

## Particulars

### About Your Organisation

#### 1.1 Member Name

ING Bank N.V.

#### 1.2 Membership Number

5-0019-15-000-00

#### 1.3 Membership Sector

Banks and Investors

#### 1.4 Membership Category

Ordinary

#### 1.5 Country

Netherlands

#### 2.0 Does your company or organisation produce, process, consume or sell any palm oil or any products containing derivatives of palm oil?

No

#### 2.2 Please select all the sectors that best describe the business activities of your company or organisation, including your primary RSPO membership sector. You may select multiple sectors and will be required to complete the ACOP form for the relevant sectors

- I am a bank or financial institution that finances or supports companies or organisations that produce or manufacture palm oil, palm kernel oil or related products
- I am a conservation and environmental NGO supporting the sustainable development of the palm oil industry
- I am a social and human development NGO supporting the sustainable development of the palm oil industry
- I am an Affiliate member of the RSPO, indirectly involved in the palm oil industry

## Bank & Investors

### 1. Operational Profile

**1.1 Please state your company's main activity(ies) within palm oil-related financing. Please select all applicable option(s).**

- Corporate / Commercial Banking
- Trade Finance
- Private Banking
- Investment / Equity
- Debt / Capital Market
- Other

Other

-

### 2. Operations in Palm Oil

**2.1 What types of financial services does your company provide to the palm oil industry?**

- Trade Solutions
- Lending/Loans
- Leasing
- Treasury Products
- Cash Management Products
- Investments
- Insurance
- Other

Other

-

**2.2 For your company's palm oil-related activities, which geographic region(s) do you operate in?**

- Worldwide
- Africa
- Europe
- North America
- South America
- Middle East
- China
- India
- Indonesia
- Malaysia
- Oceania
- Rest of Asia

### 3. Palm Oil Policy and Progress

#### 3.1 Does your company have a lending or investment policy on palm oil?

Yes

---

#### 3.2 Which supply chain sectors does your palm oil policy cover?

- Growers
- Traders
- Processors
- Consumer Goods Manufacturers
- Retailers
- Others

Others

---

-

#### 3.3 Does your policy on palm oil make a specific reference to RSPO-certified sustainable palm oil and oil palm products, and/or RSPO certification?

Yes

---

#### 3.4 Does your company have a policy that requires all your palm oil clients to be RSPO members?

Yes

---

#### 3.5 Does your company require your clients to have a public TimeBound Plan for 100% RSPO certification or uptake?

Yes

---

#### 3.6 When do you expect to require all your Grower clients to be RSPO certified?

2026

---

#### 3.7 When do you expect to require your clients in all other sectors to be RSPO certified?

2030

---

**3.8 Which regions do the above commitments cover?**

- Worldwide
- Africa
- Europe
- North America
- South America
- Middle East
- China
- India
- Indonesia
- Malaysia
- Oceania
- Rest of Asia

**3.9 What measures do you take if a client is not meeting the requirements of your policy on palm oil?**

ING applies its Environmental Social Risk (ESR) policy framework to its business engagements. One policy in the ESR framework is the Sector Policy for Forestry and Agrocommodities, which applies to all products and services offered by ING to entities in scope of our Framework that are operating in the forestry and agrocommodities sector, including palm oil. 1) Business engagements in the palm oil sector will require production companies owning, operating or managing plantations/crushing mills to either be an RSPO member or in the process of becoming a member, and to commit to certify their operations RSPO in a time-bound plan. If a company owns, operates or manages palm oil plantations/mills which do not comply with the RSPO certification, then ING engages the company on the reasons for such noncompliance. Afterwards, we require the company to have a time-bound plan to achieve RSPO certification for all the plantations under its operational control. We will then assess the client's commitment and progress towards full RSPO certification. Furthermore, 1) Companies must commit to have and apply their NDPE policy and procedures. 2) Traders are required to be or become RSPO members as well within an agreed timeline, and to commit to increasing trading RSPO certified palm oil as much as possible. 3) ING promotes the use of best practices with its clients. ING also promotes RSPO certification with companies that buy or trade palm oil products, but do not own, operate or manage palm oil plantations. For such companies ING promotes RSPO membership, but we do not require it.

