volunteer projects.

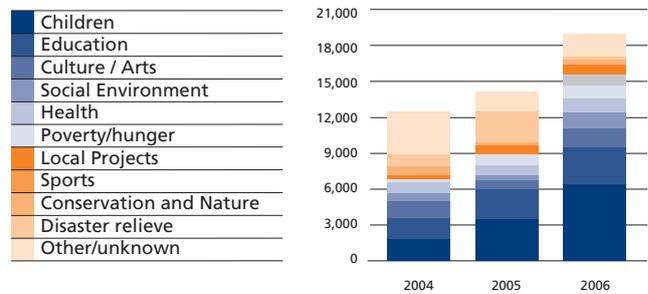
i For more information on ING Chances for Children go to www.ingchancesforchildren.com

The amount spent on children and education has grown over the last three years in line with the ING Chances for Children programme. About 50% of our charitable contributions was spent on children and education in 2006.

ING’s contribution to disaster relief was lower than in 2005. This was due to the 2005 figures including the rehabilitation funds for victims of the Asia Tsunami and hurricanes in North America. For more information please see the ING CR Report 2005.

BREAKDOWN OF CHARITABLE CONTRIBUTIONS BY CATEGORY

in EUR thousands



BREAKDOWN OF CHARITABLE CONTRIBUTIONS BY CATEGORY

in EUR thousands

	2006	2005	2004
Children	6,400	3,500	1,800
Education	3,100	2,500	1,800
Culture/Arts	1,600	700	1,400
Social Environment	1,300	500	600
Health	1,200	800	1,000
Poverty/hunger	1,100	900	200
Local Projects	900	n/a	n/a
Sports	800	800	400
Conservation and Nature	500	200	700
Disaster relief	200	2,600	1,000
Other/unknown	1,900	1,700	3,600
Total	18,900	14,300	12,500

Social performance – Society continued

Volunteering (SO1)

The ING Business Principles promote staff involvement in the community. Volunteering is more than donating time and expertise: it is a demonstration of commitment and involvement. 43% of ING's business units have implemented formal policies for volunteering.

We believe that engaging employees in community development improves our culture and performance. It increases employee motivation, enhances their people skills and improves recruitment and retention efforts. Several business units have set up foundations or programmes that engage employees in community development. Details can be found on the following websites:

ING USA	www.ing-usa.com
ING Kids Fund USA	www.savekidsnow.org
ING Australia	www.ingfoundation.com.au
ING Vysya India	www.ingvysyafoundation.com
ING Canada	www.ingcanada.com
ING Direct Canada	www.ingdirect.ca
ING Poland	www.ing.pl

VOLUNTARY WORK BY ING EMPLOYEES

in hours	2006
Voluntary work	103,000
coverage in FTEs	74,300

Art & Culture

The ING Collection started over 25 years ago and offers a comprehensive overview of contemporary Dutch figurative art since 1950. The Collection initially began to create a pleasant work environment by displaying works to decorate the workspace and the public open spaces at ING. However, over the years, the Collection has come to serve additional purposes. Art was also added as a result of acquisitions throughout the years. Collecting art expresses ING's role as an art patron and reflects its societal and cultural responsibilities. The museological Collection now comprises of 20,000 works of art which decorate 1,300 ING offices world-wide.

BUDGET FOR ARTS & CULTURE

in EUR thousands	2006	2005
Culture/Arts	4,400	2,700
coverage in FTEs	105,600	98,600

Sport Sponsoring (SO1)

For ING, sport sponsorship means building sustainable relations with society and making commercial decisions. The relationship with the sponsored organisation, activity or event should provide ING with branding, marketing and PR opportunities.

We have developed two global sports sponsorship programmes at group level:

- ING Globerunners supports marathons and other running events around the world, such as the ING New York City Marathon.
- In October 2006, ING has entered into a three-year title sponsorship agreement with the Renault F1 Team, from the start of the 2007 race season. The sponsorship will give ING year-round global exposure.

