



Rating Committee: 15.12.2016

Strengths/Opportunities:

- · Well-balanced business model
- · Strong franchise in its core markets
- Remaining strong business performance
- · Solid capital and liquidity position
- Robust economic development in most of ING Bank's core markets and further recovery of the Dutch housing market
- Moderate risk profile with a good and further improved asset quality
- · Frontrunner in Digital Banking

Weaknesses/Threats:

- · Ongoing low-interest rate environment
- Increasing regulatory costs and uncertainties regarding final shape of regulatory requirements
- Highly competitive banking sector with an increasing importance of FinTechs
- Considerable size of Dutch residential mortgages

Financial data:

| Figures (EUR m) | 9M2016 | 9M2015 |
|-------------------------|---------|---------|
| Total underlying income | 12,997 | 12,509 |
| Gross result | 5,909 | 5,802 |
| Net result | 3,582 | 3,721 |
| Total assets | 869,533 | 857,984 |
| CET1 capital ratio | 12.6% | 11.3% |
| Total capital ratio | 17.6% | 16.5% |

Analysts:

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ING Bank N.V. Rating Result

Summary:

| | Rating | |
|-------------------------------|----------|--|
| Financial profile | strong | |
| - Long-term earnings position | strong | |
| - Sustained capital position | strong | |
| Business profile | adequate | |
| - Strategy and market | strong | |
| - Risk profile | adequate | |
| - Capitalization potential | strong | |

(strong > adequate > acceptable > deficient > problematic > insufficient

Rating history:

| Rating | Outlook | Outlook Date | |
|--------|----------|--------------|--|
| A+ | stable | 15.12.2016 | |
| A+ | stable | 22.06.2016 | |
| A+ | stable | 16.12.2015 | |
| A | positive | 09.06.2015 | |
| A | positive | 12.12.2014 | |

Rating scale

| Rating | Rating categories |
|-------------------|---------------------------------------|
| AAA | highest financial standing |
| AA+ / AA / AA- | very high financial standing |
| A+ / A / A- | high financial standing |
| BBB+ / BBB / BBB- | good financial standing |
| BB+ / BB / BB- | satisfactory financial standing |
| B+ / B / B- | financial standing scarcely adequate |
| CCC+ / CCC / CCC- | financial standing no longer adequate |
| CC/C | inadequate financial standing |
| D | moratorium / insolvency proceedings |

Regulatory disclosure requirements

Name and function of the analysts:

- Harald Erven, Lead Rating Analyst, GBB-Rating, Cologne
- Philipp Krohs, Rating Analyst, GBB-Rating, Cologne

Company address:

GBB-Rating Gesellschaft für Bonitätsbeurteilung mbH, Kattenbug 1, 50667 Cologne

Members of the Rating Committee:

- Manfred Kühnle, Certified Public Accountant
- Bernd Bretschneider, Managing Director GBB-Rating, Köln

| Date | Rating Committee | Notification | Issue |
|------------------------------------|------------------|--------------|------------|
| First rating | 16.12.2013 | 17.12.2013 | 30.12.2013 |
| Current rating | 15.12.2016 | 15.12.2016 | 19.12.2016 |

Validity:

Rating: 12 monthsOutlook: 24 months

Subsequent rating changes after notification to client:

none

Major sources of information for the rating:

- Annual report 2015
- Quarterly Report Q3 2016
- Management meeting 28.11.2016
- Further disclosures and company specific information

Statement about the quality of information available (including potential restrictions):

The quality and extent of information (interviews and documents) were suitable to obtain a comprehensive
picture of the bank and to assign an objective, transparent and professional credit rating

Applicable rating methodology, rating type and release:

- Solicited rating
- Methodology for Rating Banks and Building Societies (Version 3.0.02) cluster credit and counterparty credit risk (CRR)
- www.gbb-rating.eu/en/presse/eu-veroeffentlichungen/Pages/default.aspx

Meaning of the rating category:

www.gbb-rating.eu/en/ratings/ratingskala/Pages/default.aspx

Business relationship:

Besides the rating mandate there are further rating mandates within the Group

Legal remarks

GBB-Rating Gesellschaft für Bonitätsbeurteilung mbH does not make any guarantees regarding the accuracy, completeness or timeliness of the present rating. GBB-Rating shall not have any responsibility or liability for the suitability of the rating for particular purposes or losses arising from the use thereof. The current rating report is not an investment recommendation.

Future events are uncertain. Ratings are based on predictions of these and thus inevitably rely upon estimates. Therefore they solely represent statements of opinion rather than statements of fact or investment advice.

Credit ratings are performed with proficiency and due professional care. Ratings are based on the information provided by the applicant. This information is used in reaching an opinion about the future viability as well as the strengths and weaknesses of the rated company as of the date of rating issuance.