

## Notification template for Article 131 CRD – Global Systemically Important Institutions (G-SIIs)

Please send this template to

- [notifications@esrb.europa.eu](mailto:notifications@esrb.europa.eu) when notifying the ESRB;
- [macropru.notifications@ecb.europa.eu](mailto:macropru.notifications@ecb.europa.eu) when notifying the ECB;
- [notifications@eba.europa.eu](mailto:notifications@eba.europa.eu) when notifying the EBA.

Emailing this template to the above-mentioned addresses constitutes an official notification, no further official letter is required. In order to facilitate the work of the notified authorities, please send the notification template in a format that allows electronically copying the information.

1. Notifying national authority	
1.1 Name of the notifying authority	De Nederlandsche Bank N.V.
2. Description of the measure	
2.1 Concerned institution(s)	ING N.V.
2.2 Level of the buffer applied	1%
2.3 Names of subsidiaries	For subsidiaries (at publication date of the annual report), see: ING Groep N.V.: Annual report, page 375 <a href="https://www.ing.com/web/file?uuid=233b1556-54d9-4fb7-9385-c1a4e3f083f1&amp;owner=b03bc017-e0db-4b5d-abbf-003b12934429&amp;contentid=49335">https://www.ing.com/web/file?uuid=233b1556-54d9-4fb7-9385-c1a4e3f083f1&amp;owner=b03bc017-e0db-4b5d-abbf-003b12934429&amp;contentid=49335</a>
3. Timing of the measure	
3.1 Timing of the Decision	We follow the 2020 outcome of the assessment of the Financial Stability Board. Should the ECB advise revisions to this decision, these will be duly considered in good faith. Should this not be the case, the decision will be made the 11 <sup>th</sup> of December.
3.2 Timing of the Publication	We plan to publish our decision on the 28 <sup>th</sup> of December.
3.3 Disclosure	Since we confirm the outcome of the FSB exercise, we will only publish a notification on our website.
3.4 Timing of Application	The results of this year's analysis will apply from 1 January 2022;

	In 2021 a G-SII buffer of 1% is applicable to ING.
<b>3.5 Phasing in</b>	The G-SII buffer is fully phased in as of 2019.
<b>4. Reason for activation of the G-SII buffer</b>	
<b>4.1 Indicators used for designation of the G-SII (Article 131.2)</b>	We used the standard BIS template.
<b>4.2 Scores and buckets (Article 131.2 and 131.9)</b>	Please provide information on: <ul style="list-style-type: none"> <li>a. 160; Bucket 1</li> <li>b. Size: 146; Inter: 157, Sub/Infra: 59, Complexity: 68, Cross-juris: 370</li> <li>c. None</li> </ul>
<b>5. Cross-border and cross-sector impact of the measure</b>	
<b>5.1 Assessment of cross-border effects and the likely impact on the internal market (Recommendation ESRB/2015/2)</b>	As the measure applies at a consolidated level, there may be an impact on individuals or companies outside the Netherlands through exposures of subsidiaries and branches. However, given the current capitalisation level of the identified G-SII and since the buffer is fully phased in, DNB expects the impact to be limited.
<b>5.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</b>	The G-SII buffer is applied at the consolidated level, which avoids (jurisdictional) shifts of activities within groups due to regulatory arbitrage. Systemic banks may take measures to reduce their systemic importance, possibly including a shift of activities to non-regulated entities. However, due to the level of the capital increase and the current capitalisation level of the identified G-SII, we expect these incentives to be small. Furthermore, if banks reduce their systemic importance in an orderly manner, this could also be beneficial for financial stability.

<b>6. Combinations and timing of the G-SII notified</b>	
<b>6.1 combinations between G-SII and O-SII buffers (Article 131.14)</b>	Conform the CRD V, only the highest of the O-SII and G-SII buffer is applicable. In the case of ING, the O-SII buffer is higher than the G-SII buffer, and will thus be the binding requirement.
<b>6.2 Combinations with SRB buffers (Article 131.14 + Article 133.5)</b>	Are any of the institutions subject to a systemic risk buffer? If yes, please provide the following information: <ul style="list-style-type: none"> <li>a. ING is currently subject to a 2,5% SRB. However, once the relevant CRD V provisions are transposed into Dutch legislation (expected to be 28<sup>th</sup> December 2020), the SRB will be abolished (i.e. lowered to 0%). Do note that at the same time, the O-SII buffer will be increased to 2,5%.</li> <li>b. The SRB is applied to all exposures.</li> </ul>

	c. The SRB is applied at the same consolidation level as the G-SII buffer
<b>6.3 Interaction with other measures</b>	We carefully monitor overlap between measures and take the changes of the CRD V into considerations. Apart from the O-SII buffer, we do not see overlap with other measures (e.g. with Pillar 2). Since only the highest of the O-SII and G-SII buffer is applicable, we don't see overlap in this regard either.
<b>7. Miscellaneous</b>	
<b>5.1 Contact person(s) at notifying authority</b>	Kenny Martens, +31 205242465, <a href="mailto:k.d.l.martens@dnb.nl">k.d.l.martens@dnb.nl</a>
<b>5.2 Any other relevant information</b>	