

# **PRESS RELEASE**

Amsterdam, 8 December 2011

### ING Bank meets EBA capital exercise

- ING Bank meets the EBA capital exercise with a core Tier I ratio of 9.2% after taking into account the forthcoming CRD3 RWA's for market risk as well as sovereign debt at market prices based on September 2011 figures
- Two divestments have not been taken into account in the EBA capital exercise. The
  closing of the sale of ING Real Estate Investment Management in October 2011 and the
  announced sale of ING Direct USA will further improve the core Tier I ratio by 100 basis
  points. Taking these divestments into consideration, the pro forma core Tier I in this
  capital exercise is 10.2%.

ING Bank notes the announcements made today by the European Banking Authority (EBA) and De Nederlandsche Bank (DNB) regarding the capital exercise, which demonstrate the following result for ING Bank.

The capital exercise proposed by the EBA and agreed by the Council on 26 October 2011 requires banks to strengthen their capital positions by building up a temporary capital buffer against sovereign debt exposures to reflect current market prices. In addition, it requires them to establish a buffer such that the Core Tier 1 capital ratio reaches a level of 9% by the end of June 2012.

71 banks across Europe, including ING Bank, were subject to the capital exercise whose objective is to create an exceptional and temporary capital buffer to address current market concerns over sovereign risk and other residual credit risk related to the current difficult market environment. This buffer would explicitly not be designed to cover losses in sovereigns but to provide a reassurance to markets about banks' ability to withstand a range of shocks and still maintain adequate capital.

Following completion of the capital exercise conducted by the EBA, in close cooperation with DNB, the exercise has determined that:

ING Bank meets the 9% Core Tier 1 ratio after the removal of the prudential filters on sovereign assets in the Available-for-Sale portfolio and prudent valuation of sovereign debt in the Held-to-Maturity and Loans and receivables portfolios, reflecting current market prices.

The methodology underlying the capital exercise was outlined by the EBA prior to its announcement to ensure consistency across all banks in the EU banking system involved in the exercise.

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#### **ING PROFILE**

ING is a global financial institution of Dutch origin, offering banking, investments, life insurance and retirement services to meet the needs of a broad customer base. Going forward, we will concentrate on our position as an international retail, direct and commercial bank, while creating an optimal base for an independent future for our insurance and investment management operations

#### **IMPORTANT LEGAL INFORMATION**

Certain of the statements contained herein are not historical facts, including, without limitation, certain statements made of future expectations and other forward-looking statements that are based on management's current views and assumptions and involve known and unknown risks and uncertainties that could cause actual results, performance or events to differ materially from those expressed or implied in such statements. Actual results, performance or events may differ materially from those in such statements due to, without limitation: (1) changes in general economic conditions, in particular economic conditions in ING's core markets, (2) changes in performance of financial markets, including developing markets, (3) the implementation of ING's restructuring plan to separate banking and insurance operations, (4) changes in the availability of, and costs associated with, sources of liquidity such as interbank funding, as well as conditions in the credit markets generally, including changes in borrower and counterparty creditworthiness, (5) the frequency and severity of insured loss events, (6) changes affecting mortality and morbidity levels and trends, (7) changes affecting persistency levels, (8) changes affecting interest rate levels, (9) changes affecting currency exchange rates, (10) changes in general competitive factors, (11) changes in laws and regulations, (12) changes in the policies of governments and/or regulatory authorities, (13) conclusions with regard to purchase accounting assumptions and methodologies, (14) changes in ownership that could affect the future availability to us of net operating loss, net capital and built-in loss carry forwards, and (15) ING's ability to achieve projected operational synergies. ING assumes no obligation to publicly update or revise any forward-looking statements, whether as a result of new information or for any other reason. This document, and any other document or presentation to which it refers, do not constitute an offer to sell, or a solicitation of an offer to buy, any securities.