Social performance – Society continued

Bribery and Corruption (SO2 and SO3)

The Business Principles state that ING expects the highest levels of personal conduct by all its employees, whatever their position. It is acknowledged that all effective business relationships, inside as well as outside ING, depend on honesty, integrity and fairness. Beyond this general approach through the ING Business Principles, there is also more specific compliance training, including training on corruption related issues, throughout ING. In 2006, employees in the Netherlands had to complete a compliance e-learning course and in the United States a Compliance Awareness Week was held.

Public policy positions and participation in public policy development and lobbying (SO5)

ING is a commercial organisation and our activities are business oriented. Therefore ING does not intervene in political matters, nor do ING companies make gifts or donations to political parties or candidates for political office. However, within the legitimate role of business, through all available, legitimate means and after careful consideration, ING reserves the right to speak out on matters that affect our businesses, employees, shareholders, and/or customers. In countries where there is a legal framework to do so, ING reserves the right to facilitate employee contributions to political parties or candidates for political office.

Compliance (SO8 and CSR 5)

Information on compliance is included in the chapter on governance and compliance on pages 8 and 9 of this report and pages 18 and 19 of the Annual Report 2006.

Social performance Customers

Our mission is to help our customers manage their financial future. We do this by putting our customers first, developing long-term relationships and providing competitive products and services in the most accessible manner. Offering clear prices and conditions of purchase are important factors. We want to inform our customers correctly about the financial choices they make. That is why we provide transparent sales instructions and promote clear communication.



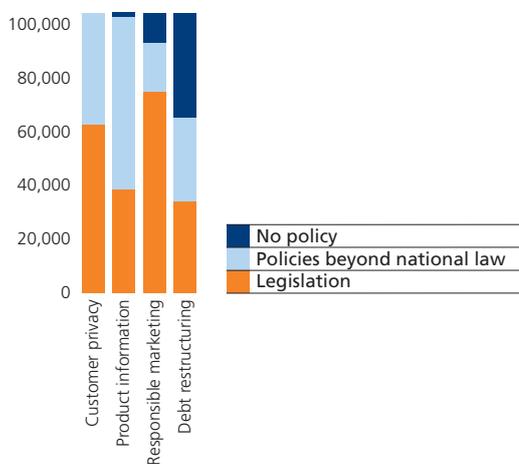
For more information on customers please refer to pages 14 to 23 of the Annual Review 2006.

PROGRESS REPORT (Social performance – Customers)

2006 Goal	2006 Progress	2007 Goal
<ul style="list-style-type: none"> ING will continue with its customer-centric approach. 	<ul style="list-style-type: none"> 81% of the business units have measured customer satisfaction at least once a year. ING has launched a number of initiatives, especially in mature markets, to improve customer centricity (see Annual Review 2006). 	<ul style="list-style-type: none"> ING continues to monitor customer satisfaction and remains focused on a customer-centric approach.

Social performance – Customer continued

POLICIES TO PROTECT CUSTOMERS
in number of FTEs



Product Information and Responsible Marketing (PR3 and PR6)

The integrity of our operations depends on our ability to offer products and services that benefit our customers. From the moment a product is conceived to the end of its life cycle, ING bears a wide range of responsibilities and obligations towards customers. ING has a product review process in place to ensure that new products are not only introduced in a proper and timely way but also that these products meet all regulatory requirements of consumer protection.

We aim to provide suitable products and correct advice. Therefore, we require our staff to act according to ethical principles and we offer extensive training programmes to independent as well as tied agents.

Several ING business units have taken innovative steps to help their customers to make sound financial decisions, by giving them more information about the products or by making the products simpler to understand. Examples are included on pages 15 to 17 of the Annual Review 2006.

The Dutch life insurance sector is faced with complaints of policy holders concerning the costs and transparency of unit-linked life insurance products. Further details are included on page 154 of the Annual Report 2006.

Customer Privacy (PR8)

We are committed to safeguarding our customers' confidentiality. Customer privacy is mainly governed by local laws, including specific banking secrecy laws. A growing number of bank transactions take place via the internet and we invest in state-of-the-art security systems so that customers can perform these transactions safely.

