



ING Financial Economic Crime Statement – October 2023

I. Introduction

ING is committed to conduct its business with integrity, and in compliance with applicable laws, applicable regulations and relevant standards in each of the markets and jurisdictions in which ING operates.

As a globally active financial institution, ING is at risk of being (mis)used for purposes of money laundering (including predicate offences such as bribery, corruption, tax evasion, and/or fraud), terrorist financing and/or sanctioned activity (including prohibited involvement in transactions for, on behalf of or otherwise related to sanctioned persons, entities and/or countries, as well as prohibited activity in terms of trade controlled exports and/or proliferation financing). ING defines risks in these areas as Financial Economic Crime (FEC) risks.

II. The FEC Policy Framework

The ING FEC Policy framework stipulates the requirements that ING entities are required to adhere to, aimed to enable ING to the best of its ability to safeguard the bank, its customers and society against FEC risks.

The ING FEC Policy framework incorporates various requirements, stemming from (inter alia) the following different sources:

- EU directives and regulations in the area of prevention of money laundering and terrorist financing;
- the Dutch Anti-Money Laundering and Counter-Terrorist Financing Act (*Wwft*), implementing a variety of EU-based money laundering and terrorist financing rules into Dutch laws;
- international (EU, UN, US) and relevant local (e.g. UK) sanctions laws and regulations;
- the Dutch Sanctions Act 1977 (*Sw*) and the Dutch Regulation on Supervision of the Dutch Sanctions Act (*Regeling toezicht Sanctiewet 1977*); and
- relevant industry and market standards, such as the FATF Recommendations and the Wolfsberg Principles.

III. Scope and applicability

The ING FEC Policy framework is mandatory and applies to ING Groep N.V. and all majority-owned and/or controlled ING entities, including outsourcing partners to which ING entities have outsourced FEC-related activities. The scope is thus global.

Being subject to the ING FEC Policy framework, ING entities are required to implement appropriate local procedures that will enable them to in principle comply with ING's FEC Policy requirements under the ING FEC Policy framework as well as applicable local laws and regulations. Where such applicable local laws and regulations are more stringent than the ING FEC Policy requirements, the local laws and regulations prevail. Vice versa, the ING FEC Policy framework prevails when the standards therein are stricter than is stipulated in local laws and regulations, provided that such actions are not legally prohibited under applicable local laws (for example, due to local data privacy or bank secrecy restrictions).

IV. FEC risk control areas and key controls

The FEC requirements in the ING FEC Policy framework covers risk control areas related to

- Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF);
- Sanctions (including Export Trade Controls and Non-Proliferation Financing);
- Anti-Bribery and Corruption;
- Customer Tax Compliance.

For the purpose of fighting financial economic crime, the ING FEC Policy framework distinguishes, but is not limited to, the following pillars: (1) Customer Due Diligence (CDD) measures including a customer risk assessment, commensurate with the risks identified, (2) transaction monitoring to identify, assess and report suspicious activities, (3) screening for compliance with applicable Dutch, EU, US and UN sanctions programs, (4) training and awareness, and (5) reporting and record retention.

Key controls related to the above-mentioned pillars are included in ING's FEC control framework. Its effectiveness is tested and reviewed periodically.

ING continuously works to improve and enhance compliance risk management. More information on ING's progress can be found [here](#).

V. ING's designation of specific countries as Ultra High Risk (UHCs)

As a result of frequent evaluation of the business from an economic, strategic and risk-based perspectives, ING, with limited exception, does not engage in business involving certain countries including Cuba, Iran, North Korea, Sudan, Syria and the Crimea region. ING has a policy not to enter into new relationships with customers from these countries and processes are in place to discontinue existing relationships involving these countries and generally refuses to process any payments involving these countries or regions.

ING's policy generally prohibits relationships or transactions involving sanctioned persons and entities or comprehensively sanctioned countries, territories and their governments. It sometimes also means that ING risk appetite may be stricter than legal obligations, and we may choose not to support certain customer relationships, business activities and transactions even if permitted by law.

ING will continue to closely monitor the developments with respect to specific countries and will revisit the current policies and procedures if and when appropriate.

VI. More information

More information about managing FEC risks at ING can be found in ING's latest annual report, as well as on this [link](#), specifically regarding:

- Anti-Bribery and Corruption: [Zero tolerance approach to bribery and corruption | ING](#).
- Customer Tax Compliance: [Automatic Exchange of Information \(AEOI\) | ING](#).

ING's Wolfsberg Questionnaire (i.e. the Correspondent Banking Due Diligence Questionnaire) is available on the SWIFT KYC Registry.