# Composition of capital as of 30 September 2011 (CRD3 rules)

ING BANK NV Name of the bank: NL047

Septer	mber 2011	Deferences to CODED reporting
Million EUR	% RWA	References to COREP reporting
31.736		COREP CA 1.1 - hybrid instruments and government support measures other than
·		ordinary shares
		COREP CA 1.1.1 + COREP line 1.1.2.1
		Net amount included in T1 own funds (COREP line 1.1.5.1)
		Prudential filters for regulatory capital (COREP line 1.1.2.6.06)
-1,056		COREP CA 1.3.T1* (negative amount)
-429		Total of items as defined by Article 57 (I), (m), (n) (o) and (p) of Directive 2006/48/EC and deducted from original own funds (COREP lines from 1.3.1 to 1.3.5 included in line 1.3.T1*)
-3		COREP line 1.3.7 included in line 1.3.T1* (50% securitisation exposures in the banking and trading book subject to 1250% risk weight; Art. 57 (r) of Directive 2006/48/EC)
-625		As defined by Article 57 (q) of Directive 2006/48/EC (COREP line 1.3.8 included in 1.3.T1*)
30,680	9.21%	
0		Paid up ordinary shares subscribed by government
0		
30,680	9.21%	Common equity + Existing government support measures included in T1 other than ordinary shares
0	0.00%	9%RWA-Core Tier 1 including existing government support measures; if >0.
8,398		Net amount included in T1 own funds (COREP line 1.1.4.1a + COREP lines from 1.1.2.2***01 to 1.1.2.2***05 + COREP line 1.1.5.2a (negative amount)) not subscribed by government
39,078	11.73%	COREP CA 1.4 = COREP CA 1.1 + COREP CA 1.3.T1* (negative amount)
333,112		
13,156		
-607		Please report the prudential filter as a positive number if the AFS revaluation reserve for sovereign assets is negative. Please report the prudetnial filter as a negative number if the AFS revaluation reserve is positive. If the bank does not apply a prudential filter on AFS sovereign assets, please fill in zero.
-10		Difference between the book value and the fair value at the reference date. Please provide a positive number if the book value is larger than the fair value of sovereign assets. Please provide a negative number if the book value is smaller than the fair value of the sovereign assets.
0	0.00%	Sum of Prudential filter and valuation. If negative it is set to 0
0	0.00%	9%RWA-(Core Tier 1 including existing government support measures-Sovereign
	Million EUR  31,736  29,379  -1,402  -267  -1,056  -429  -3  -625  30,680  0  30,680  0  8,398  39,078  333,112  13,156	31,736 29,379 -1,402 -267 -1,056 -429  -3 -625 30,680 9.21% 0 0 30,680 9.21% 0 0.00%  8,398 39,078 333,112 13,156  -607  -10

(1) The amount is already included in the computation of the eligible capital and reserves and it is provided separately for information purposes.

(2) According with CRD3 it can include also 50% securitisation exposures in the trading book subject to 1250% risk weight and not included in RWA.

(3) It includes also possible differences between the book value and the fair value of: i) direct sovereign exposures in derivatives; ii) indirect sovereign exposures in the banking and trading book