Customer satisfaction and complaints (INS3)

ING focusses on its core business with the aim to serve satisfied customers. Over the past two years, ING has launched a number of initiatives to improve on customer centricity. To keep track of our progress, we continually monitor customer satisfaction.

Environmental performance

Through our buildings, our business operations, our staff and our use of utilities, we have a direct impact on both our immediate surrounding and the environment as a whole. In 2005, ING issued a new global internal environmental statement, which emphasises ING's care for the environment. The Statement underlines ING's belief that healthy economic growth and care for the environment can co-exist, and that companies like ING have a role to play in contributing to sustainable development. The statement outlines three areas in which ING believes its impact on the environment is most significant and which can be controlled effectively: energy consumption, business travel and paper consumption. The statement applies to all ING business units world-wide and was implemented in 2006.

i For the full Environmental Statement please visit www.ing.com/cr under Policies and Principles (Environmental Care).

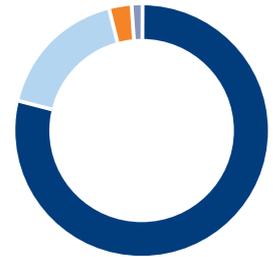
Environmental Footprint

In 2006, an independent consultant, DHV, investigated our environmental footprint and developed an 'ecopoint' system to identify the relative significance of the environmental impacts associated with our various operational activities. According to this system, 99% of ING's footprint is caused by the focus areas set out in our environmental statement: energy usage, business travel and paper usage.

ENVIRONMENTAL FOOTPRINT ING

Based on 2005 figures

Energy	79
Business travel	17
Paper	3
Office, water and waste	1



For information on the environmental impact of our business operations, please refer to the following pages in this report:

- Pages 15 and 16: Equator Principles
- Pages 17, 18 and 19: Sustainable Products
- Pages 20 and 21: Economic Impact of Climate Change

PROGRESS REPORT (Environmental performance)

2006 Goal	2006 Progress	2007 Goals
<ul style="list-style-type: none"> • ING will reduce or compensate for the impact of energy consumption, business travel and paper consumption. 	<ul style="list-style-type: none"> • ING reduced its carbon footprint by 26% compared to 2005. • 17.4% of ING's electricity came from renewable sources. • 44% of the energy purchased by ING in the Netherlands came from renewable sources. • 100% of the emissions caused by business travel are compensated. • Several business units have implemented programmes to reduce the paper usage. 	<ul style="list-style-type: none"> • ING aims to be carbon neutral in 2007. • ING will launch an environmental awareness programme for its employees to further reduce its impact on the environment. • 100% of the energy purchased by ING in the Netherlands comes from renewable sources. • In the Netherlands ING will sign a covenant with FSC (Forest Stewardship Council) to purchase environmentally friendly paper only.

Environmental performance continued

CO₂ footprint (EN16, EN17)

In 2006, ING reduced its CO₂ footprint to 282 Kton. Renewable electricity purchased accounted for 39 Kton reductions made. A further 59 Kton emissions from business travel was compensated for supporting the planting and rehabilitation of degraded tropical rainforest around the Danum Valley Conservation Area in Sabah, Malaysia.

Combined efforts to purchase green electricity and to offset carbon emissions from business travel, reduced and/or offset ING Group carbon emissions by 26% compared to 2005 levels.

 More information about this project can be found on www.ing.com/cr under ING and Climate Change

GROSS CO₂ EMISSIONS REPORTED

in kilotonne, based on an average coverage of 90%	2006	2005
Electricity	213	244
Natural gas	43	35
Fuel oil	7	5
Air travel	20	21
Car travel	19	17
Total	302	322

GROSS CO₂ EMISSIONS EXTRAPOLATED TO 100% COVERAGE*

in kilotonne	2006	2005
Electricity	226	275
Natural gas	48	40
Fuel oil	8	6
Air travel	29	30
Car travel	30	25
Total	341	376

* In order to meet our target to compensate for emissions from business travel, we extrapolated our reported figures to 100% coverage.