**3.10 Do you proactively engage with your clients to support and join the RSPO?**

Yes

**3.11 Did members of your company participate in RSPO working groups and/or taskforces during the reporting period?**

Yes

**3.12 Does your company have any collaborations with public or private sector palm oil industry players to support them in their efforts to increase the production or consumption of certified sustainable palm oil (CSPO)?**

Yes

**3.13 What other activities have your company undertaken to promote RSPO-certified sustainable palm oil and oil palm products during the reporting period?**

Client engagement ING risk and front office departments engage clients in the palm oil sector and discuss relevant topics, when necessary. We discuss how we can support clients in realizing their RSPO certification objectives and solve potential environmental or social issues affecting their operations. Financial Institution Consultation Group Force (FICG). ING is a member of the FICG of the RSPO where Financial Institutions share sector knowledge and provide feedback on market developments, trends and tools. The FICG also does outreach to local regional operating banks and hosts consultants that share advancements related to tools to manage and assess Environmental and Social risks in the palm oil supply chain.

#### 4. Actions for Next Reporting Period

##### 4.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

- Participation in RSPO Working Group or Task Forces
- Support Independent Smallholders (ISH)
- Contribute to the RSPO Smallholder Trainer Academy
- Financial contribution to the RSPO Smallholder Support Fund
- Direct investments in Smallholder Certification projects
- Involvement/direct investments in Jurisdictional/Landscape approach
- Direct/collective investments in conservation and restoration initiatives
- Financial contribution to support members with Remediation and Compensation (RaCP) process, direct/collective investments in conservation and restoration initiatives
- Allocating FTE to promote the production or consumption of certified sustainable oil palm products
- Specific policies and action plans by the member to promote CSPO production or consumption in the upstream or downstream supply chain, including target dates or broader policies that include such efforts
- No activities planned
- Others

Other

ING will continue to support the objectives of the RSPO by promoting RSPO membership and certification amongst the palm oil actors in the supply chain, in line with the requirements included in our ESR Framework. ING has a restrictive policy on onboarding new palm oil clients.

---

## Shared Responsibility

*The Board of Governors of the Roundtable on Sustainable Palm Oil approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility (SR) requirements will be done through ACOP and MyRSPO. As the process of verification of the reports is in development, the Shared Responsibility section in ACOP may change in future ACOP cycles. Evidence to show compliance to the SR requirements shall be uploaded via your membership profile in MyRSPO. Please login to your MyRSPO account and upload the relevant policies, plans and relevant reports there. If you do not have a policy or your policy does not cover all items, you will be required to provide a Declaration of Support for the relevant policy items in your MyRSPO profile. Additional information on the required policies and plans applicable to all sectors as well as the annual uptake targets for supply chain actors can be found on <https://rspo.org/members/shared-responsibility> or email the Shared Responsibility team at [sharedresponsibility@rspo.org](mailto:sharedresponsibility@rspo.org).*

### SR 1. Transparency

**1.1 Does your organisation have organisational management documents publicly-available?**

Yes

---

### SR 2. Ethical Conduct

**1.2 Does your organisation have a publicly-available policy covering Ethical Conduct, including for recruitment and contractors?**

Yes

---

### SR 3 and SR 4. Legal Compliance

**1.3 Does your organisation comply with all applicable legal requirements?**

Yes

---

**1.4 Does your organisation require its third party contractors to comply with legal requirements?**

Yes

---

### SR 7. Claims and labels

**1.7b Does your organisation promote preferential incentives to support use of off-product RSPO claims and labels?**

No

---

### SR 8. Information and outreach activities

**1.8 Does your organisation implement transparent communication and outreach activities to promote sustainable palm oil?**