turity			value gross of provisions) (1)		nd write-off exposures (I	CT POSITIONS long) net of cash short po nere there is maturity mat	esition of sovereign debt	DIRECT SOVEREIGN EXPOSURES IN DERIVATIVES (1)	INDIRECT SOVEREIGN EXPOSURES (3) (on and off balance sheet)	<u>Memo Item</u>	Provisions and write-off on		Reserve AFS sovereign assets	Fair value of Cash flow and fair value
Residual Ma	Country		of which: loans and advances in the HTM and Loans and receivables portfolios		of which: Available for sale financial assets (AFS)	of which: Financial assets designated at fair value through profit or loss (FVO)	of which: Financial assets held for trading <sup>(2)</sup>	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Nominal Value  Debt securities in HTM and Loans and Receivables portfolios	Sovereign assets (loans, advances and debt securities) (+)	(including the fair value of Cash flow and fair value hedging contracts)  (+/-) (4)	(gross the fair value of Cash flow and fair value hedging contracts) (+/-) (4)	hedging contracts on AFS sovereign assets (+/-) (4)
3M 1Y 2Y		0 6 3	0 0 0	0 6 3	0 0 0	0 0 0	0 6 3	0 0 0 0	0 0 0	0 0 0 0		0 0 0 0	0 0 0	0 0 0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot	Austria	3 171 895 71 1,149	0 0 0 0	2 171 880 -50 1,011	0 110 777 0 887	0 0 0 0	2 60 104 -50 124	0 0 0 0	0 0 0 0	0 0 0 0	0	0 -26 0 -25	0 38 0 38	0 -13 0 -13
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot	Doloi: um	92 1,635 2,300 2,108	23 579 103 130	73 1,519 2,299 2,075	0 1,045 2,100 1,530	0 0 0 0	50 -106 97 414	0 7 3 2	0 0 0 0 -11	0 0 0 0		0 -23 -65 -16	0 23 65 28	0 0 0 0 -12
	Belgium	2,434 3,822 910 13,302	129 99 526 1,590	2,313 3,763 438 12,481	1,889 3,426 214 10,204	0 0 0 0	244 238 -302 634	15 48 128 202	8 0 0 -3	52 0 0 52	0	-32 -51 -8 -194	32 72 16 235	0 -21 -8 -41
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot	Bulgaria	0 32 0 17	0 0 0 0	0 32 0 17	0 0 0 0	0 0 0 0	0 32 0 17	0 0 0 0	0 0 0 0	0 0 0 0		0 0 0 0	0 0 0 0	0 0 0 0
		0 4 0 52	0 0 0 0	0 4 0 52 0	0 0 0 0	0 0 0	4 0 52 0	0 0 0 0	0 0 0	0 0 0 0	0	0 0 0 0	0 0 0 0	0 0 0 0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot	Cyprus	0 0 19 0	0 0 0 0	0 0 19 0	0 0 19 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0		0 0 3 0	0 0 -3 0	0 0 0 0
10Y 15Y Tot 3M 1Y		0 0 19 81	0 0 0	0 0 19 81	0 0 19 81	0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	0	0 0 3 0	-3 0	0 0 0 0
1Y 2Y 3Y 5Y 10Y 15Y Tot	Czech Republic	44 0 0 0 0 528	0 0 0 0	44 0 -3 -2 526	44 0 0 0 0 526	0 0 0 0	0 0 -3 -2	0 0 0 0	14 -15 0 0	0 0 0 0		0 0 0 0 2	0 0 0 0 -2	0 0 0 0
		0 653 0	0 0 0	0 648 -1 0	0 651 0	0 0 0	-3 -1 0	0 0 0 0	0 -1 0 0	0 0 0	0	0 2 0 0	0 -2 0 0	0 0 0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot	Denmark	0 0 0 0	0 0 0 0	0 0 -1 0	0 0 0 0	0 0 0 0	0 0 -1 0	0 0 0 0	0 0 0 0	0 0 0 0		0 0 0 0	0 0 0 0	0 0 0 0
		0 0 0 0	0 0 0 0	0 -2 0 0	0 0 0 0	0 0 0 0	0 -2 0 0	0 0 0 0	0 0 0 0 0 8	0 0 0 0	0	0 0 0 0	0 0 0 0	0 0 0 0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot	Estonia	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	-8 0 0	0 0 0 0		0 0 0 0	0 0 0 0	0 0 0 0
3M 1Y 2Y		0 0 5 2	0 0 0	0 0 5 -2	0 0 0 0	0 0 0 0	0 0 5 -2	0 0 0 0	0 0 0 0	0 0 0 0	0	0 0 0 0	0 0 0 0	0 0 0
3Y 5Y 10Y 15Y Tot	Finland	4 227 469 259 966	0 0 0 0	1 226 415 259 904	0 211 32 0 244	0 0 0 0	1 15 383 259 661	0 0 0 0	0 0 0 0	0 0 0 0	0	0 -1 0 0 -1	0 1 0 0	0 0 0 0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot	Faces	517 1,952 245 485	0 0 0 0	501 1,928 240 462	115 1,906 175 472	0 0 0 0	386 22 65 -10	0 0 0 0	0 19 0 0	0 0 0 0		0 -37 -7 -10	0 37 7 27	0 0 0 -17
5Y 10Y 15Y Tot	France	1,051 3,363 1,197 8,811	8 0 0 9	906 3,108 1,039 8,184	1,037 3,261 936 7,903	0 0 0 0	-139 -153 103 273	0 0 0 0	-26 0 0 -7	0 0 0	0	-17 -216 26 -260	64 268 132 534	-47 -51 -159 -274