NET CO₂ EMISSIONS AFTER COMPENSATING BUSINESS TRAVEL

in kilotonne	2006	2005
Electricity	226	275
Natural gas	48	40
Fuel oil	8	6
Air travel	0	30
Car travel	0	25
Total	282	376

Energy (EN3, EN4)

Energy consumption

The majority of our business units have started the process of implementing or improving in-house energy efficiency programmes. These programmes reduce our direct impact on the environment, while at the same time lowering our energy costs.

BREAKDOWN OF ENERGY CONSUMPTION

in GJ	2006	2005	2004
Electricity	2,098,700	2,021,100	1,909,400
Natural gas	900	700	700
Fuel oil	99,200	69,300	68,900
District Heating	138,500	164,400	166,000
Total	2,337,300	2,255,500	2,145,000

Environmental performance continued

Energy (EN3, EN4) continued

ING encourages business units to purchase green energy if and where possible. The vast majority of the energy used by ING is derived from electricity. The amount of electricity from renewable sources (green electricity) is increasing. In 2006, ING purchased 102,000 kWh green electricity. This is 17.4% of total electricity.

From 2007, ING will purchase green electricity for our offices in the Netherlands.

In the Netherlands, an energy efficiency agreement applies to the financial services industry, endorsed by ING. In accordance with this agreement, Facility Management continuously monitors energy usage within ING's Dutch operations.

More information can be found on www.ing.com/cr under Principles and Policies.

ENERGY EFFICIENCY PROGRAMMES

In percentage of business units

Implementation status	2006
Established	59.6
In development	30.1
Not started	10.3
coverage in FTEs	111,400

ELECTRICITY CONSUMPTION

	2006	2005	2004
kWh (in thousands)	583,000	561,400	530,400
GJ	2,098,700	2,021,100	1,909,400
Coverage in FTEs	111,400	102,900	91,400
kWh/FTE	5,300	5,500	5,800
GJ/FTE	18,800	19,600	20,900

NATURAL GAS CONSUMPTION

	2006	2005	2004
M3 (in thousands)	22,300	18,400	18,000
GJ	900	700	700
Coverage in FTEs	106,600	76,700	82,800
M3/FTE	210	240	220
GJ/FTE	8,100	9,400	8,500

FUEL OIL CONSUMPTION

	2006	2005	2004
Litres (in thousands)	2,600	1,800	1,800
GJ	99,200	69,300	68,900
Coverage in FTEs	106,600	57,200	65,400
Litres/FTE	25	32	28
GJ/FTE	900	1,200	1,100

Business travel

Business travel is an inherent part of ING's activities in more than 50 countries. The company encourages its people to only make business trips if other forms of communication do not suffice.

Commuter traffic

In 2006, 72% of the business units actively encouraged the use of public transport. 23% of the business units implemented a transport management plans and another 43% are developing one.

Since 1 January 2006, a new policy for company cars for ING Netherlands employees states that new cars running on diesel have to be fitted with special root filters, thus adhering to certain emission restrictions. Approximately half of the ING company cars in the Netherlands have diesel engines. In addition, from 1 January 2006, all new company cars in the Netherlands are required to meet the category A, B or C energy restrictions.

BUSINESS TRAVEL EFFICIENCY PROGRAMMES

in percentage of business units

	2006
Established	22.9
In development	42.6
Not started	34.5
coverage in FTEs	111,400

BUSINESS TRAVEL BY AIR AND CAR

in km	2006	2005	2004
Car travel*	84.4mln	74.4mln	70.4mln
Car travel per FTE*	1,100	1,400	1,000
Air travel	154.6mln	28.7mln	n/a
Air travel per FTE	1,800	2,800	n/a
coverage car travel in FTEs	74,600	51,400	69,000
coverage air travel in FTEs	84,900	34,900	n/a

*Distance travelled in company cars by ING employees is not included

Environmental performance continued

Paper (EN1, EN2, EN22)

Due to our improved CR tool the reported figures on paper usage have a significant higher coverage than last year. In 2007, we will start a programme to increase the environmental awareness of our employees and thereby reduce paper consumption.