No

---

### SR 9. Human Rights

**1.9 Does your organisation have a publicly-available Policy on respect for human rights, including for suppliers and sub-contractors?**

Yes

---

**SR 10. Complaints & Grievances****1.10 Does your organisation have a Grievance Mechanism that is accessible to all affected parties?**

Yes

**1.10.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System?**

Yes

**SR 11 and SR 12. Land Use and FPIC****1.11b Does your organisation have a policy covering Commitment to respect Free Prior and Informed Consent (FPIC) in the financing for PO sector.**

Yes

**1.11b.1 Does your organisation have a procedure in place to identify legal, customary or user rights, and people entitled to compensation?**

Yes

**SR 13 and SR 14. Smallholders inclusion****1.13 Does your organisation support oil palm smallholders (groups)?**

No

**SR 15 - SR 20. Labour & Labour Rights****1.15 Does your organisation have a publicly-available policy covering Labour & Labour Rights?**

Yes

**1.15.1 Does the policy cover:**

- No discrimination and equal opportunities
- Pay and conditions of the workers.
- Freedom of association and Collective bargaining
- Protection of children and remediation for suppliers and third party contractors.
- Prevention of all forms of harassment, including sexual harassment
- No forced or trafficked labour

**SR 21. Occupational Health & Safety****1.21 Does your organisation have a publicly-available Policy covering Occupational Health & Safety?**

Yes \_\_\_\_\_

**SR 22. Waste Management****1.22b Does your organisation have a statement of intent to reduce, recycle, reuse and disposal based on the hazardous characteristics?**

Yes \_\_\_\_\_

**SR 25. Climate Change and Greenhouse Gases (GHG)****1.25 Does your organisation have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG) including identification and assessment of GHG emissions and implementation of a plan to reduce or minimise them?**

Yes \_\_\_\_\_



**SR 26. Promotion of certification/uptake**

**1.26a Does your organisation provide preferential rates/investments/loans for certified organisations and/or organisation with progressive TBP either for certification or uptake of certified products?**

No

---

**SR 27. Sustainable Palm Oil Policy**

**1.27a Does your organisation have other relevant policies as a sustainable palm oil sourcing policy?**

Yes

---

**SR 28 and SR 29. Support and resourcing**

**1.28 Does your organisation provides services and support to RSPO and resources to implement SR?**

Yes

---

## Challenges and Support

### 1.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?

- Awareness of RSPO in the market
- Difficulties in the certification process
- Certification of smallholders
- Competition with non-RSPO members
- High costs in achieving or adhering to certification
- Human rights issues
- Insufficient demand for RSPO-certified palm oil
- Low usage of palm oil
- Reputation of palm oil in the market
- Reputation of RSPO in the market
- Supply issues
- Traceability issues
- No challenges faced
- Others

Others

To manage the perception of a large number of ING's stakeholders that little global progress is observed in terms of RSPO certification of plantations/operations whilst we continue to support our own clients which certification progress ING actively monitors. Insufficient demand for RSPO-certified oil is clearly a challenge for all involved parties.

### 1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?

- Communication and/or engagement to transform the negative perception of palm oil
- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- Engagement with peers and clients
- Promotion of CSPO through off product claims
- Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
- Promotion of physical CSPO
- Providing funding or support for CSPO development efforts
- Research & Development support
- Stakeholder engagement
- No actions taken
- Others

Others

-

**1.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here**

<https://www.ing.com/Sustainability/Our-Stance/Palm-oil.htm>

<https://www.ing.com/Newsroom/News/Five-things-about-palm-oil.htm>

<https://www.ing.com/Sustainability/Sustainable-business/Human-Rights.htm>

<https://www.imvoconvenanten.nl/en/banking/news/afronding-analyse-palmolieketen>

---