	GROSS DIRECT LONG E			and write-off exposures (I	CT POSITIONS long) net of cash short po nere there is maturity mat		DIRECT SOVEREIGN EXPOSURES IN DERIVATIVES (1)	EXPOSURES IN EXPOSURES (3)		Provisions and write-off on		Reserve AFS sovereign assets	Fair value of Cash flow and fair value
Country		of which: <u>loans and</u> <u>advances</u> in the HTM and Loans and receivables portfolios		of which: Available for sale financial assets (AFS)	of which: Financial assets designated at fair value through profit or loss (FVO)	of which: Financial assets held for trading <sup>(2)</sup>	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Nominal Value  Debt securities in HTM and Loans and Receivables portfolios	Sovereign assets (loans, advances and debt securities) (+)	(including the fair value of Cash flow and fair value hedging contracts)  (+/-) (4)	(gross the fair value of Cash flow and fair value hedging contracts)  (+/-) (4)	hedging contracts on AFS sovereign assets (+/-) (4)
1	1,453	1,417	1,414	0	0	-4	0	0	0		0	0	0
Germany Y tt	930	449	533	0	0	-347	-5 9	0 878	431 100		0 -28	0 71	0 -43
Germany	2,401 1,429	309	2,289 1,307	1,978 1,308	0	-98 -2	0	0	0		-36	66	-30
v Germany	577 6,968	1 2,562	35 6,465	376 4,175	0	-342 -272	-43 -69	-541 -543	0		-3 -247	3 291	-44
	1,805 15,563	0	1,581	478	0	1,103	-82	27	0		-22	47	-25
t	15,563 0	4,738	13,625 0	8,315 0	0	40 0	-189 0	-179 0	531 0	0	-336 0	478 0	-142 0
Greece (5)	10	0	10	10	0	0	0	0	0		0	0	0
- (5)	190 33	0	190 33	190 33	0	0	0	0	0		0	0	0
Greece (5)	261	0	261	261	0	0	0	0	0		0	0	0
-	0 240	0	0 240	0 240	0	0	0	0	0		0	0	0
	735	0	735	735	0	0	0	<u>0</u> 4	0	0	0	0	0
Hungary	1,170 146	0	1,170 146	0	0	1,170 146	0	0	0		0	0	0
_	264	125	264	0	0	15	0 -18	-12 -1	125 0		0	0	0
	7	0	2	0	0	2	0	7	0		0	0	0
7	4	0	4 0	0	0	4	0	-4 0	0		0	0	0
	1,596	125	1,588	Ŏ	ŏ	0 1,338	-18	<u>-6</u>	125	0	0	0	0
	0	0	0	0	0	0	0	0	0		0	0	0
1	0	0	0	0	0	0	0	0	0		0	0	0
Iceland	0	0	0	0	0	0	0	0	0		0	0	0
lceland	0	0	0	0	0	0	0	0	0		0	0	0
	0	0	0	0	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0		0	0	0
	1	0	0	0	0	0	1	0	0		0	0	0
Ireland	0	0	0	0	0	0 -1	0 4	0	0		0	0	0
Ireland	1	0	1	0	0	1	0	0	0		0	0	0
	0 2	0	0	0	0	0	6	0	0	0	0	0	0
	555	85	544	1	0	457	0	1	0		0	0	0
-	110 106	10 24	33 73	0	0	23 49	0	37 -11	0		0	0	0
Italy	391	122	329	189	0	18	0	9 -15	0		1 7	-1 -7	0
	691 947	28 20	467 575	441 602	0	-3 -47	37	-11	0		66	-66	0
7 : 1	711 3,511	15 305	402 2,424	394 1,627	0	-7 492	0 41	0 10	0	0	4 79	17 -58	-21 -21
	0	0	0	0	0	0	0	0	0		0	0	0
]	0	0	0	0	0	0	0	0	0		0	0	0
Latvia	0	0	0	0	0	0	0	0	0		0	0	0
-	0	0	0	0	0	0	0	0	0		0	0	0
7	0	0	0	0	0	0	0	0	0	0	0	0	0
-	0	0	0	0	0	0	0	0	0		0	0	0
1	0	0	0	0	0	0	0	0	0		0	0 0	0 0
Liechtenstein	0	0	0	0	0	0	0	0	0		0	0	0
Liechtenstein	0	0	0	0	0	0	0	0	0		0	0	0
<del>7</del> :-	0	0	0	0	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	U	0	0	0
	2	0	2	0	0	2	0	0	0		0	0	0
l ithiconia	<u> </u>	0	6	0	0	0 6	0	0	0		0	0	0
Lithuania	3	0	1	0	0	1	0	-4 0	0		0	0	0
<b>7</b>	0	0	0	0	0	0	0	0	0		0	0	0
<u>t</u>	11	0	9	0	0	9	0	<del>-4</del> 0	0	0	0	0	0
	147	147	147	0	0	0	0	Ö	0		0	Ö	Ö
	1 8	0	1 8	0 7	0	0	0	0 0	0		0	0 0	0 0
Luxembourg	3	3	3	0	0	0	0	0	0		0	0	0
<b>/</b>	0	0	0	0	0 0	0	0	0	0		0	0	0
:	159	151	159	7	0	Ŏ	0	0	0	0	0	0	0