ING aims to reduce its paper consumption by making greater use of electronic communications such as internet, intranet and document imaging.

ING encourages business units to use environmentally friendly paper that comes from sustainable sources. In 2006, 56% of the office paper came from sustainable sources.

PAPER USE EFFICIENCY PROGRAMMES

in percentage of business units	2006
Established	24.5
In development	51.7
Not started	23.9
coverage in FTEs	111,400

PAPER PURCHASE

in millions kilo	Total	Coverage	Per FTE
Office paper	6.0 mln kg	106,000	57 kg
Organisational printed matters	4.4 mln kg	48,900	91 kg
Commercial printed matters	10.3 mln kg	45,900	223 kg
Total	20.7 mln kg		371 kg

ORIGIN OF PAPER

in percentages of total paper used	Eco labelled	Standard
Office paper	56	44
Printed material for organisational purposes	62	38
Printed material for commercial purposes	55	45

GRI Index

Strategy and Analysis		CR Performance Report 2006	Notes
1.1	Chairman's statement		See CR Big Picture Report 2006 1
1.2	Key impacts, risks and opportunities	3 (CR Strategy) 13-19 (Our Business)	See CR Big Picture Report 2006 3-10
Organisational profile		CR Performance Report 2006	Notes
2.1	Name of reporting organisation	7	
2.2	Products, services and brands	5	See www.ing.com
2.3	Operational structure	5	See Annual Report 2006 4-5
2.4	Location of head office	7	
2.5	Countries of operation	5	
2.6	Nature of ownership and legal form	5	See Annual Report 59-68
2.7	Markets served	13-19	See Annual Report 2006 22-50 See CR Big Picture Report 2006 3-10
2.8	Scale of the organisation	5, 20	See Annual Report 2006 3 See CR Big Picture Report 2006 inside cover
2.9	Changes during reporting period	5, 7	See www.ing.com under Press Room
2.10	Awards received	throughout report	See CR Big Picture Report 2006
Report Parameters		CR Performance Report 2006	Notes
3.1	Reporting period	6	
3.2	Most recent previous report	6	
3.3	Reporting cycle	6	See www.ing.com
3.4	Contact point	7	See www.ing.com/cr
3.5	Defining the report content	6	
3.6	Boundary of the report	7	
3.7	Specific limitations of the boundary	7	
3.8	Basis for reporting on joint ventures	7	
3.9	Data measurement techniques	7	
3.10	Restatements	7	
3.11	Significant changes	7	
3.12	GRI index	7, 39	
3.13	Assurance	43	

Governance, Commitments and Engagement

Structure and Governance		CR Performance Report 2006	Notes
4.1	Governance structure	8	See Annual Report 2006 59-68
4.2	Function of CEO	8	See Annual Report 2006 59-68
4.3	Independent board members	8	See Annual Review 2006 59-68
4.4	Mechanisms for recommendations	8 (general), 27 (employees)	See Annual Report 2006 59-68 (shareholders), Annual Report 2006 87 (employees)
4.5	Executive compensation	8	See Annual Report 2006 74-86
4.6	Conflict of interest	8	See Annual Report 2006 59-68
4.7	Expertise of the highest governance body	8	See Annual Report 2006 28-29
4.8	Code of conduct	9	See www.ing.com/cr under Principles and Policies
4.9	Management of sustainability performance	8-9	
4.10	Evaluation of performance of governance body	8	See Annual Report 2006 59-68
Commitment to External Initiatives		CR Performance Report 2006	Notes
4.11	Precautionary approach	13-19	
4.12	Externally developed charters	11	
4.13	Memberships	11	
Stakeholder Engagement		CR Performance Report 2006	Notes
4.14	Stakeholder Groups	10-11	
4.15	Identification of stakeholders groups	10-11	
4.16	Approach to stakeholder engagement	10-11	
4.17	Key topics and concern	11-12	

GRI Index continued

Economic Performance Indicators

Customers	CR Performance Report 2006	Notes
EC 1 Direct economic value	20	See Annual Report 2006 13
EC 2 Financial implications due to climate changes	20-21	
EC 3 Defined benefit plan obligations		See Annual Report 2006 136-137
EC 6 Locally-based suppliers	21	
EC 7 Local hiring of senior management	21	
EC 8 Services provided for public benefit	Not reported	We do not have information available at corporate level. However, building local infrastructure can be part of our community development programmes.

Environmental Performance Indicators

ING' environmental footprint indicates that 99% of ING's footprint is caused by energy, business travel and paper usage. Therefore we limit our report to these three areas.

Materials	CR Performance Report 2006	Note
EN 1 Materials used by weight or volume	38	Paper usage
EN 2 Recycled materials	38	Paper usage

Energy and water	CR Performance Report 2006	Notes
EN 3 Direct energy consumption	36-37	
EN 4 Indirect energy consumption	36-37	
EN 8 Total water withdrawal	Not reported	No focus area (see above)

Biodiversity	CR Performance Report 2006	Notes
EN 11 Land owned in biodiversity-rich habitats	15-16	
EN 12 Impacts on biodiversity	15-16	Our impact on biodiversity is restricted to our products. ING applies the Equator Principles for its project finance, managing the risks related to biodiversity.

Emissions effluents and waste	CR Performance Report 2006	Notes
EN 16 Greenhouse gas emissions	36	
EN 17 Other relevant greenhouse gas emissions	36	
EN 19 Use and emissions of ozone-depleting substances	Not reported	Not applicable to financial services provider
EN 20 Air emissions	Not reported	Not applicable to financial services provider
EN 21 Significant water discharges	Not reported	Not applicable to financial services provider
EN 22 Total amount of waste	38	Paper usage
EN 23 Significant spills	Not reported	Not applicable to financial services provider

Products and services	CR Performance Report 2006	Other source
EN 26 Environmental impact of principal products and services	15-16, 17, 19	
EN 27 Percentage of the weight of products sold that is reclaimable	not reported	Not applicable to financial services provider

Compliance	CR Performance Report 2006	Other source
EN 16 Incidents of non-compliance	8-9	See Annual Report 2006 18-19

GRI Index continued

Social Performance Indicators

Labour practices and decent work		CR Performance Report 2006	Notes
LA 1	Breakdown of workforce	23	
LA 2	Employee turnover	25	
LA 4	Collective Bargaining Agreements	27	
LA 5	Significant operational changes	25	
LA 7	Rates of injury/ absenteeism	24	
LA 8	Serious diseases	24	
LA 10	Training	25	
LA 11	Skills management	25	
LA 13	Breakdown by gender	23	
LA 14	Ratio of basic salary of men and women	Not reported	We cannot give a proper insight of ratios on salaries, as the construction of salaries consists of many variables, like longitude of the employment, age, country and type of job.
Human Rights		CR Performance Report 2006	Notes
HR 1	Agreements that have undergone human rights screening	27	
HR 2	Human rights and suppliers	27	
HR 3	Employee training on human rights	27	
HR 4	Total number of incidents of discrimination	Not reported	Our personnel policy is based on equal opportunities and a non-discriminatory policy. Our local compliance organisations act when incidents are reported.
HR 5	Freedom of Association	27-28	
HR 6	Child labour	28	
HR 7	Forced and compulsory labour	28	
Society		CR Performance Report 2006	Notes
SO 1	Community development programmes	29-31	
SO 2	Risk related to corruption	32	
SO 3	Employee training on corruption	32	
SO 4	Incidents of corruption	32	See Annual Report 2006 18 and 19
SO 5	Public policy positions	32	
SO 6	Non-compliance	32	See Annual Report 2006 18 and 19
Product Responsibility		CR Performance Report 2006	Notes
PR 1	Health and safety impacts of products and services and services	Not reported	Not applicable to financial products
PR 2	Product information and labelling	33-34	
PR 3	Marketing communications	33-34	
PR 8	Customer privacy	33-34	
PR 9	Non-compliance	34	See Annual Report 2006 154