turity		GROSS DIRECT LONG EX			NET DIRECT POSITIONS gross of provisions and write-off exposures (long) net of cash short position of sovereign debt to other counterparties only where there is maturity matching) (1)				INDIRECT SOVEREIGN  EXPOSURES (3)  (on and off balance sheet)	<u>Memo Item</u>	Provisions and write-off on	Prudential filter AFS sovereign assets		Fair value of Cash flow and fair value
Residual Ma	Country		of which: <u>loans and</u> <u>advances</u> in the HTM and Loans and receivables portfolios		of which: Available for sale financial assets (AFS)	of which: Financial assets designated at fair value through profit or loss (FVO)	of which: Financial assets held for trading <sup>(2)</sup>	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Nominal Value  Debt securities in HTM and Loans and Receivables portfolios	Coversion assets	value of Cash flow and	(gross the fair value of Cash flow and fair value hedging contracts)  (+/-) (4)	hedging contracts on AFS sovereign assets (+/-) (4)
3M		0	0	0	0	0	0	0	0	0		0	0	0
1Y 2Y		0	0	0	0	0	0	0	0	0		0	0	0
3Y 5Y	Malta	0	0	0	0	0 0	0	0	0	0		0	0	0
10Y 15Y		0	0	0	0	0	0	0	0	0		0	0	0
Tot 3M		0 138	0 75	0 -177	0	0	0 -252	0 -29	0 20	0	0	0	0	0
1Y		2,433 1,719	89 207	2,433 1,470	1,131	0	1,213	97 -17	-95 51	0		-22 -42	22 57	0 -16
3Y	Netherlands	311	16	-472	1,496 271	0	-232 -759	530 649	-7	0		-5 -7	15	-10
5Y 10Y		2,128 3,161	30 277	1,692 2,604	255 2,600	0	1,408 -272	-431	-2 0	0		-7 -72	122	-50
Tot		9,314 19,204	9,308 10,002	8,432 15,984	0 5,753	0	-875 230	-1,669 -870	-33	0	0	-147	223	-76
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot 3M 1Y 2Y 3Y 5Y Tot 3M 1Y 2Y 3Y 5Y		0	0	0	0	0	0	0	0	0		0	0	0
2Y 3Y	M.	0	0	0	0	0	0	0	0	0		0	0	0
5Y	Norway	0	0	0	0	0	0	0	0	0		0	0	0
5Y 10Y 15Y Tot		0	0	0	0	0	0	0	0	0	0	0	0	0
3M		46	13	45	0	0	32	0	-7 -8	0		0	0	0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot		341 540	5 18	339 514	327 514	0	4 -26	0	18	8		-5	5	0
3Y 5Y	Poland	94 1,776	52 178	94 1,772	12 1,542	0	19 11	0	-17 0	12 41		-3	4	-1
10Y 15Y		1,556 406	867 285	1,522 406	601 105	0	6 17	0	0	48 0		13	-13 0	-1 0
Tot 3M		4,758 0	1,418 0	4,691 0	3,100 0	0	62 0	0	0	112 0	0	6 0	<del>-4</del> 0	<del>-2</del> 0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot		0	0	0	0	0	0	0	0	0		0	0	0
3Y	Portugal	0 361	0	0 361	0 360	0	0	0	0	0		0 75	0 -75	0
10Y		273	0	273	273	0	1	0	0	0		67	-67 0	0
Tot		636	0	636	633	0	3	0	0	0	0	142	-142 0	0
3M 1Y		23 85	6 0	23 85	0	0	17 85	0	-10 0	0		0	0	0
2Y 3Y	Romania	23 7	0	23 7	0	0	23 7	0	7	0		0	0	0
5Y 10Y	Nomania	0	0	0	0	0	0	0	0	0		0	0	0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot		0 137	0 6	0 137	0	0	0 131	0	0 -3	0	0	0	0	0
3M 1Y		36 29	0	36 29	0	0	36 29	0	0	0		0	0	0
2Y 3V		67 0	0	67 0	0	0	67 0	0	4 -6	0		0	0	0
5Y	Slovakia	0	0	0	0	0	0	0	3	0		0	0	0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot		0 0 133	0	0 133	0	0	0 0 133	0	0	0	0	0	0	0
3M 1Y		0	0	0	0	0	0	0	0	0		0	0	0
1Y 2Y		0	0	0	0	0	0	0	0	0		0	0	0
3Y 5Y	Slovenia	0	0 0	-2 1	0	0	- <u>2</u> 1	0	0	0		0	0	0
2Y 3Y 5Y 10Y 15Y Tot		26 51	0	-16 51	0	0	-16 51	0	0	0		0 0	0	0
Tot 3M		77 58	0 1	33 58	0	0	33 56	0	0 19	0	0	0	0 0	0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot		306 21	146 0	303 11	30 18	0	6 -7	0	0	121 0		0	0	0
3Y	Spain	141 39	50 0	115	20	0	-7 -5 -12	0 0	0	50		-1 1	1 -1	0
10Y		73	25	67	47	0	-5	0 0	-10 0	0		5 119	-5 -34	0 -85
Tot		554 1,192	0 222	554 1,107	553 678	0	2 36	0	9	171	0	119	-40	-85
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot		0	0	0	0	0	0	0	0	0		0	0	0
2Y 3Y	Sweden	0	0 0	0	0	0	0	0	0	0		0	0	0
5Y 10Y	SWEUEII	0	0	0	0	0	0	0	0	0		0	0	0
15Y Tot		0	0	0	0	0	0	0	0	0	0	0	0	0

iturity		GROSS DIRECT LONG EXPOSURES (accounting value gross of provisions) (1)		NET DIRECT POSITIONS  (gross of provisions and write-off exposures (long) net of cash short position of sovereign debt to other counterparties only where there is maturity matching) (1)			DIRECT SOVEREIGN EXPOSURES IN DERIVATIVES <sup>(1)</sup>	INDIRECT SOVEREIGN  EXPOSURES (3)  (on and off balance sheet)  Memo Item		Provisions and write-off on	Prudential filter AFS sovereign assets	•	Fair value of Cash flow and fair value	
Residual Ma	Country		of which: <u>loans and</u> <u>advances</u> in the HTM and Loans and receivables portfolios		of which: Available for sale financial assets (AFS)	of which: Financial assets designated at fair value through profit or loss (FVO)		Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Net position at fair values (Derivatives with positive fair value + Derivatives with negative fair value)	Nominal Value <u>Debt securities</u> in HTM and Loans and Receivables portfolios		I I I I VAIUE NECOING	(gross the fair value of Cash flow and fair value hedging contracts)  (+/-) (4)	hedging contracts on AFS sovereign assets (+/-) (4)
3M		1	1	1	0	0	0	0	0	0		0	0	0
1Y		8	8	8	0	0	0	0	0	0		0	0	0
2Y		19	19	19	0	0	0	0	0	0		0	0	0
3Y	United Kingdom	27	27	27	0	0	0	0	0	0		0	0	0
5Y	O'mtou'r tin iguoini	38	38	38	0	0	0	0	0	0		0	0	0
3M 1Y 2Y 3Y 5Y 10Y 15Y Tot		1	1	-6	0	0	-7	0	0	0		0	0	0
15Y		3	3	3	0	0	0	U	U	0	0	U	U	0
100		91	91	90	U	U	-/	U	U	U	U	U	U	0
[	TOTAL EEA 30	72,762	18,663	64,649	40,756	0	4,241	-829	-214	990	0	-607	1,261	-654