Financial services sector supplement: Social performance

CSR Management		CR Performance Report 2006	Notes
CSR 1	CSR policy	3	See www.ing.com/cr under Policies and Principles
CSR 2	CSR organisation	8-9	
CSR 3	CSR audits	6-7	
CSR 4	Management of sensitive issues	11-12	See www.ing.com/cr under Dilemma's
CSR 5	Non-compliance	8-9, 33-34	
CSR 6	Stakeholder dialogue	10-12	

GRI Index continued

Internal social performance		CR Performance Report 2006	Notes
INT 1	Internal CSR policy	22-26	
INT 2	Staff turnover and job creation	25	
INT 3	Employee satisfaction	26	
INT 4	Remuneration Executive Board		See Annual Report 2006 74-68
INT 7	Employee profile	23	
Suppliers		CR Performance Report 2006	Notes
SUP 1	Screening of major suppliers	27	
SUP 2	Supplier satisfaction	10	
Performance to society		CR Performance Report 2006	Notes
SOC 1	Charitable contributions	30	
SOC 2	Economic value-added	20	
Retail Banking		CR Performance Report 2006	Notes
RB 1	Retail banking policy	14	
RB 2	Lending profile		See Annual Report 2006 38-41
RB 3	Lending with high social benefit	14, 17	
Investment Banking		CR Performance Report 2006	Notes
IB 1	Investment policy	15-16	
IB 2	Customer profile		See Annual Report 2006 34-37
IB 3	Transactions with high social benefit	17	
Asset Management		CR Performance Report 2006	Notes
AM 1	Asset management policy	18	
AM 2	Assets under management with high social benefit	18-19	
AM 3	SRI-oriented shareholder activity	18-19	
Insurance		CR Performance Report 2006	Notes
INS 1	Underwriting policy	13	
INS 2	Customer profile		See Annual Report 2006 22-33
INS 3	Customer complaints	13, 33-34	See Annual Report 2006 22-33
INS 4	Insurance with high social benefit	13	

Assurance Report

TO: STAKEHOLDERS OF ING GROEP N.V.

Engagement

We have performed an assurance engagement in accordance with Standard 3410 "Assurance Standard relating to Sustainability Reports". Our assurance engagement is aimed at obtaining a limited level of assurance that the information in the Performance Report 2006 of ING Groep N.V. (ING) is, in all material respects, an accurate and adequate representation of the efforts made and performance achieved during 2006. Procedures performed to obtain a limited level of assurance are aimed at determining the plausibility of information and are less extensive than those performed in an assurance engagement to obtain a reasonable level of assurance. We did not perform procedures to obtain assurance with regard to the additional information to which the Performance Report 2006 refers.

Criteria

We assessed the Performance Report 2006 of ING against the Sustainability Reporting Guidelines (G3) issued by the Global Reporting Initiative, the Guide to Sustainability Reporting issued by the Dutch Accounting Standards Board and the documented reporting policy of ING. We believe that these criteria are suitable given the purpose of our assurance engagement.

The management's responsibility

The management of ING is responsible for the information in the Performance Report 2006 and the preparation of the report in accordance with the criteria mentioned above. This responsibility comprises, among other things, the design, implementation and maintenance of an internal control system relevant to the preparation of a sustainability report that is accurate and adequate, as well as the selection and use of acceptable principles for measuring and presenting sustainability performance results, and the making of estimates that, under the given circumstances, can be deemed to be reasonable. As explained on page 6 of this report, the Performance Report 2006 forms part of the Corporate Responsibility Report of ING. The choices made by management, the scope of the report and the reporting principles, including the inherent specific limitations that might affect the reliability of information included in the report, are explained on pages 6 and 7 of this report.

The auditor's responsibility

It is our responsibility to formulate a conclusion with regard to the Performance Report 2006 of ING on the basis of the engagement outlined above. We performed our procedures in accordance with Dutch law. This law requires, among other things, that we comply with ethical requirements, including requirements relating to independence.