### Notes and definitions

- (1) The exposures reported cover only exposures to central, regional and local governments on immediate borrower basis, and do not include exposures to other counterparts with full or partial government guarantees
   (2) The banks disclose the exposures in the "Financial assets held for trading" portfolio after offsetting the cash short positions having the same maturities.
   (3) The exposures reported include the positions towards counterparts (other than sovereign) on sovereign credit risk (i.e. CDS, financial guarantees) booked in all the accounting portfolio (on-off balance sheet). Irrespective of the denomination and or
- accounting classification of the positions the economic substance over the form must be used as a criteria for the identification of the exposures to be included in this column. This item does not include exposures to counterparts (other than sovereign) with full or partial government guarantees by central, regional and local governments
- (4) According with CEBS Guidelines on prudential filters it is required a consistent treatment of gains and losses resulting from a transaction whereby a cash flow hedge is created for an available for sale instrument: i.e. if the gains on the hedged item are recognised in additional own funds, so should the results of the corresponding cash flow hedging derivative. Moreover if fair-value hedging contracts on sovereign assets are taken in consideration for the computation of the prudential filters (before their removal), the FV of such contracts must be reported in the column AB.
- (5) Please report gross and net direct positions before eventual write-off (PSI); in the column provisions must be included eventual write-off (PSI).

## Composition of RWA as of 30 September 2011

Name of the bank: NL047 ING BANK NV

### (in million Euro)

	Rules at the end of September	CRD 3 rules
Total RWA (1)	319,956	333,112
RWA for credit risk	279,677	279,677
RWA Securitisation and re-securitisations	21,158	21,158
RWA Other credit risk	258,519	258,519
RWA for market risk	4,830	17,986
RWA operational risk	35,449	35,449
Transitional floors (2)	-	-
RWA Other	-	-

#### **Notes and definitions**

(1) The RWA calculated according to CRD III can be based on models that have not yet been approved by the National Supervisory Authority.

(2) All IRB/AMA banks in the exercise have applied transitional floor which assess the impact 80% of the Basel 1 requirements. However, wide divergences in national approaches to the floors means that two main approaches have been identified as set out in the methodological note. The transitional floor has been applied according to the following approach:

option 2

Name of the bank: NL047 ING BANK NV

	Credit default swaps (CI	OS) and other contracts (1)
	Bank is protection seller	Bank is protection buyer
Country (2)	Notional amount	Notional amounts
	outstanding	outstanding
	(3)	(3)
Austria	5	5
Belgium	54	57
Bulgaria	51	58
Cyprus	-	ı
Czech Republic	41	42
Denmark	4	4
Estonia	12	12
Finland	-	-
France	163	171
Germany	22	22
Greece	-	-
Hungary	155	160
Iceland	-	-
Ireland	1	1
Italy	119	86
Latvia	-	-
Liechtenstein	-	-
Lithuania	9	13
Luxembourg	-	-
Malta	-	-
Netherlands	-	-
Norway	-	-
Poland	95	94
Portugal	2	2
Romania	47	50
Slovakia	73	72
Slovenia	4	4
Spain	168	159
Sweden	5	5
United Kingdom	-	-

<sup>(1)</sup> It includes credit derivatives and other credit risk transfer contracts/instruments that irrespective of the denomination respresent indirect exposures (as protection seller/buyer) on sovereign risk (reference entity)

<sup>(2)</sup> The country identifies the reference entity single name of the CDS and other contracts.

<sup>(3)</sup> Notional amounts outstanding: Nominal or notional amounts outstanding are defined as the gross nominal or notional value of all contracts concluded and not yet settled on the reporting date. For contracts with variable nominal or notional principal amounts, the basis for reporting is the nominal or notional principal amounts at the time of reporting.