Our principal procedures were the following:

- Obtaining an understanding of the sector and the relevant social responsibility issues specific for the organisation;
- Assessing the acceptability of the reporting principles used and significant estimates and calculations made in preparing the Performance Report 2006;
- Performing analytical procedures at both group and business line level to assess the quantitative data;
- Examining, on a test basis, evidence supporting the qualitative and quantitative data provided, and studying relevant company documents;
- Conducting interviews with responsible company officers, mainly for the purpose of assessing the plausibility of the descriptive and quantitative data in the Performance Report 2006;
- Evaluating the overall view presented in the Performance Report 2006, in part by assessing its contents against the criteria mentioned above.

Conclusion

On the basis of our procedures aimed at obtaining limited assurance, nothing has come to our attention that leads us to believe that the information in the Performance Report 2006 of ING is not, in all material respects, an accurate and adequate representation of the efforts made and performance achieved during 2006, in accordance with the Sustainability Reporting Guidelines (G3) issued by the Global Reporting Initiative, the Guide to Sustainability Reporting issued by the Dutch Accounting Standards Board, and the documented reporting policy of ING.

**Amsterdam, 5 April 2007
for Ernst & Young Accountants**

Jan J. Nooitgedagt

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This Performance Report 2006 should be read in conjunction with the Corporate Responsibility Report 2006. The Corporate Responsibility Report is available as a pdf file on www.ing.com

Disclaimer

This ING Group Corporate Responsibility Report is made for the purpose of informing our stakeholders and to give details of ING's commitment regarding corporate responsibility. Nothing in this document is intended to extend or amend ING's existing obligations to its clients, shareholders or other stakeholders. All policies, procedures, guidelines, statements or anything similar that have been mentioned in this brochure are intended for ING internal purposes only, and under no circumstance should they be construed as creating any rights whatsoever to third parties. In assessing compliance with any of the policies and guidelines, the standards applied are subjective and any decision in relation thereto remains within ING's discretion. ING does not accept liability for whatever consequences may result from its not adhering to these policies, procedures, criteria, instructions, statements and guidelines. ING reserves the right to change, amend or withdraw policies, procedures, guidelines and statements at its discretion at any time and can, at its own discretion, decide to make available to third parties (details of) policies, procedures, guidelines, statements or anything similar that have been mentioned in this brochure. This brochure refers, by hyperlinks or other means to information provided by third parties. The reasonableness, accuracy or completeness of such information has not been verified by ING and links to other sites do not constitute ING's approval or endorsement of such sites or their products or advertisements. ING accepts no liability whatsoever in connection with any such information that has been or will be provided by third parties.

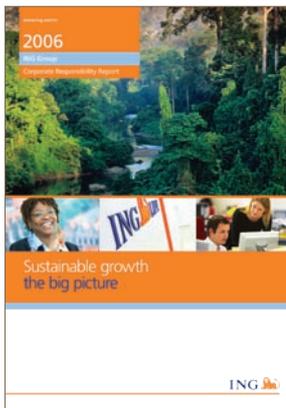
Text and production

ING Groep N.V., Corporate Communications,
Amsterdam

Design and production

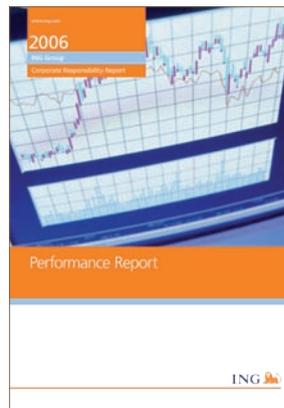
Addison Corporate Marketing, London

ING Corporate Responsibility Report 2006



The Big Picture

The Big Picture highlights corporate responsibility topics that were most important to our stakeholders and our businesses in 2006. Available in print and on www.ing.com/cr



Performance Report

The Performance Report gives detailed information on ING's performance in the field of Corporate Responsibility. Available as PDF on www.ing.com/cr

www.ing.com/cr